

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Preventing Undue Discrimination )  
and Preference in Transmission )  
Service )**

**Docket No. RM05-17-000  
and  
Docket No. RM05-25-000**

**REQUEST OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION  
FOR AN ADDITIONAL EXTENSION OF TIME FOR COMPLIANCE FILING  
IN RESPONSE TO PARAGRAPH 223 OF ORDER NO. 890**

The North American Electric Reliability Corporation (NERC) hereby requests an additional extension of time, from May 9, 2008 until August 29, 2008 to submit five revised Reliability Standards MOD-001, MOD-008, MOD-028, MOD-029 and MOD-030 and until November 21, 2008 to submit one or more standards related to Capacity Benefit Margin (CBM) as required by paragraph 223 of the Commission's Order No. 890.<sup>1</sup> In support of this request, NERC states as follows:

In Order No. 890,<sup>2</sup> the Commission directed public utilities working through NERC to modify reliability standards regarding Available Transfer Capability (ATC) by December 10, 2007. The Commission repeated that direction in Order No. 693.<sup>3</sup> NERC and the industry stakeholders serving on the standards drafting team have worked diligently and have made considerable progress in addressing a number of the Commission's directives. However, because of the complexity of the task and to allow the proper vetting of the proposed solutions that the drafting team has developed for the

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<sup>1</sup> *Preventing Undue Discrimination and Preference in Transmission Service*, FERC Stats. & Regs. ¶ 31,241 at PP 141 and 223 (2007) ("Order No. 890").

<sup>2</sup> *Id.*

<sup>3</sup> *Mandatory Reliability Standards for the Bulk-Power System*, 118 FERC ¶ 61,218, FERC Stats. & Regs. ¶ 31,242 (2007) ("Order No. 693"), *order on reh'g, Mandatory Reliability Standards for the Bulk-Power System*, 120 FERC ¶ 61,053 (2007) ("Order No. 693-A").

remaining issues, NERC will be unable to meet the deadline set in the Commission's Notice of Extension granted on December 6, 2007. Accordingly, NERC requests an extension of time to complete the remaining activities necessary to deliver a high-quality set of reliability standards that addresses the directives contained in Order Nos. 693 and 890.

NERC describes below (1) the current status of the project and the efforts undertaken to date, (2) the remaining activities and schedule needed to achieve quality standards that are responsive to the Commission's directives, and (3) NERC's explanation of the need for the extension of time.

#### **CURRENT STATUS AND BACKGROUND<sup>4</sup>**

In April 2005, NERC formally began its efforts to revise its existing reliability standards related to ATC. These efforts were initiated based on the work of the Long-Term ATC/AFC Task Force, a group working under the now-retired NERC Market Interface Committee with the charge of developing a long-term strategy for addressing concerns with ATC coordination and accuracy. Since that time, the Commission has issued a Notice of Inquiry, a Notice of Proposed Rulemaking and ultimately Order Nos. 890 and 890-A related to the ATC standards. Throughout these developments, the NERC standards drafting team has been working to discuss the relevant issues, draft language in support of industry needs, and ensure that its efforts comply with the intentions and directives of the Commission.

On June 13, 2007, NERC filed, concurrently with the North American Energy Standards Board (NAESB), a status report on the ATC development effort. Since then,

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<sup>4</sup> Attachment 1 sets forth a detailed history and timeline of the efforts to develop the ATC-related standards.

the standards drafting team has continued to meet extensively separately and with NAESB's drafting teams in order to respond the Commission's Order appropriately and in a coordinated fashion. In March 2007, 35 sets of comments were submitted during the initial posting of the first draft ATC standard developed in response to Order No. 890. After evaluating and responding to each comment, the standards drafting team revised this standard, drafted five more standards, and posted all six standards for industry review and comment in May 2007. The standards received 114 sets of comments during this period.

The standards drafting team continued to refine the standards and again posted all six standards for industry review and comment in October 2007. During this posting, 51 sets of comments were submitted on the six draft reliability standards. At that time, the standards drafting team did not believe they had achieved the industry consensus necessary for passage of these standards and would not be able to meet the December 2007 deadline. Therefore, on November 21, 2007, NERC requested an extension of time to submit its filing to May 9, 2008.

By an order issued on December 6, 2007, the Commission granted public utilities, working through NERC, an extension of time to and including May 9, 2008, to modify the reliability standards related to the calculation of ATC. In addition, the Commission granted public utilities an extension of time to and including August 7, 2008, to develop, through NAESB, business practices that complement NERC's new reliability standards.

The standards drafting team revised the draft reliability standards and presented the draft ATC standards for ballot without the benefit of additional industry review and comment on the significant changes that resulted from the comments received during the

third comment period. This approach, although endorsed by the NERC Standards Committee with the goal of enabling the industry to meet the May 2008 deadline, differs from the process steps outlined in Commission-approved NERC *Reliability Standards Development Procedure* that governs NERC's standards development process. The initial ballot was held from March 3-12, 2008. While a quorum was reached with respect to all six draft reliability standards, each failed to achieve a two-thirds majority of the weighted segment votes cast. Among other key technical comments, many negative votes were attributed to the balloters' belief that further industry review and vetting should have been undertaken.

The standards drafting team has reviewed the 326 comments submitted with ballots during the initial ballot of the six ATC standards and recommended that the revised set of standards be presented for another round of industry review and comment before proceeding to the ballot process again. This recommendation is based on the significant number of changes that the team made to the drafted standards as a result of the third industry comment period in the first instance and now as a result of the initial ballot. As well, the recommendation is responsive to the substantial number of voters who objected to the earlier failure to follow the NERC standards development process.

The standards development process is designed to allow the expertise of industry stakeholders to come to bear through comments on the proposals presented by the drafting teams. By circumventing this step in the development process, a foundational aspect of the process was not followed. To that end, NERC believes it is of primary importance to allow the industry stakeholders to provide commentary on the next draft of

the ATC standards before proceeding to ballot in order to achieve the high quality set of reliability standards that NERC, the industry and the Commission desire.

The reliability standards being developed for ATC in response to Order No. 890 and as clarified in Order No. 890-A directives belong to the “Modeling, Data, and Analysis (MOD)” family of NERC reliability standards. These standards focus on the development of various methods for analyzing the bulk power system to identify reliability concerns that require mitigation. The specific MOD standards being written or enhanced in response to Order No. 890 are as follows:

**MOD-001: Available Transfer Capability (ATC).** This standard serves as the foundation of the detailed ATC methodology standards. MOD-001 requires the selection of one or more methodologies; specifies that ATC be calculated using those methodologies on a fixed schedule for specific timeframes; requires the development and maintenance of an “Implementation Document,” which will serve a detailed overview of each transmission service provider’s (TSP’s) processes for determining ATC; defines the base requirements for the handling of counterflows; and specifies the required items for data exchange to be used in support of reliable, coordinated calculation of ATC.

**MOD-004: Capacity Benefit Margin (CBM).** This standard provides detail regarding CBM based on the new requirements specified in Order No. 890. This standard represents a significant departure for many industry participants from how CBM is currently handled. The current version of proposed MOD-004 requires the development and maintenance of an “Implementation Document,” which will serve as a detailed overview of each TSP’s processes for determining CBM, specifies how a load-serving entity (LSE) or a group of LSEs may request CBM, defines how a TSP must

process such a request and set CBM based on that request, and sets forth the process for scheduling CBM.

**MOD-008: Transmission Reliability Margin (TRM).** MOD-008 describes how TSPs may attempt to quantify uncertainty and account for risk. To a large extent, the details of this standard are limited to defining the categories of risk a TSP may consider, specifying the documentation requirements associated with TRM (in the form of an “Implementation Document”), and requiring that TRM may not be scheduled upon except as part of an intra-hour reserve sharing effort.

**MOD-028: Area Interchange Methodology<sup>5</sup> and MOD-029: Rated System Path Methodology.** These two standards reflect current practice for much of North America today, and provide the details of how ATC is determined using these methodologies. The Area Interchange methodology (also referred to as the Network Response ATC methodology) is primarily used in the southeastern part of the United States, although it is used in the Midwest in some cases as well. The Rated System Path methodology is currently used exclusively in the Western Interconnection (but may be used elsewhere in the future). Both standards have the same general format, and discuss how to set up models and assumptions, how to calculate Total Transfer Capability, how to determine Existing Transmission Commitments, and how to determine ATC.

**MOD-030: Flowgate Methodology.<sup>6</sup>** Like MOD-028 and MOD-029, MOD-030 provides the specific details for determining ATC. However, unlike the other two

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<sup>5</sup> North American Electric Reliability Council. 1995. *Transmission Transfer Capability – A Reference Document for Calculating and Reporting the Electric Power Transfer Capability of Interconnected Electric Systems*. Pages A-6 through A-20.

<sup>6</sup> North American Electric Reliability Council. 1996. *Available Transfer Capability Definitions and Determination – A Framework for Determining Available Transfer Capabilities of the Interconnected Transmission Networks for a Commercially Viable Electricity Market*. Appendix A.

reliability standards, MOD-030 utilizes the concept of flowgates to determine ATC. This standard begins with a description of how to select flowgates for consideration, then continues with specifications for how to set Total Flowgate Capability, how to determine the impacts of Existing Transmission Commitments, how to determine Available Flowgate Capabilities, and how to convert a flowgate capability to a path-based transfer capability.

In addition to the modifications to, or creation of, the above standards, the standards drafting team intends to retire Reliability Standards MOD-002, MOD-003, MOD-005, MOD-006, MOD-007, MOD-009, FAC-012 and FAC-013, as their content is either being moved to NAESB Business Practice Standards or wholly incorporated into the other NERC reliability standards mentioned previously.

#### **REMAINING ACTIVITIES AND SCHEDULE**

NERC believes the standards drafting team continues to make significant progress in completing its charge to develop the ATC standards and is gaining the consensus needed for approval. The team believes that the outreach efforts it has conducted to understand and address the comments offered in the initial ballot and the subsequent changes it is making to the drafted standards continue to build the consensus needed for successful passage of these standards. To the extent the team continues to address technical issues with the standards, NERC believes the activity advances the technical quality of the standards. NERC does not believe the team has reached an impasse with the industry stakeholders regarding the drafted standards such that consensus is not attainable.

Although the standards drafting team has made significant progress on the ATC-related standards, NERC will not meet the May 9, 2008 deadline. NERC received a significant number of comments during the initial ballot phase, in which a large number of commenters indicated that the standards should have been presented for comment after the standards drafting team made revisions, instead of proceeding directly to balloting. In response to the comments and pursuant to the NERC Rules of Procedure, Appendix 3A, the standards drafting team has finalized revisions and has posted new draft standards of MOD-001, MOD-008, MOD-028, MOD-029 and MOD-030 for industry comment in order to achieve consensus on the standards.

The activities remaining on the ATC-related standards include responding to industry comments following the close of the comment period, a pre-ballot review period of thirty days, balloting to determine industry consensus and NERC Board of Trustee approval. Five of six ATC-related standards are anticipated to be completed by August 29, 2008. NERC is continuing to work on revisions to MOD-004 and will post it for comment in the near future with an expected completion date of November 21, 2008.

Set forth below is the latest version of the scheduling milestones.

NERC PROCESS MILESTONES	ORIGINAL DATES			NEW DATES			
	NERC ATC Standards	NERC CBM Standards	NERC TRM Standards	NERC ATC Standards	NERC TRM Standards	NERC CBM Standards (LSE Study)	NERC CBM Standards (Regional Study)
First Draft Complete	February 14, 2007	May 25, 2007		February 14, 2007	May 25, 2007	May 25, 2007	May 16, 2008
First Draft Comment Period	February 15 - March 16	May 25 - June 25		February 15 - March 16	May 25 - June 25	May 25 - June 25	May 16 - June 30
Second Draft Complete	May 25, 2007	October 30, 2007		May 25, 2007	October 30, 2007	October 30, 2007	N/A
Second Draft Comment Period	May 25 - June 25	October 30 - December 14		May 25 - June 25	October 30 - December 14	October 30 - December 14	N/A
Third Draft Complete	October 30, 2007	N/A		October 30, 2007	April 16, 2008	May 16, 2008	N/A
Third Draft Comment Period	October 30 - December 14	N/A		October 30 - December 14	April 16 - May 15	May 16 - June 30	N/A
Fourth Draft Complete	N/A	N/A		April 16, 2008	N/A	N/A	N/A
Fourth Draft Comment Period	N/A	N/A		April 16 - May 15	N/A	N/A	N/A
Posting for Balloting	February 1, 2008			June 21, 2008		August 26, 2008	
Balloting Complete	April 18, 2008			August 25, 2008		November 10, 2008	
Board Approval Complete	May 7, 2008			August 27, 2008		November 19, 2008	
Compliance Filing	May 9, 2008			August 29, 2008		November 21, 2008	

## NEED FOR EXTENSION

The requested extensions will allow NERC to complete the ATC-reliability standards development effort. The principal reason for this request for additional time is to adequately address the concerns raised by the industry regarding the need to fully vet and vote these standards.

The standards drafting team believes that five of the standards (MOD-001, MOD-008, MOD-028, MOD-029 and MOD-030) can be modified such that they will achieve the two-thirds weighted segment consensus needed for passage. The standards drafting team has drafted these changes and posted the new drafts for comment. Because of the magnitude of the changes to these standards that were made as a result of the third comment period (without benefit of a subsequent comment phase) and those changes that are being made in response to comments to the initial ballot, the standards drafting team

strongly believes that the prudent action is to allow the expertise of the industry to weigh in on the current version of the standards before proceeding to a subsequent ballot. This approach is consistent with NERC's ANSI-approved process that requires any substantive changes to the standards be reviewed by its stakeholders through a formal comment period. Following this approach, the standards drafting team expects to have these five standards completed for filing with the Commission by August 29, 2008. NERC supports this request.

The CBM standard (MOD-004-1) received significant comments, and the standards drafting team is still evaluating the comments and possible revisions. Among the options being considered are modifying the current draft to be more flexible in application or possibly creating a new standard for regional CBM processes. Additional time beyond August 29, 2008 is required to allow more intensive review and revisions to and to provide for a longer comment period if a new standard is required. NERC requests an extension to and including November 21, 2008, for the filing of this standard.

The team has taken a significant amount of time to ensure, as the details of each methodology are discussed and vetted among the team, that all members of the team (not just the users of a particular methodology) are in agreement that the standards as written are reliable and technically sound.

Given the technical complexity of the issues involving ATC and standard development, shortening the timeline has already resulted in industry participants voting in the negative when the ATC-standards were balloted as a reflection of their insufficient ability to review and understand the proposed technical proposals. NERC believes the

requested extension optimizes its ability to meet both elements. NERC will keep the Commission's staff apprised of the progress in moving forward with these standards.

## **CONCLUSION**

Wherefore, NERC respectfully requests that it be granted an extension, to August 29, 2008 for the filing of MOD-001, MOD-008, MOD-028, MOD-029 and MOD-030 and an extension to November 21, 2008 for the filing of MOD-004, to submit the ATC-related standards in response to paragraph 223 of the Commission's Order No. 890.

Respectfully submitted,

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Dated: April 17, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 17th day of April, 2008.

*/s/ Rebecca J. Michael*

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Rebecca J. Michael

*Attorney for North American Electric  
Reliability Corporation*

## **Attachment 1 – Work History and Timeline**

Below is a list of key events and meetings related to the development of the ATC standards. This list only includes “formal” activities, and generally does not include the numerous informal working meetings held by sub-groups within the Standards Drafting Team.

**April 14, 2005 – Long Term ATC Task Force publishes its final report.**

**May 27, 2005 – FERC issues its Notice of Inquiry (NOI).**

**July 8 – August 8 2005 – The ATC/TTC/AFC and CBM/TRM SARs initial drafts are posted for comment.**

November 16, 2005 – The SAR Drafting team holds a conference call and WebEx to review Regional documents related to ATC/TTC/AFC/CBM/TRM; to review MOD-001 through -009; to review the comments on the SAR comments; and to review the comments to the FERC NOI.

January 13, 2006 – The SAR Drafting Team holds a conference call and WebEx to refine the SARs.

January 25-26, 2006 – The SAR Drafting Team holds a meeting to refine the SARs and to work on the development of coordination process between NERC and NAESB.

**February 15, 2006 – The final versions of the ATC/TTC/AFC and CBM/TRM SARs are posted.**

April 5-6, 2006 – A joint meeting with NAESB is held, and the Standards Drafting Team begins considering the changes that will be needed to the MOD standards, what the posting strategy for the standards will consist of, and how NERC and NAESB will coordinate their efforts.

April 13, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001 standard and the development timeline.

April 17, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001 standard.

April 28, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001, MOD-004, MOD-005, MOD-008 and MOD-009 standards.

May 2, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001, MOD-004, MOD-005, MOD-008 and MOD-009 standards.

May 5, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001, MOD-004, MOD-005, MOD-008 and MOD-009 standards.

May 10, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001 standard.

May 16, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001, MOD-004, MOD-005, MOD-008 and MOD-009 standards, as well as development of the MOD-001 comment form.

May 20, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001 standard and discuss outstanding questions related to TTC.

**May 18, 2006 – FERC issues its Notice of Proposed Rulemaking.**

June 8-9, 2006 – The Standards Drafting Team holds a meeting to discuss the relationship of the FAC standards to the ATC standards, review the methodologies in practice and analyze the NOPR.

June 19, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to review changes needed to respond to the NOPR, continue discussion of the various methodologies in use, and review changes that have been made to the MOD-001 standard.

June 26, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001 standard.

July 7, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to review the comments of the NERC Standard Process Manager regarding the MOD-001 standard.

July 20, 2006 – The Standards Drafting Team holds a meeting to draft changes to the MOD-001 standard and have additional discussions regarding the NOPR.

July 27, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001 standard.

August 3, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001 standard related to Generation dispatch.

September 22, 2006 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001 standard and delegate work assignments.

January 11-12 2007 – The Standards Drafting Team holds a Conference Call and WebEx to draft changes to the MOD-001 standard related to fill-in-the-blank concerns, as well as discusses the standard relating to TRM and CBM.

February 7-8, 2007 – The Standards Drafting Team holds a meeting to work on drafting of standards language for MOD-001, TRM, ETC, CBM, and the FAC-012 and -013 standards.

February 15, 2007 – The MOD-001 standard is posted for a 30-day comment period.

**February 16, 2007 – FERC issues its Order No. 890.**

March 13-14, 2007 – The Standards Drafting Team holds a meeting to develop the schedule for responding to industry comments, as well as continue work on the standards language for TRM, ETC, CBM and FAC-012 and -013.

March 23, 2007 – The Standards Drafting Team holds a Conference Call and WebEx to discuss the TRM standards language and the responses to the MOD-001 comments.

April 11-12, 2007 – The Standards Drafting Team holds a meeting to discuss how to respond to the 890 Order and to continue working on the MOD-001 comment responses, and then breaks into sub-teams to work on the various parts of the standard (ETC, CBM, TRM, ATC, TTC).

May 3, 2007 – The Standards Drafting Team holds a Conference Call and WebEx to assign team members to draft comment forms for the next posting of the standards.

May 15-17, 2007 –The Standards Drafting Team holds a joint meeting with NAESB to discuss the posting of the standards and how to re-structure them based on industry comments.

May 22, 2007 – The Standards Drafting Team holds a Conference Call and WebEx to review the comment forms and prepare for the next posting of the standards.

**May 23, 2007 – A Supplemental SAR to expand the scope of the Drafting Team to include FAC-012 and -013 and to allow for expansion of the team to include TTC experts is posted for comment.**

**May 25, 2007 – MOD-001, MOD-004, MOD-008, MOD-028, MOD-029 and MOD-030 are posted for a 30-day comment period.**

June 12-13, 2007 – The Standards Drafting Team holds a joint meeting with NAESB to discuss the names of the methodologies; begin developing the data exchange requirements; discuss multiple reservations from a single point of receipt (POR) to multiple points of deliveries (PODs) that exceed the generating capability at the POR; source-to-sink analysis; the use of 3<sup>rd</sup> party limits in the ATC calculation; the retirement of FAC-012 and FAC-013; compliance; the applicability of the standards to ERCOT and questions for the FERC.

June 13, 2007 – NERC and NAESB file status reports with the Commission.

July 11-13, 2007 – The Standards Drafting Team holds a joint meeting with NAESB to develop responses to the comments on MOD-001 and MOD-004.

July 16-19, 2007 – The Standards Drafting Team holds a joint meeting with NAESB to develop responses to the comments on MOD-008; review the functional model and apply it consistently to the MODs; and assign members of the team respond to comments and solve the problems identified in the June 12th meeting.

**July 31, 2007 – The final version of the supplemental SAR, which expands the Standards drafting team’s scope and membership to address TTC, is posted.**

August 7-9, 2007 – The Standards Drafting Team holds a joint meeting with NAESB to work on the responses to the MOD-028 and MOD-029 comments, as well as work to on standardizing the TTC calculation.

August 27, 2007 – The Standards Drafting Team meets with FERC staff to discuss the status of the work to date.

August 27-29, 2007 – The Standards Drafting Team holds a joint meeting with NAESB and begins working in sub-teams on consistent formatting and language between the standards. The team proposes and agrees to a schedule with a delivery in late August, 2008.

September 12-14, 2007 – The Standards Drafting Team holds a joint meeting with NAESB and discusses an alternate schedule with delivery in April, 2008. The Drafting Team finishes the majority of the work on MOD-028, -029 and -030; adds Violation Risk Factors and Time Horizons to the standards, and discusses (without resolution) the situation where there are multiple reservations from a single POR to multiple PODs that exceed the generating capability at the POR.

September 25-27, 2007 – The Standards Drafting Team holds a meeting and does a final consistency review of MOD-001, -008, -028, -029 and -030. The team works extensively on MOD-004 (CBM). Violation Risk Factors and Time

Horizons are added to MOD-001, -004 and -008. The team finalizes the Implementation plan and Comment Form for the next posting.

October 9-11, 2007 – The Standards Drafting Team holds a meeting and finalizes the responses to comments and the measures and compliance for all the standards.

**October 30, 2007 – MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, MOD-030 and the Implementation Plan are posted for a 45-day comment period.**

November 7, 2007 – The Standards Drafting Team holds a joint meeting with NAESB to review and discuss the NAESB Business Practices related to ATC (ATC/TTC narratives, postbacks, posting of data on OASIS) and provide an update on MOD-001, -004, -008, -028, -029 and -030.

November 30, 2007 – NERC holds an industry web conference to review MOD-001, -004, -008, -028, -029 and -030.

January 8-10, 2008 – The Standards Drafting Team holds a meeting to review and develop responses to comments received during the 45-day comment period.

January 18, 2007 – The Standards Drafting Team holds a joint conference call with NAESB to review and discuss the NAESB Business Practices related to ATC (ATC/TTC narratives, postbacks, posting of data on OASIS) and review comments received by NERC related to NAESB and items within NAESB's scope.

January 22-24, 2008 – The Standards Drafting Team holds a meeting to continue its review of and development of responses to comments received during the 45-day comment period.

**February 1, 2008 – MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, MOD-030 and their associated Implementation Plans are posted for 30-day pre-ballot review.**

February 8, 2008 – The Standards Drafting Team holds a joint conference call with NAESB to review and discuss the NAESB ATC/TTC narrative Business Practices.

February 20, 2008 – NERC holds an industry web conference to review MOD-001, -004, -008, -028, -029 and -030.

**March 3-12, 2008 - MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, MOD-030 and their associated Implementation Plans are balloted.**

March 18-20, 2008 – The Standards Drafting Team holds a meeting to review and develop responses to comments received during the initial ballot. In this meeting, the Standards Drafting Team determines that another comment period will be required. The Standards Drafting Team begins making modifications to MOD-001, -008, -028, -029 and -030. The Standards Drafting Team defers work on MOD-004 due to the extensive comment received.

March 25-27, 2008 – The Standards Drafting Team holds a meeting to continue the review of and development of responses to comments received during the initial ballot and continues making modifications to MOD-001, -008, -028, -029 and -030.

April 3, 2008 – The Standards Drafting Team holds a conference call to continue the review of and development of responses to comments received during the initial ballot and continues making modifications to MOD-001, -008, -028, -029 and -030.

April 8-10, 2008 – The Standards Drafting Team holds a meeting to continue the review of and development of responses to comments received during the initial ballot and finalizes modifications to MOD-001, -008, -028, -029 and -030. The Standards Drafting Team begins work on reviewing the comments on MOD-004 and developing responses, as well as the drafting modifications to MOD-004.

**April 16, 2008 – MOD-001, MOD-008, MOD-028, MOD-029, MOD-030 and their associated Implementation Plans are posted for a 30-day comment period.**