**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Recommendations:** 2014 WEQ Annual Plan Item 1(a), 1(b) and 1(d) / R11020 (Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection – Permanent Solution, WEQ-008 Consistency Review, Standards Request R11020)

**Submitted By:** MISO

**Date:** February 6, 2015

MISO has reviewed the PFV standard posted for formal comment and has identified the following items where minor changes could be made to draft standard language to clarify the intent:

* General – These is a consistency in terminology issue where sometimes the term “firm NITS” is used and sometimes just “NITS” is used.  It appears the NAESB BPS intended to make “NITS” always be firm service (it wasn’t that way in the original standard) and to make “Secondary Network Transmission Service” to always be non-firm service.  However, there are gaps that are identified below where this distinction was not always applied.
* X008-1.8.2.5 – In both the section title and the sentence, use term “firm NITS” here (consistency issue).
* X008-1.9, Third Paragraph – Item (a) describes all NITS transactions and item (b) describes all grandfathered transactions.  These are supposed to be both firm and non-firm so consistent terminology is needed.
* X008-1.9.1.1, Third Paragraph, Second Line – Misspelled “final”.
* X008-1.12.2, Item 1 – Insert “Service” to read “Transmission Service Providers”.
* X008-1.12.2, Item 2 – Use term “NITS” here to only mean firm NITS (consistency issue).
* 008-2.1.7 – Here is the consistency issue in that Priority 6 is defined as “NITS from sources not DNRs”.
* 008-3.6.2.3 – Step 3, suggest replacing “utilizing firm PTP” with “utilizing Firm Transmission Service”.  Use term “NITS” here to only mean firm NITS (consistency issue).
* X008-3.6.2.3.4 – Use term “NITS” here to only mean firm NITS (consistency issue).
* 008-3.7 – Suggest replacing “using non-firm PTP” with “using Non-Firm Transmission Service”.  Suggest replacing “Constrained Facilities and Flowgates” with “Constrained Facilities or Flowgates”.
* 008-3.7.1.3 – Suggest replacing “utilizing firm PTP” with “utilizing Firm Transmission Service”.  Suggest replacing “for a sufficient amount of relief to start of” with “for a sufficient amount of relief to allow the start of”.  Suggest replacing “during TLR level 5b and to start of” with “during TLR level 5b and to allow the start of”. Use term “NITS” here to only mean firm NITS (consistency issue).
* X008-3.7.1.4.1 – To make this section read similar to Sections 3.6.2.3.3 and 3.7.1.5.1, suggest the first half of the sentence be changed as follows “Interchange Transactions and tagged PTP Intra-BA Transactions utilizing Firm Transmission Service will be curtailed on a pro-rata basis ~~with other Interchange Transactions and tagged PTP Intra-BA Transactions utilizing Firm Transmission Service~~ after”.
* X008-3.7.1.4.2 – Use term “NITS” here to only mean firm NITS (consistency issue).
* X008-3.7.1.5.2 - Use term “NITS” here to only mean firm NITS (consistency issue).

In that these suggested changes are minor in nature and are not intended to change the intent of the standard, MISO hopes the NAESB PFV Task Force shares the same view of the suggested changes.  If the Task Force agrees with one or more of the changes, they could be incorporated into the late comments submitted by the Task Force for consideration by the WEQ EC.