**Informal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Subcommittee:** Coordinate Interchange Scheduling Subcommittee

**Request:** Request for Formal Comments 2015 WEQ Annual Plan Item 1.e/R14002 (Develop, modify, or delete business practice standards to support request R14002 (NERC Project 2012-05 ATC Revisions (MOD A))

**Submitted By:** PJM

**Date:** July 28, 2015

PJM appreciates the time and effort by the NERC and NAESB groups to better refine the MOD standards related to the AFC/ATC processes. PJM feels that the newly drafted standards and business practices better reflect reliability and relevant business processes without the purely administrative requirements and VSLs.

PJM fully supports the proposed NAESB WEQ business practices with the following exception. The NAESB committee originally did not endorse requirements 1.4 and 1.4.1 but later this topic was reintroduced and progress stalled. With an eye on the overall benefit of the new standard, PJM abstained on the vote to include these requirements after prior votes to reject. PJM believes that requirements 1.4 and 1.4.1 could prevent possible future market products designed to enhance utilization, especially if neighboring entities feel that such products are beneficial and would not result in a reliability impact on other systems.

PJM urges the Executive Committee that, should they endorse the NAESB business practices, they should require additional clarification to requirements 1.4 and 1.4.1 as follows. The sum of Facility Ratings of Tie Facilities referenced in these requirements should take into account the expected use of reservations and schedules to help ensure efficient use of the transmission system.