

Standard Number	Req.	Text of Requirement of Retired Standard	Whether Proposed MOD-001-2 Addresses the Existing Requirement	Recommended NAESB Action by NERC Drafting Team	BPAT Comments
MOD-001-1a	R1.	Each Transmission Operator shall select one of the methodologies listed below for calculating Available Transfer Capability (ATC) or Available Flowgate Capability (AFC) for each ATC Path per time period identified in R2 for those Facilities within its Transmission operating area: [Time Horizon: Operations Planning] <input type="checkbox"/> The Area Interchange Methodology, as described in MOD-028 <input type="checkbox"/> The Rated System Path Methodology, as described in MOD-029 <input type="checkbox"/> The Flowgate Methodology, as described in MOD-030	Proposed MOD-001-2 does not require entities to select a specific methodology for determining ATC/AFC.	NAESB should consider whether its business practice standards should list the methodologies that entities may use for determining ATC/AFC.	NAESB should list the methodologies that entities may use for ATC and require that each TO define in its ATCID which one of the three methodologies it is applying to its management. NAESB is required to develop requirements to support posting ATC values associated with an ATC Path. NERC was tasked with development of the AFC definition and requirements needed to identify transmission facilities so this is not a NAESB standard development item.
MOD-001-1a	R2.	Each Transmission Service Provider shall calculate ATC or AFC values as listed below using the methodology or methodologies selected by its Transmission Operator(s): [Time Horizon: Operations Planning]	Requirement R2 of the proposed NERC standard requires entities to have an ATCID. Although no longer required under NERC's standards, it is expected that entities will continue to calculate values for these time ranges and describe those calculations in its ATCID.	NAESB should consider if there is a market need for NAESB to specify the range of hourly, daily and monthly values to be calculated or whether this required is captured elsewhere (e.g., OATT requirements).	NAESB should establish a minimum requirement for frequency of ATC calculation and the ATC calculation should use the most current reliability data (e.g., TTC, AFC, etc...).
MOD-001-1a	R2.1.	Hourly values for at least the next 48 hours.			
MOD-001-1a	R2.2.	Daily values for at least the next 31 calendar days.			
MOD-001-1a	R2.3.	Monthly values for at least the next 12 months (months 2-13).			
MOD-001-1a	R3.6.1.	The criteria used to determine when an outage that is in effect part of a day impacts a daily calculation.	Proposed R1 and R2 cover treatment of outages but not at this level of detail.	NAESB should consider these aspects of outages and how they affect markets.	Outages affect ATC limits in the daily time horizon and NAESB should address. Studies, modeling assumptions etc... are conducted by the Transmission Planner and/or Transmission Operator. NAESB should recognize Functional Model entities roles and responsibilities in the development of inputs that support the calculation of ATC. Calculation of Daily ATC is an important definition.
MOD-001-1a	R3.6.2.	The criteria used to determine when an outage that is in effect part of a month impacts a monthly calculation.	Proposed R1 and R2 cover treatment of outages but not at this level of detail.	NAESB should consider these aspects of outages and how they affect markets.	Outages affect ATC limits in the daily time horizon and NAESB should address. Studies, modeling assumptions etc... are conducted by the Transmission Planner and/or Transmission Operator. NAESB should recognize Functional Model entities roles and responsibilities in the development of inputs that support the calculation of ATC. Calculation of Monthly ATC is an important definition.
MOD-001-1a	R3.6.3.	How outages from other Transmission Service Providers that can not be mapped to the Transmission model used to calculate transfer or Flowgate capability are addressed.	Proposed R1 and R2 cover treatment of outages but not at this level of detail.	NAESB should consider these aspects of outages and how they affect markets.	There are two separate activities in the calculation of ATC: 1) Calculations of inputs (e.g., TTC, TRM, etc...) and, 2) receipt of inputs and the final calculation of ATC. NAESB should be silent on the calculation of inputs as this is a TO and TP action and NAESB address 'data exchanges' within a specific utility and between separate TPs.
MOD-001-1a	R6.	When calculating Total Transfer Capability (TTC) or Total Flowgate Capability (TFC) the Transmission Operator shall use assumptions no more limiting than those used in the planning of operations for the corresponding time period studied, providing such planning of operations has been performed for that time period. [Time Horizon: Operations Planning]	Proposed R1 requires disclosure of methods for determining TTC/TFC but does explicitly state that TOPs must use assumptions no more limiting than those used in the planning of operations for the corresponding time period studied.	NAESB should consider whether these requirements are necessary from a market perspective. The MOD A SDT, however, does not recommend setting a hard limit, such as "no more limiting." Depending on the region, the determination of TFC, TTC, AFC and ATC has varying methods and degree's of similarity to the planning of operations. While a comparison between the two may be of merit to insure that there is	NAESB should address from the standpoint that there is a 'data exchange' between the TSP and the TO/TP and that the 'limitation assumptions' are developed and used in TO/TP analysis.
MOD-001-1a	R7.	When calculating ATC or AFC the Transmission Service Provider shall use assumptions no more limiting than those used in the planning of operations for the corresponding time period. [Time Horizon: Operations Planning]	Proposed R2 requires disclosure of methods for determining ATC/AFC but does explicitly state that TSPs must use assumptions no more limiting than those used in the planning of operations for the corresponding time period studied.		NAESB should address from the standpoint that there is a 'data exchange' between the TSP and the TO/TP and that the 'limitation assumptions' are developed and used in TO/TP analysis. The TSP should not be the entity that establishes the assumptions used in determining system limitations.

MOD-001-1a	R8.	Each Transmission Service Provider that calculates ATC shall recalculate ATC at a minimum on the following frequency, unless none of the calculated values identified in the ATC equation have changed. [Time Horizon: Operations Planning]	Proposed R2 requires disclosure of practice but does not establish frequencies.	NAESB should review this requirement and determine if there is a business need to establish calculation frequencies for ATC.	NAESB should establish a minimum requirement for frequency of ATC calculation which should use the most current reliability data (e.g. TTC, AFC, etc...) NAESB should establish BPs to require TPs to update their ATC calculation frequency based on unique system and/or data changes and post the justification including frequency of calculation published on OASIS to meet FERC transparency requirements.
MOD-001-1a	R8.1.	Hourly values, once per hour. Transmission Service Providers are allowed up to 175 hours per calendar year during which calculations are not required to be performed, despite a change in a calculated value identified in the ATC equation.	Proposed R2 requires disclosure of practice which could include how failures of the automated systems is handled.	NAESB should review this requirement and determine if there is a business need to limit or qualify permissible computer down time.	See BPA comments on R8
MOD-001-1a	R8.2.	Daily values, once per day.	See R8 response	see R8	See BPA comments on R8
MOD-001-1a	R8.3.	Monthly values, once per week.	See R8 response	see R8	See BPA comments on R8
MOD-004-1	R1.1.	The process through which a Load-Serving Entity within a Balancing Authority Area associated with the Transmission Service Provider, or the Resource Planner associated with that Balancing Authority Area, may ensure that its need for Transmission capacity to be set aside as CBM will be reviewed and accommodated by the Transmission Service Provider to the extent Transmission capacity is available.	R3	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more methods of determining CBM and to establish guidelines for CBM's use.	NAESB should consider establishing requirements for CBM but the Load-Serving Entity Resource Study process should not be included in the NAESB commercial ATC standard development project scope.
MOD-004-1	R1.2.	The procedure and assumptions for establishing CBM for each Available Transfer Capability (ATC) Path or Flowgate.	R3	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more methods of determining CBM and to establish guidelines for CBM's use.	The NAESB ATC commercial standards should consider the posting the TP's CBM vetting process, practices and procedures.
MOD-004-1	R1.3.	The procedure for a Load-Serving Entity or Balancing Authority to use Transmission capacity set aside as CBM, including the manner in which the Transmission Service Provider will manage situations where the requested use of CBM exceeds the amount of CBM available.	R3	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more methods of determining CBM and to establish guidelines for CBM's use.	The NAESB ATC commercial standards should consider posting the TP's CBM vetting process, practices and procedures.
MOD-004-1	R4.2. - R6.2				Should be treated as a separate project Method, justification, need to be published if CBM is used by the TP
MOD-004-1	R7. - R9.				Separate project - associated with NERC EEA 2 parameters. OASIS posting is necessary
MOD-004-1	R12.	The Transmission Service Provider that maintains CBM shall approve, within the bounds of reliable operation, any Arranged Interchange using CBM that is submitted by an "energy deficient entity " under an EEA 2 if: [Time Horizon: Same-day Operations]			Separate project - associated with NERC EEA 2 parameters. OASIS posting is necessary
MOD-004-1	R12.1.	The CBM is available			See comment - MOD-004-1 R12
MOD-004-1	R12.2.				See comment - MOD-004-1 R12
MOD-004-1	R12.3.				Commercial standards need to recognize the inputs from the TO and/or TP to support an accurate TRM number.
MOD-008-1	R1.1.	Identification of (on each of its respective ATC Paths or Flowgates) each of the following components of uncertainty if used in establishing TRM, and a description of how that component is used to establish a TRM value: - Aggregate Load forecast. - Load distribution uncertainty. - Forecast uncertainty in Transmission system topology (including, but not limited to, forced or unplanned outages and maintenance outages). - Allowances for parallel path (loop flow) impacts. - Allowances for simultaneous path interactions. - Variations in generation dispatch (including, but not limited to, forced or unplanned outages, maintenance outages and location of future generation). - Short-term System Operator response (Operating Reserve actions). - Reserve sharing requirements. - Inertial response and frequency bias.	Proposed R3: Requires Disclosure of Practice. The various components listed to the left are not explicitly spelled out.	NAESB should review MOD-008-1 for identifying the elements in column C, at a minimum, within the TOPs TRMID.	
MOD-008-1	R1.2.	The description of the method used to allocate TRM across ATC Paths or Flowgates.			See comment - MOD-008-1 R1.1
MOD-008-1	R1.3.	The identification of the TRM calculation used for the following time periods:			See comment - MOD-008-1 R1.1
MOD-008-1	R1.3.1.	Same day and real-time.			See comment - MOD-008-1 R1.1
MOD-008-1	R1.3.2.	Day-ahead and pre-schedule.			See comment - MOD-008-1 R1.1
MOD-008-1	R1.3.3.	Beyond day-ahead and pre-schedule, up to thirteen months ahead.			See comment - MOD-008-1 R1.1
MOD-008-1	R4.	Each Transmission Operator that maintains TRM shall establish TRM values in accordance with the TRMID at least once every 13 months. [Time Horizon: Operations Planning]		NAESB should consider adding this time parameter for establishing TRM values.	See comment - MOD-008-1 R1.1

The use of TRM to limit interchange would be determined by TO. TO should be consulted on the use of TRM on interchange paths.

MOD-008-1	R5.	The Transmission Operator that maintains TRM shall provide the TRM values to its Transmission Service Provider(s) and Transmission Planner(s) no more than seven calendar days after a TRM value is initially established or subsequently changed. [Time Horizon: Operations Planning]		NAESB should consider adding this frequency update in a business practice. There may not be a need to mandate that the TOP send the TRM values to the TSP.	See comment - MOD-008-1 R1.1
MOD-028-1 MOD-029-1a	R1. - R11. R1. - R8.				Can be used as a model for TP if needed but should not be directly translated into commercial standard language.
MOD-030-2	R1. - R11.				Can be used as a model for TP if needed but should not be directly translated into commercial standard language.