

Bonneville Power Administration Comments to the NAESB
 Executive Committee ATC Project Scope Task Force
 Submitted for the Task Force Meeting, June 5th, 2014

FERC ATC Directives contained in Orders 693 - 890

1. 211. As TDU Systems note, there is neither a definition of AFC in NERC's Glossary nor an existing reliability standard that discusses the AFC method. **In order to achieve consistency in each component of the ATC calculation (discussed below), we direct public utilities, working through NERC, to develop an AFC definition and requirements used to identify a particular set of transmission facilities as a flowgate.**

BPA Comment: NERC was tasked with development of the AFC definition and requirements needed to identify transmission facilities – this is not a NAESB item.

2. However, we remind transmission providers that our regulations require the posting of ATC values associated with a particular path, not AFC values associated with a flowgate.

BPA Comment: NAESB is required to develop requirements to support posting ATC values associated with an ATC Path.

3. Transmission providers using an AFC methodology must therefore convert flowgate (AFC) values into path (ATC) values for OASIS posting. In order to have consistent posting of the ATC, TTC, CBM, and TRM values on OASIS, we direct public utilities, working through NERC, to develop in the MOD-001 standard a rule to convert AFC into ATC values to be used by transmission providers that currently use the flowgate methodology.

BPA Comment: NERC is required to establish the industry requirements to support converting AFC to ATC

4. F. 32 See Order No. 890 at P 211. ATC values must be posted for control area to control area interconnections, paths for which service is denied, curtailed or interrupted for more than 24 hours in the past 12 months, and paths for which a customer requests to have ATC or TTC posted. See 18 CFR 37.6(b)(1)(i).

BPA Comment: NAESB is required to establish the industry requirements to support ATC posting for paths noted in the citation. Calculation of ATC values should be done in ops.

5. 50...We believe that the ATC requirements in Order No. 890 allow sufficient flexibility so that utilities, working through NERC/ NAESB, can develop ATC standards that continue to provide reliability and are compatible with all other mandatory reliability standards or business practices, **yet provide discretion where appropriate.**

BPA Comment: Project Scope needs to include TP flexibility into the work plan

6. If a transmission provider is faced with unique system conditions or modeling assumptions related to firm transmission service reservations³¹ that are not addressed in the ATC-related NERC reliability standards, it must make them transparent through its Attachment C filing **AND THE OASIS POSTING REQUIREMENTS REGARDING ATC CALCULATION AND MODELING APPROACH, STUDIES, MODELS AND ASSUMPTIONS AND IMPLEMENT THEM CONSISTENTLY FOR ALL TRANSMISSION CUSTOMERS**

BPA Comment: Studies, modeling assumptions etc... are not conducted by the TSP but rather by the Transmission Planner and/or Transmission Operator. There may be an aspect of commercial activity that NAESB should consider such representing (e.g. posting) the results of Transmission Operator and Planning outcomes.

7. 301. The Commission adopts the NOPR proposal and requires the development of reliability standards that ensure ATC is calculated at consistent intervals among transmission providers. The Commission thus directs public utilities, working through NERC and NAESB, to revise reliability standard MOD-001 to require ATC to be recalculated by all transmission providers on a consistent time interval and in a manner that closely reflects the actual topology of the system, e.g., generation and transmission outages, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data.

BPA Comment: 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...).

8. This process must also consider whether ATC should be calculated more frequently for constrained facilities.

BPA Comment: NAESB should establish a minimum requirement for paths that have zero AT C.

9. We clarify in response to NorthWestern that TRM may be used to accommodate the procurement of ancillary services used to provide service under the pro forma OATT.

BPA Comment: NAESB should develop standards for TRM recognizing TRM is optional for the TP.

10. We deny as premature EPSA's and Williams' requests for clarification regarding the realtime determination and posting of ATC and AFC values, as well as posting of utilization of transmission provider's own system ETC

BPA Comment: NAESB should not include the development of ATC calc or posting requirements for real time.

11. In Order No. 890, the Commission required an exchange of the data both for short and long-term ATC/AFC calculation that will increase the accuracy of ATC calculations.³³ The Commission also required that ATC be recalculated by all transmission providers on a consistent time interval, and in a manner that closely reflects the actual topology of the system, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data, and that NERC/NAESB revise the related reliability standard and business practices accordingly.³⁴ EPSA and William should address their concerns through the NERC and NAESB processes implementing these requirements.

BPA Comment: There are two separate activities in the calculation of ATC: 1) Calculations of inputs, and, 2 receipt of inputs and the final calculation of ATC. NAESB should be silent on the calculation of inputs. As written, 'data exchange' could be interpreted to be within a specific utility or between two separate TPs and NAESB should clarify.

12. 60. Order No. 890 requires NERC and NAESB to develop a single set of ATC-related standards that will apply to all transmission providers, including RTOs and ISOs. We understand that the NERC ATC standard drafting team includes representatives from various industry sectors, including RTOs/ISOs, and we encourage NYISO to participate in the standard development process to provide NERC an opportunity to address its concerns. To the extent NYISO feels its concerns are not address in this process, it should bring the issue to the Commission's attention on review of the resulting reliability standards.

BPA Comment: No duplication for reliability standards that should be addressed by NERC.

13. 101. The Commission directed public utilities, working through NERC and NAESB, to revise reliability standard MOD-001 to require ATC to be recalculated by all transmission providers on a consistent time interval and in a manner that closely reflects the actual topology of the system, e.g., generation and transmission outages, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data. **The Commission stated that this process must also consider whether ATC should be calculated more frequently for constrained facilities.**

BPA Comment: See BPA comment above.

14. 104. The Commission agrees with Powerex that the standards adopted through the NERC and NAESB processes should serve as minimum or "no less frequent than" requirements to recalculate ATC. **Transmission providers also must update their ATC calculation when they receive substantial and material changes in data, such as updated load forecasts, changes in topology and dispatch patterns, which may be adopted through the NERC and NAESB processes should serve as minimum or "no less frequent than" requirements to recalculate ATC. Transmission providers also must update their ATC calculation when they receive substantial and material changes in data, such as updated load forecasts, changes in topology and dispatch patterns, which may be more frequent than the NERC and NAESB standards would otherwise require. In the absence of substantial and material changes in data, transmission providers are not required to update ATC on a more frequent basis than the minimum frequency that the NERC and NAESB standards require, once implemented. The Commission will consider the adequacy of the time frame for ATC updates on review of these standards.**

BPA Comment: NAESB should recognize the NERC Functional Model entities when establishing BPs for ATC to ensure clarity. The NAESB should establish a 'no less frequent than' calculation/recalculation ATC standard. NAESB should establish BPs to require TPs to update their ATC calculation frequency based on the data changes stated in the above citation.

15. 148. In Order No. 890, the Commission required transmission providers to make available, upon request, all data used to calculate ATC, TTC, CBM and TRM for any constrained posted path. We believe that this adequately addresses Constellation's request for access to modeling data used by the transmission provider. Specifically, we expect transmission providers to make available, upon request and subject to appropriate confidentiality protections and CEII requirements, the following modeling data: (1) load flow base cases and generation dispatch methodology; (2) contingency, subsystem, monitoring, change files and accompanying auxiliary files; (3) transient and dynamic stability simulation data and reports on flowgates which are not thermally limited; (4) list of transactions used to update the base case for transmission service request study; (5) special protection systems and operating guides, and specific description as to how they are modeled; (6) model configuration settings; (7) dates and capacities of new and retiring generation; (8) new and retired generation included in the model for future years; (9) production cost models (including assumptions, settings, study results, input data, etc.), subject to reasonable and applicable generator confidentiality limitations; (10) searchable transmission maps, including PowerWorld or PSSE diagrams; (11) OASIS names to Common Names table and PTI bus numbers; and, (12) flowgate and interface limits including limit category (thermal, steady state or transient, voltage or angular). **We decline, however, to require the transmission provider to post this information on OASIS, as Constellation suggests. We conclude that making this information available on request provides sufficient transparency for customers without unduly burdening the transmission provider.**

BPA Comment: This data that needs to be exchanged is handled in MOD-001-2 but the process of exchange (e.g. cyber security if applicable) should be addressed by NAESB.

16. **To the extent necessary, we clarify that the step-by-step modeling study methodology and criteria for adding or eliminating flowgates (permanent and temporary) is part of the ATC methodology that must be stated in the transmission provider's**

Attachment C. We direct any transmission provider that has failed to include this information in its Attachment C to include that information as part of the compliance filing directed in section II.C. If the transmission provider has already satisfied this obligation in a previous compliance filing, it should refer to that filing instead

BPA Comment: NAESB has already addressed this through standards including the 'ATC Information' link.

17. 150. WE DENY AS PREMATURE CONSTELLATION'S REQUEST TO REQUIRE OASIS POSTINGS OF ADDITIONAL MODEL BENCHMARKING AND FORECASTING DATA/TSR STUDY AUDIT DATA. SUCH INFORMATION WOULD BE UTILIZED IN THE PROCESS OF UPDATING AND BENCHMARKING MODELS TO ACTUAL EVENTS, WHICH IS THE SUBJECT OF ONGOING EFFORTS TO MODIFY RELEVANT RELIABILITY STANDARDS FROM THE MOD and facilities design, connections and maintenance (FAC) groups.

BPA Comment: NAESB should establish minimum requirements relating to data that must be posted to OASIS.

18. 152. We deny TDU Systems' request to require transmission providers to grant customers access to proprietary modeling software used to calculate ATC values. The Commission believes at this time that the requirements of Order No. 890 are sufficient to achieve the Commission's transparency goals without further requiring the disclosure of proprietary software.

BPA Comment: BPA agrees with the FERC Policy.

FERC Order 890 Determinations on ATC

Consistent Method of Measuring ATC Is Needed

...Final Rule adopts a number of reforms that address the potential for remaining undue discrimination in the determination of ATC by requiring consistency in how ATC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates ATC.

221. The Commission directs public utilities, working through NERC and NAESB, to modify the ATC-related reliability standards and business practices in accordance with specific direction provided in this Final Rule. As we explain above, the development of a more coherent and uniform determination of ATC across a region will help limit the potential for undue discrimination in the calculation of ATC. The Commission concludes that the NERC reliability standards development process and the NAESB business practices development process are the appropriate forums for developing this consistency.

Moreover, NAESB has a long history of developing standard business practices for the electric industry, on which the Commission has relied in various contexts. While other entities may bring certain benefits, commenters have not demonstrated the superiority of IEEE, a regional reliability organization, or a particular RTO over NERC and NAESB. Once components of ATC are made consistent and ATC calculation methodologies are made transparent, opportunities for discretion that may lead to undue discrimination in the calculation of ATC will be sufficiently eliminated to invalidate the need for the creation of independent entities to oversee that calculation.

BPA Comment: NAESB is recognized by FERC as the entity that should engage in the development of ATC standards that incorporate key principles into commercial regulatory rules::

- Transparency
- Consistency in ATC evaluation process
- Limit undue discrimination

To the extent that, even following the adoption of these reforms, customers have complaints regarding the calculations performed by individual transmission owners, they can be addressed on a case-by-case basis.

BPA Comment: Transmission Customers are to take individual and specific issues to FERC that are not addressed by the NERC and NAESB ATC standards.

223. With respect to a timeline for completion, the Commission concurs with NERC that a significant amount of work remains to be done on ATC-related reliability standards development

BPA Comment: NAESB should address the implementation of BPs to be tied to the FERC final adoption of the NERC MOD A project.