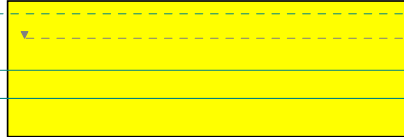


A. Introduction

1. **Title:** Procedure to resolve comments and questions regarding ATC and AFC Methodologies and Values

2. **Number:** MOD-003-1

3. **Purpose:** To promote the communication of Transmission Service Provider calculation methodologies and values used for calculating Available Transfer Capability (ATC) and Available Flowgate Capability (AFC) among Transmission Customers.



Comment: NAESB comment that this should be business practice; it only addresses and penalizes failures to communicate. Communication is typically a NAESB business practice development area. Failure to communicate to does not affect reliability of the system.

Comment: talking about values that go into the calculation or the actual calculated ATC/AFC value itself? Need clarification on this item.

4. Applicability:

4.1. Each Transmission Service Provider

4.1.1 Entity Limitations. Transmission Service Providers that are not required to have an OASIS may publish on a publicly available Web site the information discussed in the requirements and measurements sections of this standard.

Comment: are there non-jurisdictional entities that 4.1.1 would apply to?

5. **Effective Date:** t.b.d.

B. Requirements

R1. The Transmission Service Provider shall post on OASIS the telephone number and email address of a contact person to whom concerns are to be addressed regarding the AFC and the ATC methodologies and their associated numeric values. [Risk factor: t.b.d.]

NAESB is concerned about having two methods of contacting TSPs

Comment: The person who knows the methodology is not necessarily the same individual who contributes to the day to day ATC/AFC posting; posting of one e-mail address will not necessarily be sufficient for answering all questions. Comment: if expected to post new names with shift changes will be administrative burden for TP.

R2. Each Transmission Service Provider shall create on its OASIS an electronic data input ~~web form~~ for the specific purpose of receiving and responding to queries regarding the AFC and the ATC methodologies and their associated numeric values. [Risk factor: t.b.d.]

Comment: Need clarification whether standard would allow submission of question through e-mail as provided in R1 or only through OASIS posting as set forth in R2?

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NAESB thinks that this is a NAESB business practice

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Standard MOD-003-1 — Procedure to resolve comments and questions regarding ATC and AFC Methodologies and Values

Comment: If questions are accepted through e-mail are those also required to be posted on OASIS?

R3. Subject to commercial confidentiality constraints, within one week of the electronic receipt of a query received via the aforementioned ~~web form~~ in R2, the Transmission Service Provider shall post on OASIS an answer to the received query. [Risk factor: t.b.d]

NAESB will be asked to create a template(s) for OASIS postings for R1 – R3.

Comment: If NAESB develops template for posting and is not referenced in the NERC standard, does that mean this requirement lends itself to being adopted by NAESB?

Comment: R3 treats all queries equally. All queries must be responded to within a week. Some may take longer to respond to due to the nature of the query. Limitation of 1 week appears to be arbitrary. It is the understanding of the NAESB subcommittee that R3 only addresses queries submitted under R2.

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C. Measures

M1. The Transmission Service Provider shall have documentation that information required by MOD-003-1 R1 was posted on OASIS.

M2. The Transmission Service Provider shall provide ~~upon request~~ the internet location of the OASIS website containing the information required by MOD-003-1 R2.

M3. The Transmission Service Provider shall have documentation, such as a log, containing the information required by MOD-003-1 R3 demonstrating the timeframe within which the answer was provided.

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D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Compliance Monitor: NERC.

1.2. Compliance Monitoring Period and Reset Timeframe

Rolling 3 years

1.3. Data Retention

Rolling 3 years.

1.4. Additional Compliance Information

None.

2. Mitigation Time Horizon

2.1. Long-term planning – t.b.d.

2.2. Operations Planning - t.b.d.

2.3. Same-day Operation – t.b.d.

Standard MOD-003-1 — Procedure to resolve comments and questions regarding ATC and AFC Methodologies and Values

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2.4. Real-time Operations – t.b.d.

2.5. Operations Assessment – t.b.d.

3. Violation Severity Level

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3.1. Lower:

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1.3.1. R3: 1 to 5% of the inquiries received were not answered within 1 week during the prior twelve (12) months

3.2. Moderate:

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2.3.1. R3: more than 5% and up to and including 15% of the inquiries received were not answered within 1 week during the prior twelve (12) months

3.3. High:

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3.3.1. R3: more than 15% and up to and including 30% of the inquiries received were not answered within 1 week during the prior twelve (12) months

3.3.2. R1: Contact information is incorrect

3.4. Severe:

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4.3.1. R1: Contact information is not posted

4.3.2. R2: Inquiry form is not posted

4.3.3. R3: more than 5% of the inquiries were never responded to.

4.3.4. R3: more than 30% of the inquiries received were not answered within 1 week during the prior twelve (12) months.

Comment: Suggestion that a threshold needs to be established for those entities that have low numbers of inquiries.

Comment: There is no real definition what constitutes a valid query. There is potential for queue flooding with spurious queries.

Lohrman's Comment: Queries are for valid questions when denied: why ATC was what it was; rewrite language so that it says what the intent is: for queries to justify denial

E. Regional Differences

1. None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
<u>1</u>	<u>Dec 13, 2006</u>	<u>T.B.D</u>	<u>Revised</u>

Adopted by NERC Board of Trustees: February 8, 2005
Effective Date: April 1, 2005

Standard MOD-003-1 — Procedure to resolve comments and questions regarding ATC and AFC Methodologies and Values

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<u>1</u>	<u>January 22, 2007</u>	<u>T.B.D., applicability</u>	<u>Revised</u>

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Procedure for Input on

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TTC and

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Regional

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Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values

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the consistent and uniform application

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Transfer Capability

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among Transmission Service Providers, the Regional Reliability Organizations need to review adherence to Regional methodologies

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Total Transfer Capability (TTC) and

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Each Regional Reliability Organization, in conjunction with its members, shall develop and document a procedure on how transmission users can input their concerns or questions regarding the TTC and ATC methodology and values of the Transmission Service Provider(s), and how these concerns or questions will be addressed. The Regional Reliability Organization's procedure shall specify the following:

The name, telephone number and email address of a contact person to whom concerns are to be addressed.

The amount of time it will take for a response

The manner in which the response will be communicated (e.g., email, letter, telephone, etc).

What recourse a customer has if the response is deemed unsatisfactory.

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Regional Reliability Organization

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a web site that is accessible by the Regional Reliability Organizations, NERC, and transmission users,

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its procedure for receiving and addressing concerns about

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the TTC and ATC methodology and TTC and ATC values of member Transmission Service Providers

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