NORTH AMERICAN ENERGY STANDARDS BOARD
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August 25, 2014
Filed Electronically

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street N.E., Room 1A
Washington, D.C. 20426

RE: Federal Energy Regulatory Commission Modeling, Data, and Analysis Reliability Standards Notice of Proposed Rulemaking (Docket No. RM14-7-000)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") voluntarily submits this set of comments in response to the Notice of Proposed Rulemaking ("NOPR") issued by the Federal Energy Regulatory Commission ("FERC" or "Commission") on June 19, 2014 concerning the North American Electric Reliability Corporation's ("NERC") Modeling, Data, and Analysis Reliability Standards. These comments respond to specific Commission inquiries regarding the timeline for the development of related business practice standards and coordination with NERC.[1] Currently, the standards development process is anticipated to be eleven months in duration, which will accommodate the eighteen month implementation plan proposed by the Commission in the NOPR. Should there be unanticipated delays to the standards development process resulting in a postponement to the completion of the effort, NAESB is committed to working with the Commission and NERC to ensure a seamless implementation for the industry.

Respectfully submitted,

Rae McQuade

Ms. Rae McQuade
President & COO, North American Energy Standards Board

cc without enclosures: Chairman, Cheryl LaFleur, Federal Energy Regulatory Commission
Commissioner, Tony Clark, Federal Energy Regulatory Commission
Commissioner Philip D. Moeller, Federal Energy Regulatory Commission
Commissioner John Norris, Federal Energy Regulatory Commission
Commissioner Norman C. Bay, Federal Energy Regulatory Commission

Mr. Michael Bardee, Office of Electric Reliability, Federal Energy Regulatory Commission
Mr. David Morenoff, General Counsel of the Commission, Federal Energy Regulatory Commission

Mr. Michael Goldenberg, Senior Attorney, Office of General Counsel, Federal Energy Regulatory Commission

[1] Notice of Public Rulemaking, *Modeling, Data, and Analysis Reliability Standards*, 147 FERC ¶ 61, 208 at P.14 (2014).

Ms. Jamie L. Simler, Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Mr. Michael Desselle, Chairman and CEO, North American Energy Standards Board
Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Mr. Gerry W. Cauley, President and Chief Executive Officer, North American Electric Reliability Corporation
Mr. Mark Lauby, Senior Vice President and Chief Reliability Officer, North American Electric Reliability Corporation
Mr. Charles A. Berardesco, Senior Vice President, General Counsel, and Corporate Secretary, North American Electric Reliability Corporation

Enclosures (all documents and links are available publically on the NAESB website – www.naesb.org)

Appendix A	Matrix of Requirements Addressed by the NAESB Wholesale Electric Quadrant Executive Committee MOD Standard Scoping Task Force
Appendix B	List of NAESB Wholesale Electric Quadrant Executive Committee MOD Standard Scoping Task Force Participants
Appendix C	Links to Meeting Notes, Comments, Work Papers, and Voting Records
Appendix D	List of Executive Committee Minutes and Available Transcripts
Appendix E	NAESB Process to Develop and Adopt Standards
Appendix F	NAESB 2014 WEQ Annual Plan

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Modeling, Data, and Analysis Reliability Standards	**)**	**Docket No. RM 14-7-000**

The North American Energy Standards Board ("NAESB") is voluntarily submitting this set of comments with regard to the Federal Energy Regulatory Commission's ("FERC" or "Commission") June 19, 2014 request for comments on the "Modeling, Data, and Analysis Reliability Standards Notice of Proposed Rulemaking ("NOPR")" (Docket No. RM-14-7-000). In the NOPR, the Commission requested the submittal of comments by NAESB concerning the proposed eighteen month implementation plan and coordination efforts with the North American Electricity Reliability Corporation ("NERC") to ensure synchronization between the proposed retirement of NERC MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-1a, and MOD-030-2 ("MOD-A") Reliability Standards and the development of NAESB Wholesale Electric Quadrant ("WEQ") business practice standards that pertain to the commercial aspects of ATC calculations.[1] Based upon the current proposed timeline for standards development within NAESB, the proposed eighteen month implementation plan will provide an adequate length of time for NAESB to execute its standard development process. On February 10, 2014, NERC filed a petition with the Commission proposing the retirement of the NERC MOD-A Reliability Standards in favor of the proposed NERC MOD-001-2 Reliability Standard.[2] The proposed standard consolidates the existing requirements of the MOD-A Reliability Standards into a single standard by eliminating requirements that touch upon commercial aspects of the calculation of Available Transfer Capacity ("ATC") and Available Flowgate Capacity ("AFC"). To ensure the commercially relevant requirements are still maintained by the industry, NERC submitted a request for standards development to NAESB.[3] In its petition to the Commission, NERC proposed an eighteen month implementation plan to allow NAESB to develop any necessary business practice standards and make appropriate filings with the Commission. In the NOPR, the Commission requested comments "from NAESB and others

[1] Notice of Public Rulemaking, *Modeling, Data, and Analysis Reliability Standards*, 147 FERC ¶ 61, 208 at P.14 (2014) [hereinafter NOPR].
[2] See Petition of NERC for Approval of Reliability Standard MOD-001-2 and Retirement of Reliability Standards MOD-001-1a, MOD-004-1, MOD-008-1 MOD-028-2, MOD-029-1a, and MOD-030-2, available at the following link: http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Petition%20for%20MOD-001-2.pdf
[3] See NAESB Standards Request R14002, available at the following link: http://naesb.org/pdf4/r14002.pdf

whether 18 months from the date of Commission approval provides adequate time for NAESB to develop related business practices associated with ATC calculations or whether additional time may be appropriate to better assure synchronization of the effective dates for the proposed Reliability Standard and related NAESB practices."[4]

For almost a year, NERC and NAESB engaged in an open dialog concerning this effort, and on February 7, 2014, NERC submitted to NAESB a related request for standards development. The request identified over 200 requirements proposed for retirement from the NERC Reliability Standards and noted 174 requirements that may be essential for market or commercial purposes. The request was discussed by the WEQ EC during the February 18, 2014 meeting, and due to the large nature of the request, the chair of the WEQ EC formed the WEQ EC MOD Standard Scoping Task Force.[5] The WEQ EC charged the task force with evaluating the requirements proposed for inclusion as potential NAESB WEQ business practice standards for the purpose of recommending a defined scope and timeline for the standards development process. Task force participants included numerous industry volunteers as well as NERC and FERC staff members. The task force held its initial meeting on April 10, 2014 to begin review of the requirements. Following the meeting, the task force held a comment period seeking input from task force and other interested parties regarding the disposition of the requirements, resulting in the submittal of comments by eight entities. The task force held six subsequent meetings to review the comments and each of the requirements to determine if any element of a requirement had a commercial implication that should be addressed through standardization by NAESB. During the final meeting on August 1, 2014, the WEQ EC MOD Scoping Task Force approved a recommended timeline for completion and scope of work for the proposed standards development. The task force recommended forty-one requirements for consideration by the NAESB WEQ Business Practices Subcommittee ("BPS") for potential standards development and a tentative 2nd Quarter 2015 completion date. Currently, the standards development effort is associated with NAESB WEQ 2014 Annual Plan Item 1.h.

The NAESB WEQ BPS held initial discussions on the standards development assignment during its August 6 – 7, 2014 meeting, and during its September 3 – 4, 2014 meeting, anticipates beginning work on the standards request within the scope defined by the task force. It is expected that any business practice standards resulting from the effort will be maintained as a new section of the WEQ portion of the NAESB Business Practice Standards. Following the approval of a recommendation on the proposed standards, as well as any related modifications to existing standards, by the NAESB WEQ BPS, the recommendation will then be distributed for a thirty-day formal industry comment period prior to the recommendation's submittal to the NAESB WEQ EC for consideration. If the recommendation is approved by the WEQ EC, it will be submitted to the NAESB WEQ membership for a thirty-day ratification period. Assuming work on the recommendation is completed within the estimated timeline, NAESB will submit any resulting standards to the Commission in September 2015. Based upon the current schedule for standards development, NAESB will require a minimum of twelve months for the standards development process, potentially leaving six additional months prior to NERC's proposed implementation date eighteen months after the

[4] NOPR *supra* note 1.
[5] See February 18, 2014 NAESB WEQ Executive Committee Final Minutes, available at the following link: http://naesb.org/pdf4/weq_ec021814fm.docx

Commission's final order. The timeline for the standards development process was discussed with the co-chairs of the NAESB WEQ BPS prior to the task force's recommendation and inclusion in the proposed NAESB WEQ 2014 Annual Plan. Although the co-chairs and WEQ Executive Committee participants have indicated that the proposed completion date is achievable, they have recognized that the standards development effort may prove challenging due to the nature of the requirements and that the recommended timeline provides little room for unanticipated delays. In the event of any unexpected delays resulting in the postponement of completion within the currently anticipated timeline, NAESB will immediately alert both NERC and the Commission to resolve any synchronization issues that may be presented.

Attached, please find seven enclosures supporting these comments. Provided in Appendix A is the Matrix of Requirements Addressed by the NAESB Wholesale Electric Quadrant Executive Committee MOD Standard Scoping Task Force which contains the text of each NERC requirement the task force reviewed as well as a disposition for the requirement by the task force. Provided in Appendix B is a list of the NAESG WEQ EC MOD Standard Scoping Task Force participants. Provided in Appendix C are links to meeting notes, comments, work papers, and voting records for the task force. Provided in Appendix D is a list of WEQ EC minutes and available transcripts. Provided in Appendix E is an overview of the process NAESB utilizes to develop standards. Provided in Appendix F is the current NAESB 2014 WEQ Annual Plan.

NAESB appreciates the opportunity to provide these comments to the Commission and is eager to support the Commission's direction in the manner deemed appropriate by the Commission.

Appendices

Appendices:

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 1: 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] the Area Interchange Methodology, as described in MOD-028, the Rated System Path Methodology, as described in MOD-029, and the Flowgate Methodology, as described in MOD-030	NAESB should consider whether its business practice standards should list the methodologies that entities may use for determining ATC/AFC.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The NAESB standards should recognize the three methodologies from NERC and require selection of one of the methodologies for ATC calculations.
MOD-001-1a Requirement 2: 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]	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).	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should consult 18 CFR 27.6.b.3.i.1-2, which has requirements for posting.
MOD-001-1a Requirement 2.1: Hourly values for at least the next 48 hours	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).	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should consult 18 CFR 27.6.b.3.i.1-2, which has requirements for posting.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 2.2: Daily values for at least the next 31 calendar days	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).	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should consult 18 CFR 27.6.b.3.i.1-2, which has requirements for posting.
MOD-001-1a Requirement 2.3: Monthly values for at least the next 12 months (months 2-13)	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).	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should consult 18 CFR 27.6.b.3.i.1-2, which has requirements for posting.
MOD-001-1a Requirement 3: Each Transmission Service Provider shall prepare and keep current an Available Transfer Capability Implementation Document (ATCID) that includes, at a minimum, the following information: [Time Horizon: Operations Planning]	N/A	N/A
MOD-001-1a Requirement 3.1: Information describing how the selected methodology (or methodologies) has been implemented, in such detail that, given the same information used by the Transmission Service Provider, the results of the ATC or AFC calculations can be validated.	NAESB should consider whether to include this type of requirement in its standards if needed for market purposes.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The task force would like the subcommittee to consider whether this requirement is needed as a business practice separate from the ATCID and the ATC Contact. The subcommittee should discuss if details for prescribed NERC documents should be in NAESB standards, and if so, what NERC coordination may be required.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 3.2: A description of the manner in which the Transmission Service Provider will account for counterflows including:	NAESB to consider whether market standards are needed to address how an entity accounts for Counterflows.	The subcommittee should not consider this requirement in the standards development process. The level of detail contained in MOD-001-1a Requirement 3.1, which is proposed for potential inclusion in the NAESB WEQ Business Practice Standards, is sufficient.
MOD-001-1a Requirement 3.2.1: How confirmed Transmission reservations, expected Interchange and internal counterflow are addressed in firm and non-firm ATC or AFC calculations.	NAESB to consider whether market standards are needed to address how an entity accounts for Counterflows.	The subcommittee should not consider this requirement in the standards development process. The level of detail contained in MOD-001-1a Requirement 3.1, which is proposed for potential inclusion in the NAESB WEQ Business Practice Standards, is sufficient.
MOD-001-1a Requirement 3.2.2: A rationale for that accounting specified in R3.2.	NAESB to consider whether market standards are needed to address how an entity accounts for Counterflows.	The subcommittee should not consider this requirement in the standards development process. The level of detail contained in MOD-001-1a Requirement 3.1, which is proposed for potential inclusion in the NAESB WEQ Business Practice Standards, is sufficient.
MOD-001-1a Requirement 3.3: The identity of the Transmission Operators and Transmission Service Providers from which the Transmission Service Provider receives data for use in calculating ATC or AFC.	NAESB to consider whether there is a market need to require entities to specifically document the identify of TOPs and TSPs from which they receive data.	The subcommittee should not consider this requirement in the standards development process. The level of detail contained in MOD-001-1a Requirement 3.1, which is proposed for potential inclusion in the NAESB WEQ Business Practice Standards, is sufficient.
MOD-001-1a Requirement 3.4: The identity of the Transmission Service Providers and Transmission Operators to which it provides data for use in calculating transfer or Flowgate capability.	NAESB to consider whether there is a market need to require entities to specifically document the identify of TOPs and TSPs from which they receive data.	The subcommittee should not consider this requirement in the standards development process. The level of detail contained in MOD-001-1a Requirement 3.1, which is proposed for potential inclusion in the NAESB WEQ Business Practice Standards, is sufficient.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 3.5: A description of the allocation processes listed below that are applicable to the Transmission Service Provider: • Processes used to allocate transfer or Flowgate capability among multiple lines or sub-paths within a larger ATC Path or Flowgate. • Processes used to allocate transfer or Flowgate capabilities among multiple owners or users of an ATC Path or Flowgate. • Processes used to allocate transfer or Flowgate capabilities between Transmission Service Providers to address issues such as forward looking congestion management and seams coordination.	NAESB should consider whether there is a market need to specifically require such a description in its standards.	The subcommittee should not consider this requirement in the standards development process. The level of detail contained in MOD-001-1a Requirement 3.1, which is proposed for potential inclusion in the NAESB WEQ Business Practice Standards, is sufficient.
MOD-001-1a Requirement 3.6: A description of how generation and transmission outages are considered in transfer or Flowgate capability calculations, including:	N/A	N/A
MOD-001-1a Requirement 3.6.1: The criteria used to determine when an outage that is in effect part of a day impacts a daily calculation.	NAESB should consider these aspects of outages and how they affect markets.	The subcommittee should not consider this requirement in the standards development process. The level of detail contained in MOD-001-1a Requirement 3.1, which is proposed for potential inclusion in the NAESB WEQ Business Practice Standards, is sufficient.
MOD-001-1a Requirement 3.6.2: The criteria used to determine when an outage that is in effect part of a month impacts a monthly calculation	NAESB should consider these aspects of outages and how they affect markets.	The subcommittee should not consider this requirement in the standards development process. The level of detail contained in MOD-001-1a Requirement 3.1, which is proposed for potential inclusion in the NAESB WEQ Business Practice Standards, is sufficient.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 3.6.3: How outages from other Transmission Service Providers that cannot be mapped to the Transmission model used to calculate transfer or Flowgate capability are addressed.	NAESB should consider these aspects of outages and how they affect markets.	The subcommittee should not consider this requirement in the standards development process. The level of detail contained in MOD-001-1a Requirement 3.1, which is proposed for potential inclusion in the NAESB WEQ Business Practice Standards, is sufficient.
MOD-001-1a Requirement 6: 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]	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 degrees of similarity to the planning of operations. While a comparison between the two may be of merit to insure that there is no inappropriate conduct, a hard limit has the potential to create a situation where the entity must choose between violating a NERC Standard or violating a NAESB standard.	The subcommittee should not consider this requirement in the standards development process. The task force believes the Transmission Operator is responsible for calculating TTC and TFC for reliability purposes and therefore should not be used in commercial standards.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 7: 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 studied, providing such planning of operations has been performed for that time period. [Time Horizon: Operations Planning]	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 degrees of similarity to the planning of operations. While a comparison between the two may be of merit to insure that there is no inappropriate conduct, a hard limit has the potential to create a situation where the entity must choose between violating a NERC Standard or violating a NAESB standard.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The task force is in agreement that the language "assumptions no more limiting than…" should not be included in any commercial business practice standard. The subcommittee may consider if there should be language for the assumptions and data used for operation planning and ATC calculations to be consistent. (Please refer to Order 693 Paragraph 1044)
MOD-001-1a Requirement 8: 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]	NAESB should review this requirement and determine if there is a business need to establish calculation frequencies for ATC.	The subcommittee should not consider this requirement in the standards development process. This requirement touches upon the calculation portion of ATC. FERC has indicated that a customer can request calculation information from providers if there are questions. This requirement is overly prescriptive, would require significant documentation to show compliance, and would not provide any additional business value. Posting requirements can be audited because all postings on OASIS have time stamps.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 8.1: 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.	NAESB should review this requirement and determine if there is a business need to limit or qualify permissible computer down time.	The subcommittee should not consider this requirement in the standards development process. This requirement touches upon the calculation portion of ATC. FERC has indicated that a customer can request calculation information from providers if there are questions. This requirement is overly prescriptive, would require significant documentation to show compliance, and would not provide any additional business value. Posting requirements can be audited because all postings on OASIS have time stamps.
MOD-00101a Requirement 8.2: Daily values, once per day.	NAESB should review this requirement and determine if there is a business need to establish calculation frequencies for ATC.	The subcommittee should not consider this requirement in the standards development process. This requirement touches upon the calculation portion of ATC. FERC has indicated that a customer can request calculation information from providers if there are questions. This requirement is overly prescriptive, would require significant documentation to show compliance, and would not provide any additional business value. Posting requirements can be audited because all postings on OASIS have time stamps.
MOD-001-1a Requirement 8.3: Monthly values, once per week	NAESB should review this requirement and determine if there is a business need to establish calculation frequencies for ATC.	The subcommittee should not consider this requirement in the standards development process. This requirement touches upon the calculation portion of ATC. FERC has indicated that a customer can request calculation information from providers if there are questions. This requirement is overly prescriptive, would require significant documentation to show compliance, and would not provide any additional business value. Posting requirements can be audited because all postings on OASIS have time stamps.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 9: Within thirty calendar days of receiving a request by any Transmission Service Provider, Planning Coordinator, Reliability Coordinator, or Transmission Operator for data from the list below solely for use in the requestor's ATC or AFC calculations, each Transmission Service Provider receiving said request shall begin to make the requested data available to the requestor, subject to the conditions specified in R9.1 and R9.2: [Time Horizon: Operations Planning] Truncated. (Detailed list of items removed for brevity.)	Proposed MOD-001-2 Requirement 6 covers data sharing. The requirements are detailed in what the requesting entity must do and what the entity responding must do. There is still a time parameter for responding to requests within 45 calendar days. These cells are marked for consideration because the requirement parts are not clearly spelled out.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 6 covers all types of data sharing as do requirements in the CFR.
MOD-001-1a Requirement 9.1: The Transmission Service Provider shall make its own current data available, in the format maintained by the Transmission Service Provider, for up to 13 months into the future (subject to confidentiality and security requirements).	Proposed MOD-001-2 Requirement 6 covers data sharing. The requirements are detailed in what the requesting entity must do and what the entity responding must do. There is still a time parameter for responding to requests within 45 calendar days. These cells are marked for consideration because the requirement parts are not clearly spelled out.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 6 covers all types of data sharing as do requirements in the CFR.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 9.1.1: If the Transmission Service Provider uses the data requested in its transfer or Flowgate capability calculations, it shall make the data used available	Proposed MOD-001-2 Requirement 6 covers data sharing. The requirements are detailed in what the requesting entity must do and what the entity responding must do. There is still a time parameter for responding to requests within 45 calendar days. These cells are marked for consideration because the requirement parts are not clearly spelled out.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 6 covers all types of data sharing as do requirements in the CFR.
MOD-001-1a Requirement 9.1.2: If the Transmission Service Provider does not use the data requested in its transfer or Flowgate capability calculations, but maintains that data, it shall make that data available	Proposed MOD-001-2 Requirement 6 covers data sharing. The requirements are detailed in what the requesting entity must do and what the entity responding must do. There is still a time parameter for responding to requests within 45 calendar days. These cells are marked for consideration because the requirement parts are not clearly spelled out.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 6 covers all types of data sharing as do requirements in the CFR.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-001-1a Requirement 9.1.3: If the Transmission Service Provider does not use the data requested in its transfer or Flowgate capability calculations, and does not maintain that data, it shall not be required to make that data available	Proposed MOD-001-2 Requirement 6 covers data sharing. The requirements are detailed in what the requesting entity must do and what the entity responding must do. There is still a time parameter for responding to requests within 45 calendar days. These cells are marked for consideration because the requirement parts are not clearly spelled out.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 6 covers all types of data sharing as do requirements in the CFR.
MOD-001-1a Requirement 9.2: This data shall be made available by the Transmission Provider on the schedule specified by the requestor (but no more frequently than once per hour, unless mutually agreed to by the requester and the provider).	Proposed MOD-001-2 Requirement 6 covers data sharing. The requirements are detailed in what the requesting entity must do and what the entity responding must do. There is still a time parameter for responding to requests within 45 calendar days. These cells are marked for consideration because the requirement parts are not clearly spelled out.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 6 covers all types of data sharing as do requirements in the CFR.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 1: The Transmission Service Provider that maintains CBM shall prepare and keep current a "Capacity Benefit Margin Implementation Document" (CBMID) that includes, at a minimum, the following information: [Time Horizon: Operations Planning, Long-term Planning]	N/A	N/A
MOD-004-1 Requirement 1.1: 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.	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 subcommittee should not consider this requirement in the standards development process. The task force does not believe that business practices are needed, as the NERC standard covers criteria for the CBMID. The NAESB standards will retain the reference for posting the document in WEQ-001-13.1.5
MOD-004-1 Requirement 1.2: The procedure and assumptions for establishing CBM for each Available Transfer Capability (ATC) Path or Flowgate.	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 subcommittee should not consider this requirement in the standards development process. The task force does not believe that business practices are needed, as the NERC standard covers criteria for the CBMID. The NAESB standards will retain the reference for posting the document in WEQ-001-13.1.5
MOD-004-1 Requirement 1.3: 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.	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 subcommittee should not consider this requirement in the standards development process. The task force does not believe that business practices are needed, as the NERC standard covers criteria for the CBMID. The NAESB standards will retain the reference for posting the document in WEQ-001-13.1.5

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 2: The Transmission Service Provider that maintains CBM shall make available its current CBMID to the Transmission Operators, Transmission Service Providers, Reliability Coordinators, Transmission Planners, Resource Planners, and Planning Coordinators that are within or adjacent to the Transmission Service Provider's area, and to the Load Serving Entities and Balancing Authorities within the Transmission Service Provider's area, and notify those entities of any changes to the CBMID prior to the effective date of the change. [Time Horizon: Operations Planning]	The requirement to send an unsolicited communication to various entitles was removed based on industry feedback that this requirement did not contribute to reliability and presented an administrative burden. However, NAESB should consider if this has market implications.	The subcommittee should not consider this requirement in the standards development process. There is already a requirement to post the CBMID. The task force agrees with NERC that the required posting of the CBMID constitutes notification.
MOD-004-1 Requirement 3: Each Load-Serving Entity determining the need for Transmission capacity to be set aside as CBM for imports into a Balancing Authority Area shall determine that need by: [Time Horizon: Operations Planning]	N/A	N/A
MOD-004-1 Requirement 3.1: Using one or more of the following to determine the GCIR: Loss of Load Expectation (LOLE) studies, Loss of Load Probability (LOLP) studies, Deterministic risk-analysis studies, Reserve margin or resource adequacy requirements established by other entities, such as municipalities, state commissions, regional transmission organizations, independent system operators, and/or Regional Reliability Organizations, or regional entities	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 3.2: Identifying expected import path(s) or source region(s).	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7
MOD-004-1 Requirement 4: Each Resource Planner determining the need for Transmission capacity to be set aside as CBM for imports into a Balancing Authority Area shall determine that need by: [Time Horizon: Operations Planning]	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7
MOD-004-1 Requirement 4.1: Using one or more of the following to determine the GCIR: Loss of Load Expectation (LOLE) studies, Loss of Load Probability (LOLP) studies, Deterministic risk-analysis studies, and/or Reserve margin or resource adequacy requirements established by other entities, such as municipalities, state commissions, regional transmission organizations, independent system operators, Regional Reliability Organizations, or regional entities	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 4.2: Identifying expected import path(s) or source region(s).	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7
MOD-004-1 Requirement 5: At least every 13 months, the Transmission Service Provider that maintains CBM shall establish a CBM value for each ATC Path or Flowgate to be used for ATC or Available Flowgate Capability (AFC) calculations during the 13 full calendar months (months 2-14) following the current month (the month in which the Transmission Service Provider is establishing the CBM values). This value shall: [Time Horizon: Operations Planning]	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 5.1: Reflect consideration of each of the following if available: Any studies (as described in R3.1) performed by Load-Serving Entities for loads within the Transmission Service Provider's area, any studies (as described in R4.1) performed by Resource Planners for loads within the Transmission Service Provider's area, and any reserve margin or resource adequacy requirements for loads within the Transmission Service Provider's area established by other entities, such as municipalities, state commissions, regional transmission organizations, independent system operators, Regional Reliability Organizations, or regional entities	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7
MOD-004-1 Requirement 5.2: Be allocated as follows: • For ATC Paths, based on the expected import paths or source regions provided by Load-Serving Entities or Resource Planners • For Flowgates, based on the expected import paths or source regions provided by Load-Serving Entities or Resource Planners and the distribution factors associated with those paths or regions, as determined by the Transmission Service Provider	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 6: At least every 13 months, the Transmission Planner shall establish a CBM value for each ATC Path or Flowgate to be used in planning during each of the full calendar years two through ten following the current year (the year in which the Transmission Planner is establishing the CBM values). This value shall: [Time Horizon: Long-term Planning]	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7
MOD-004-1 Requirement 6.1: Reflect consideration of each of the following if available: any studies (as described in R3.1) performed by Load-Serving Entities for loads within the Transmission Planner's area, any studies (as described in R4.1) performed by Resource Planners for loads within the Transmission Planner's area, and any reserve margin or resource adequacy requirements for loads within the Transmission Planner's area established by other entities, such as municipalities, state commissions, regional transmission organizations, independent system operators, Regional Reliability Organizations, or regional entities	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 6.2: Be allocated as follows: • For ATC Paths, based on the expected import paths or source regions provided by Load-Serving Entities or Resource Planners • For Flowgates, based on the expected import paths or source regions provided by Load-Serving Entities or Resource Planners and the distribution factors associated with those paths or regions, as determined by the Transmission Planner.	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 subcommittee should not consider this requirement in the standards development process. The proposed NERC standard covers criteria for the CBMID, and NAESB will retain the reference for posting the document in WEQ-001-13.1.7
MOD-004-1 Requirement 7: Less than 31 calendar days after the establishment of CBM, the Transmission Service Provider that maintains CBM shall notify all the Load-Serving Entities and Resource Planners that determined they had a need for CBM on the Transmission Service Provider's system of the amount of CBM set aside. [Time Horizon: Operations Planning]	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more guidelines for communicating CBM values to those utilities that use it.	The subcommittee should not consider this requirement in the standards development process. The task force believes that there are already OASIS Business Practice Standards (WEQ-001-22) that enables Load Serving Entities to determine the available CBM in addition to requirements in the CFR (b.3.i.a.1). The task force does not believe that additional business practices are needed.
MOD-004-1 Requirement 8: Less than 31 calendar days after the establishment of CBM, the Transmission Planner shall notify all the Load-Serving Entities and Resource Planners that determined they had a need for CBM on the system being planned by the Transmission Planner of the amount of CBM set aside. [Time Horizon: Operations Planning]	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more guidelines for communicating CBM values to those utilities that use it.	The subcommittee should not consider this requirement in the standards development process. The task force believes that there are already OASIS Business Practice Standards (WEQ-001-22) that enable Load Serving Entities to determine the available CBM in addition to requirements in the CFR (b.3.i.a.1). The task force does not believe that additional business practices are needed.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 9: The Transmission Service Provider that maintains CBM and the Transmission Planner shall each provide (subject to confidentiality and security requirements) copies of the applicable supporting data, including any models, used for determining CBM or allocating CBM over each ATC Path or Flowgate to the following: [Time Horizon: Operations Planning, Long-term Planning]	MOD-001-2 Proposed Requirement 5 requires disclosure of CBMID and response to any clarifying questions. MOD-001-2 Proposed Requirement 6 requires disclosure of data to another TSP or TOP.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 5 covers all types of data sharing as do requirements in the CFR. The task force does not want to create a double jeopardy situation. The subcommittee should not consider this requirement in the standards development process.
MOD-004-1 Requirement 9.1: Each of its associated Transmission Operators within 30 calendar days of their making a request for the data.	MOD-001-2 Proposed Requirement 5 requires disclosure of CBMID and response to any clarifying questions. MOD-001-2 Proposed Requirement 6 requires disclosure of data to another TSP or TOP.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 5 covers all types of data sharing as do requirements in the CFR. The task force does not want to create a double jeopardy situation. The subcommittee should not consider this requirement in the standards development process.
MOD-004-1 Requirement 9.2: To any Transmission Service Provider, Reliability Coordinator, Transmission Planner, Resource Planner, or Planning Coordinator within 30 calendar days of their making a request for the data.	MOD-001-2 Proposed Requirement 5 requires disclosure of CBMID and response to any clarifying questions. MOD-001-2 Proposed Requirement 6 requires disclosure of data to another TSP or TOP.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 5 covers all types of data sharing as do requirements in the CFR. The task force does not want to create a double jeopardy situation. The subcommittee should not consider this requirement in the standards development process.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 10: The Load-Serving Entity or Balancing Authority shall request to import energy over firm Transfer Capability set aside as CBM only when experiencing a declared NERC Energy Emergency Alert (EEA) 2 or higher. [Time Horizon: Same-day Operations]	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more guidelines for communicating CBM values to those utilities that use it.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. This requirement is partially defined in WEQ-001-22, but the subcommittee should consider adding criteria for EEA 2 or higher. The subcommittee should avoid establishing additional requirements for NERC established documents and will need to coordinate with requirements in WEQ-001-22 and WEQ-004 as well as requirements found in implementation documentation and the NERC BAL Reliability Standards.
MOD-004-1 Requirement 11: When reviewing an Arranged Interchange using CBM, all Balancing Authorities and Transmission Service Providers shall waive, within the bounds of reliable operation, any Real-time timing and ramping requirements. [Time Horizon: Same-day Operations]	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more guidelines for communicating CBM values to those utilities that use it.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. This requirement is partially defined in WEQ-001-22, but the subcommittee should consider adding criteria for EEA 2 or higher. The subcommittee should avoid establishing additional requirements for NERC established documents and will need to coordinate with requirements in WEQ-001-22 and WEQ-004 as well as requirements found in implementation documentation and the NERC BAL Reliability Standards.
MOD-004-1 Requirement 12: 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]	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more guidelines for communicating CBM values to those utilities that use it.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. This requirement is partially defined in WEQ-001-22, but the subcommittee should consider adding criteria for EEA 2 or higher. The subcommittee should avoid establishing additional requirements for NERC established documents and will need to coordinate with requirements in WEQ-001-22 and WEQ-004 as well as requirements found in implementation documentation and the NERC BAL Reliability Standards.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 12.1: The CBM is available	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more guidelines for communicating CBM values to those utilities that use it.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. This requirement is partially defined in WEQ-001-22, but the subcommittee should consider adding criteria for EEA 2 or higher. The subcommittee should avoid establishing additional requirements for NERC established documents and will need to coordinate with requirements in WEQ-001-22 and WEQ-004 as well as requirements found in implementation documentation and the NERC BAL Reliability Standards.
MOD-004-1 Requirement 12.2: The EEA 2 is declared within the Balancing Authority Area of the "energy deficient entity," and	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more guidelines for communicating CBM values to those utilities that use it.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. This requirement is partially defined in WEQ-001-22, but the subcommittee should consider adding criteria for EEA 2 or higher. The subcommittee should avoid establishing additional requirements for NERC established documents and will need to coordinate with requirements in WEQ-001-22 and WEQ-004 as well as requirements found in implementation documentation and the NERC BAL Reliability Standards.
MOD-004-1 Requirement 12.3: The Load of the "energy deficient entity" is located within the Transmission Service Provider's area.	NAESB should review MOD-004 and determine if there is a business need for NAESB to establish one or more guidelines for communicating CBM values to those utilities that use it.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. This requirement is partially defined in WEQ-001-22, but the subcommittee should consider adding criteria for EEA 2 or higher. The subcommittee should avoid establishing additional requirements for NERC established documents and will need to coordinate with requirements in WEQ-001-22 and WEQ-004 as well as requirements found in implementation documentation and the NERC BAL Reliability Standards.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-008-1 Requirement 1: Each Transmission Operator shall prepare and keep current a TRM Implementation Document (TRMID) that includes, as a minimum, the following information: [Time Horizon: Operations Planning]	N/A	N/A
MOD-008-1 Requirement 1.1: 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.	NAESB should review MOD-008-1 for identifying the elements in the previous column, at a minimum, within the TOPs TRMID.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 4 requires Transmission Operators to develop and post TRMIDs. TRM is also a requirement of Transmission Operators under NERC reliability standards. As such, the task force does not believe additional business practice standards are required.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 1.2: The description of the method used to allocate TRM across ATC Paths or Flowgates.	NAESB should review MOD-008-1 for identifying the elements in the previous column, at a minimum, within the TOPs TRMID.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 4 requires Transmission Operators to develop and post TRMIDs. TRM is also a requirement of Transmission Operators under NERC reliability standards. As such, the task force does not believe additional business practice standards are required.
MOD-004-1 Requirement 1.3: The identification of the TRM calculation used for the following time periods:	NAESB should review MOD-008-1 for identifying the elements in the previous column, at a minimum, within the TOPs TRMID.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 4 requires Transmission Operators to develop and post TRMIDs. TRM is also a requirement of Transmission Operators under NERC reliability standards. As such, the task force does not believe additional business practice standards are required.
MOD-004-1 Requirement 1.3.1: Same day and real-time.	NAESB should review MOD-008-1 for identifying the elements in the previous column, at a minimum, within the TOPs TRMID.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 4 requires Transmission Operators to develop and post TRMIDs. TRM is also a requirement of Transmission Operators under NERC reliability standards. As such, the task force does not believe additional business practice standards are required.
MOD-004-1 Requirement 1.3.2: Day-ahead and pre-schedule.	NAESB should review MOD-008-1 for identifying the elements in the previous column, at a minimum, within the TOPs TRMID.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 4 requires Transmission Operators to develop and post TRMIDs. TRM is also a requirement of Transmission Operators under NERC reliability standards. As such, the task force does not believe additional business practice standards are required.
MOD-004-1 Requirement 1.3.3: Beyond day-ahead and pre-schedule, up to thirteen months ahead.	NAESB should review MOD-008-1 for identifying the elements in the previous column, at a minimum, within the TOPs TRMID.	The subcommittee should not consider this requirement in the standards development process. The task force believes that proposed MOD-001-2 Requirement 4 requires Transmission Operators to develop and post TRMIDs. TRM is also a requirement of Transmission Operators under NERC reliability standards. As such, the task force does not believe additional business practice standards are required.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-004-1 Requirement 2: Each Transmission Operator shall only use the components of uncertainty from R1.1 to establish TRM, and shall not include any of the components of Capacity Benefit Margin (CBM). Transmission capacity set aside for reserve sharing agreements can be included in TRM. [Time Horizon: Operations Planning]	NAESB should review and determine if a business practice rule is needed regarding the double counting of CBM and TRM and could develop specific measures to test for such double counting.	The subcommittee should consider the requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement to determine if measures should be included in the NAESB standards to prevent double counting.
MOD-008-1 Requirement 4: 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.	The subcommittee should not consider this requirement in the standards development process. The Task Force believes this requirement is already established by the TRMID and as such, a requirement in the NAESB standards is not needed.
MOD-008-1 Requirement 5: 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.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards.
MOD-028-1 Requirement 1: Each Transmission Service Provider shall include in its Available Transfer Capability Implementation Document (ATCID), at a minimum, the following information relative to its methodology for determining Total Transfer Capability (TTC): [Time Horizon: Operations Planning]	N/A	N/A

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 1.1: Information describing how the selected methodology has been implemented, in such detail that, given the same information used by the Transmission Operator, the results of the TTC calculations can be validated.	NAESB should consider this information.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 1.2: A description of the manner in which the Transmission Operator will account for Interchange Schedules in the calculation of TTC.	NAESB should consider adding this description.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 1.3: Any contractual obligations for allocation of TTC.	NAESB should consider any contractual obligation for allocation of TTC.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 1.4:	NAESB should consider this description.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 1.5: The following information on how source and sink for transmission service is accounted for in ATC calculations including:	NAESB should consider this accounting of.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 1.5.1: Define if the source used for Available Transfer Capability (ATC) calculations is obtained from the source field or the Point of Receipt (POR) field of the transmission reservation	NAESB should consider this definition.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 1.5.2: Define if the sink used for ATC calculations is obtained from the sink field or the Point of Delivery (POD) field of the transmission reservation	NAESB should consider this definition.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 1.5.3: The source/sink or POR/POD identification and mapping to the model.	NAESB should consider this identification.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 1.5.4: If the Transmission Service Provider's ATC calculation process involves a grouping of generation, the ATCID must identify how these generators participate in the group.	NAESB should consider this identification.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 2: When calculating TTC for ATC Paths, the Transmission Operator shall use a Transmission model that contains all of the following: [Time Horizon: Operations Planning]	N/A	N/A

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 2.1: Modeling data and topology of its Reliability Coordinator's area of responsibility. Equivalent representation of radial lines and facilities 161 kV or below is allowed.	NAESB should consider this area for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 2.2: Modeling data and topology (or equivalent representation) for immediately adjacent and beyond Reliability Coordination areas.	NAESB should consider these areas for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 3: When calculating TTCs for ATC Paths, the Transmission Operator shall include the following data for the Transmission Service Provider's area. The Transmission Operator shall also include the following data associated with Facilities that are explicitly represented in the Transmission model, as provided by adjacent Transmission Service Providers and any other Transmission Service Providers with which coordination agreements have been executed: [Time Horizon: Operations Planning]	NAESB should consider these areas for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 3.1: For on-peak and off-peak intra-day and next-day TTCs, use the following (as well as any other values and additional parameters as specified in the ATCID):	N/A	N/A

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 3.1.1: Expected generation and Transmission outages, additions, and retirements, included as specified in the ATCID.	NAESB should consider whether to be specific in its TTC calculations for on-peak and off-peak intra-day and next-day TTCs.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 3.1.2: Load forecast for the applicable period being calculated.	NAESB should consider whether to be specific in its TTC calculations for on-peak and off-peak intra-day and next-day TTCs.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 3.1.3: Unit commitment and dispatch order, to include all designated network resources and other resources that are committed or have the legal obligation to run, (within or out of economic dispatch) as they are expected to run.	NAESB should consider whether to include all designated network resources that are committed or have the legal obligation to run in a business practice.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 3.2: For days two through 31 TTCs and for months two through 13 TTCs, use the following (as well as any other values and internal parameters as specified in the ATCID):	N/A	N/A
MOD-028-1 Requirement 3.2.1: Expected generation and Transmission outages, additions, and Retirements, included as specified in the ATCID.	NAESB should consider whether to be specific in its TTC calculations for days two through 31 and months two through 13.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-28-1 Requirement 3.2.2: Daily load forecast for the days two through 31 TTCs being calculated and monthly forecast for months two through 13 months TTCs being calculated.	NAESB should consider whether to be specific in its TTC calculations for days two through 31 and months two through 13.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 3.2.3: Unit commitment and dispatch order, to include all designated network resources and other resources that are committed or have the legal obligation to run, (within or out of economic dispatch) as they are expected to run.	NAESB should consider whether to include all designated network resources that are committed or have the legal obligation to run in a business practice.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 4: When calculating TTCs for ATC Paths, the Transmission Operator shall meet all of the following conditions: [Time Horizon: Operations Planning]	N/A	N/A
MOD-028-1 Requirement 4.2: Respect any contractual allocations of TTC.	NAESB should review and determine if rules are needed for respecting contractual allocations. However considering that a "contractual allocations" implies there is already a contract or agreement in place, further regulation of that agreement may be unnecessary.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 4.3: Include, for each time period, the Firm Transmission Service expected to be scheduled as	NAESB should review and determines if rules are needed for the elements listed in 4.3.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
specified in the ATCID (filtered to reduce or eliminate duplicate impacts from transactions using Transmission service from multiple Transmission Service Providers) for the Transmission Service Provider, all adjacent Transmission Service Providers, and any Transmission Service Providers with which coordination agreements have been executed modeling the source and sink as follows: • If the source, as specified in the ATCID, has been identified in the reservation and it is discretely modeled in the Transmission Service Provider's Transmission model, use the discretely modeled point as the source. • If the source, as specified in the ATCID, has been identified in the reservation and the point can be mapped to an "equivalence" or "aggregate representation" in the Transmission Service Provider's Transmission model, use the modeled equivalence or aggregate as the source. • If the source, as specified in the ATCID, has been identified in the reservation and the point cannot be mapped to a discretely modeled point, an "equivalence," or an "aggregate representation" in the Transmission Service Provider's Transmission model, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider from which the power is to be received as the source. • If the source, as specified in the ATCID, has		proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
not been identified in the reservation, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider from which the power is to be received as the source. • If the sink, as specified in the ATCID, has been identified in the reservation and it is discretely modeled in the Transmission Service Provider's Transmission model, use the discretely modeled point shall as the sink. • If the sink, as specified in the ATCID, has been identified in the reservation and the point can be mapped to an "equivalence" or "aggregate representation" in the Transmission Service Provider's Transmission model, use the modeled equivalence or aggregate as the sink. • If the sink, as specified in the ATCID, has been identified in the reservation and the point cannot be mapped to a discretely modeled point, an "equivalence," or an "aggregate representation" in the Transmission Service Provider's Transmission model, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider to which the power is to be delivered as the sink. • If the sink, as specified in the ATCID, has not been identified in the reservation, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider to which the power is being delivered as the sink.		

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 5: Each Transmission Operator shall establish TTC for each ATC Path as defined below: [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.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 5.1: At least once within the seven calendar days prior to the specified period for TTCs used in hourly and daily ATC calculations.	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.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 5.2: At least once per calendar month for TTCs used in monthly ATC calculations.	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.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 5.3: Within 24 hours of the unexpected outage of a 500 kV or higher transmission Facility or a transformer with a low-side voltage of 200 kV or higher for TTCs in effect during the anticipated duration of the outage, provided such outage is expected to last 24 hours or longer.	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.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 6: Each Transmission Operator shall establish TTC for each ATC Path using the following process: [Time Horizon: Operations Planning]	N/A	N/A

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 6.1: Determine the incremental Transfer Capability for each ATC Path by increasing generation and/or decreasing load within the source Balancing Authority area and decreasing generation and/or increasing load within the sink Balancing Authority area until either: • A System Operating Limit is reached on the Transmission Service Provider's system, or • A SOL is reached on any other adjacent system in the Transmission model that is not on the study path and the distribution factor is 5% or greater.	Incremental Transfer Capability is a concept inside of the Area Interchange Method, and the reaching of System Operating Limits and how the system is adjusted is required to be included per the standard. The remaining parts of this requirement just relate to details on how to perform the calculation which are well detailed in various places. NAESB should review this requirement but the ATCSDT does not believe additional work by NAESB is required.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the Area Interchange method to determine if this requirement should be addressed in the NAESB standards.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 6.2: If the limit in step R6.1 cannot be reached by adjusting any combination of load or generation, then set the incremental Transfer Capability by the results of the case where the maximum adjustments were applied.	Incremental Transfer Capability is a concept inside of the Area Interchange Method, and the reaching of System Operating Limits and how the system is adjusted is required to be included per the standard. The remaining parts of this requirement just relate to details on how to perform the calculation which are well detailed in various places. NAESB should review this requirement but the ATCSDT does not believe additional work by NAESB is required.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the Area Interchange method to determine if this requirement should be addressed in the NAESB standards.
MOD-028-1 Requirement 6.3: Use (as the TTC) the lesser of: • The sum of the incremental Transfer Capability and the impacts of Firm Transmission Services, as specified in the Transmission Service Provider's ATCID, that were included in the study model, or • The sum of Facility Ratings of all ties comprising the ATC Path.	NAESB should review and determine if guidelines are needed that limit TTC to the sum of ties. The new standard doesn't prevent "Sum of Facility Ratings" as a limit on the path, however it doesn't prescribe it either. "Sum of Facility Ratings" is a commercial concept and should be considered by NAESB.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. In reviewing the requirement, the subcommittee should consider the possibility that calculations may be higher than the flows that a physical tie line can accommodate. This could allow for intentional loop flows on other systems.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 6.4: For ATC Paths whose capacity uses jointly-owned or allocated Facilities, limit TTC for each Transmission Service Provider so the TTC does not exceed each Transmission Service Provider's contractual rights.	NAESB could set guidelines regarding TTC values being lower then contractual share, however that may already be covered by contractual obligations.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-028-1 Requirement 7: The Transmission Operator shall provide the Transmission Service Provider of that ATC Path with the most current value for TTC for that ATC Path no more than: [Time Horizon: Operations Planning]	NAESB should consider setting guidelines on the calculations of firm and non-firm ATC for an ATC Path for specified periods.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should consider if a standard is needed to address a gap between TOP calculation of TTC and the TSP use of the current TTC in ATC calculations. Refer to NERC Standards TOP-003-2 R3 and R4 and IRO-002 R12 for transmission operator requirements.
MOD-028-1 Requirement 7.1: One calendar day after its determination for TTCs used in hourly and daily ATC calculations.	NAESB should consider setting guidelines on the calculations of firm and non-firm ATC for an ATC Path for specified periods.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should consider if a standard is needed to address a gap between TOP calculation of TTC and the TSP use of the current TTC in ATC calculations. Refer to NERC Standards TOP-003-2 R3 and R4 and IRO-002 R12 for transmission operator requirements.
MOD-028-1 Requirement 7.2: Seven calendar days after its determination for TTCs used in monthly ATC calculations.	NAESB should consider setting guidelines on the calculations of firm and non-firm ATC for an ATC Path for specified periods.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should consider if a standard is needed to address a gap between TOP calculation of TTC and the TSP use of the current TTC in ATC calculations. Refer to NERC Standards TOP-003-2 R3 and R4 and IRO-002 R12 for transmission operator requirements.
MOD-028-1 Requirement 8: When calculating Existing Transmission Commitments (ETCs) for firm commitments (ETCF) for all time periods for an ATC Path the Transmission Service Provider shall use the following algorithm: [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ETC to determine if NAESB standards should address. The subcommittee should review ETC related requirements found in WEQ-001.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-028-1 Requirement 9: When calculating ETC for non-firm commitments (ETCNF) for all time periods for an ATC Path the Transmission Service Provider shall use the following algorithm: [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ETC to determine if NAESB standards should address. The subcommittee should review ETC related requirements found in WEQ-001.
MOD-028-1 Requirement 10: When calculating firm ATC for an ATC Path for a specified period, the Transmission Service Provider shall utilize the following algorithm: [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider setting guidelines on the calculations of firm and non-firm ATC for an ATC Path for specified periods.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ATC to determine if NAESB standards should address. The subcommittee should review ATC related requirements found in WEQ-001.
MOD-028-1 Requirement 11: When calculating non-firm ATC for a ATC Path for a specified period, the Transmission Service Provider shall use the following algorithm: [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider setting guidelines on the calculations of firm and non-firm ATC for an ATC Path for specified periods.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ATC to determine if NAESB standards should address. The subcommittee should review ATC related requirements found in WEQ-001.
MOD-029-1a Requirement 1: When calculating TTCs for ATC Paths, the Transmission Operator shall use a Transmission model which satisfies the following requirements: [Time Horizon: Operations Planning]	N/A	N/A
MOD-029-1a Requirement 1.1: The model utilizes data and assumptions consistent with the time period being studied and that meets the following criteria:	NAESB should consider these output levels for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 1.1.1: Includes at least:	N/A	N/A

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-029-1a Requirement 1.1.1.1: The Transmission Operator area. Equivalent representation of radial lines and facilities 161kV or below is allowed.	NAESB should consider this area for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 1.1.1.2: All Transmission Operator areas contiguous with its own Transmission Operator area. (Equivalent representation is allowed.)	NAESB should consider this area for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 1.1.1.3: Any other Transmission Operator area linked to the Transmission Operator's area by joint operating agreement. (Equivalent representation is allowed.)	NAESB should consider these joint operating agreements for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 1.1.2: Models all system Elements as in-service for the assumed initial conditions.	NAESB should consider these elements for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 1.1.3: Models all generation (may be either a single generator or multiple generators) that is greater than 20 MVA at the point of interconnection in the studied area.	NAESB should consider generation for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-029-1a Requirement 1.1.4: Models phase shifters in non-regulating mode, unless otherwise specified in the Available Transfer Capability Implementation Document (ATCID).	NAESB should consider phase shifters for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 1.1.8: Uses Special Protection System (SPS) models where currently existing or projected for implementation within the studied time horizon.	NAESB should consider this requirement, however the ATCSDT believes this is basic modeling information already described under R1.2 and R2.1 and that further specificity is not required.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 1.1.9: Models series compensation for each line at the expected operating level unless specified otherwise in the ATCID.	NAESB should consider this requirement, however the ATCSDT believes this is basic modeling information already described under R1.2 and R2.1 and that further specificity is not required.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 2: The Transmission Operator shall use the following process to determine TTC: [Time Horizon: Operations Planning]	N/A	N/A

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-029-1a Requirement 2.1: Except where otherwise specified within MOD-029-1, adjust base case generation and Load levels within the updated power flow model to determine the TTC (maximum flow or reliability limit) that can be simulated on the ATC Path while at the same time satisfying all planning criteria contingencies as follows:	N/A	N/A
MOD-029-1a Requirement 2.1.1: When modeling normal conditions, all Transmission Elements will be modeled at or below 100% of their continuous rating.	NAESB should consider this component when determining TTC while satisfying this planning criteria contingency.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 2.1.2: When modeling contingencies the system shall demonstrate transient, dynamic and voltage stability, with no Transmission Element modeled above its Emergency Rating.	NAESB should consider this component when determining TTC while satisfying this planning criteria contingency.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 2.1.3: Uncontrolled separation shall not occur.	NAESB should consider this component when determining TTC while satisfying this planning criteria contingency.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-029-1a Requirement 2.2: Where it is impossible to actually simulate a reliability-limited flow in a direction counter to prevailing flows (on an alternating current Transmission line), set the TTC for the non-prevailing direction equal to the TTC in the prevailing direction. If the TTC in the prevailing flow direction is dependent on a Special Protection System (SPS), set the TTC for the non-prevailing flow direction equal to the greater of the maximum flow that can be simulated in the non-prevailing flow direction or the maximum TTC that can be achieved in the prevailing flow direction without use of a SPS.	NAESB should consider this as a business practice to provide a result when a reliability constraint can't be reached. This level of information is appropriate in an instructional text but is not a reliability requirement.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 2.3: For an ATC Path whose capacity is limited by contract, set TTC on the ATC Path at the lesser of the maximum allowable contract capacity or the reliability limit as determined by R2.1.	NAESB should consider those ATC Paths who's capacity is limited by contract and how the setting of TTC is affected.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. In reviewing the requirement, the subcommittee should consider the possibility that calculations may be higher than the flows that physical tie lines can accommodate. This could allow for intentional loop flows on other systems.
MOD-029-1a Requirement 2.4: For an ATC Path whose TTC varies due to simultaneous interaction with one or more other paths, develop a nomogram describing the interaction of the paths and the resulting TTC under specified conditions.	NAESB should consider requiring TOPs to develop a nomogram describing the interaction of the paths who TTC varies due to simultaneous interactions with one or more other paths.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-029-1a Requirement 2.5: The Transmission Operator shall identify when the TTC for the ATC Path being studied has an adverse impact on the TTC value of any existing path. Do this by modeling the flow on the path being studied at its proposed new TTC level simultaneous with the flow on the existing path at its TTC level while at the same time honoring the reliability criteria outlined in R2.1. The Transmission Operator shall include the resolution of this adverse impact in its study report for the ATC Path.	NAESB should consider on stating how the TTC for an ATC Path has an adverse impact on the TTC value of any existing path.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 2.6: Where multiple ownership of Transmission rights exists on an ATC Path, allocate TTC of that ATC Path in accordance with the contractual agreement made by the multiple owners of that ATC Path.	NAESB should consider cases where there are multiple owners of transmission rights on an ATC Path and how that relates to the allocation of TTC and that contractual obligations are met.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 2.7: For ATC Paths whose path rating, adjusted for seasonal variance, was established, known and used in operation since January 1, 1994, and no action has been taken to have the path rated using a different method, set the TTC at that previously established amount.	This is allowed under R1, but not prescribed since there is no similar concept under MOD-028 or MOD-030. Therefore, NAESB may consider this setting of TTC for Rated System Path users.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-029-1a Requirement 2.8: Create a study report that describes the steps above that were undertaken (R2.1 – R2.7), including the contingencies and assumptions used, when determining the TTC and the results of the study. Where three phase fault damping is used to determine stability limits, that report shall also identify the percent used and include justification for use unless specified otherwise in the ATCID.	NAESB should consider this requirement as a business practice when determining TTC based on the various components above.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 3: Each Transmission Operator shall establish the TTC at the lesser of the value calculated in R2 or any System Operating Limit (SOL) for that ATC Path. [Time Horizon: Operations Planning]	R1.1 states that TTC must account for SOL, but doesn't require (or forbid) the use of a lower value. Therefore, NAESB may consider this prescriptiveness.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-029-1a Requirement 5: When calculating ETC for firm Existing Transmission Commitments (ETCF) for a specified period for an ATC Path, the Transmission Service Provider shall use the algorithm below: [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ETC to determine if NAESB standards should address. The subcommittee should review ETC related requirements found in WEQ-001,
MOD-029-1a Requirement 6: When calculating ETC for non-firm Existing Transmission Commitments (ETCNF) for all time horizons for an ATC Path the Transmission Service Provider shall use the following algorithm: [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ETC to determine if NAESB standards should address. The subcommittee should review ETC related requirements found in WEQ-001.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-029-1a Requirement 7: When calculating firm ATC for an ATC Path for a specified period, the Transmission Service Provider shall use the following algorithm: [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider setting guidelines on the calculations of firm and non-firm ATC for an ATC Path for specified periods.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ATC to determine if NAESB standards should address. The subcommittee should review ATC related requirements found in WEQ-001.
MOD-029-1a Requirement 8: When calculating non-firm ATC for an ATC Path for a specified period, the Transmission Service Provider shall use the following algorithm:[Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider setting guidelines on the calculations of firm and non-firm ATC for an ATC Path for specified periods.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ATC to determine if NAESB standards should address. The subcommittee should review ATC related requirements found in WEQ-001.
MOD-030-2 Requirement 1: The Transmission Service Provider shall include in its "Available Transfer Capability Implementation Document" (ATCID): [Time Horizon: Operations Planning]	N/A	N/A
MOD-030-2 Requirement 1.1: The criteria used by the Transmission Operator to identify sets of Transmission Facilities as Flowgates that are to be considered in Available Flowgate Capability (AFC) calculations.	NAESB should consider the criteria for the TOP to identify sets of Facilities as Flowgates.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 1.2: The following information on how source and sink for transmission service is accounted for in AFC calculations including:	NAESB should consider how source and sinks are accounted for.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 1.2.1: Define if the source used for AFC calculations is obtained from the source field or the Point of Receipt (POR) field of the transmission reservation.	NAESB should consider how source and sinks are accounted for.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 1.2.2: Define if the sink used for AFC calculations is obtained from the sink field or the Point of Delivery (POD) field of the transmission reservation.	NAESB should consider how source and sinks are accounted for.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 1.2.3: The source/sink or POR/POD identification and mapping to the model.	NAESB should consider how source and sinks are accounted for.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 1.2.4: If the Transmission Service Provider's AFC calculation process involves a grouping of generators, the ATCID must identify how these generators participate in the group.	NAESB should consider the grouping of generators.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 2: The Transmission Operator shall perform the following: [Time Horizon: Operations Planning]	N/A	N/A
MOD-030-2 Requirement 2.1: Include Flowgates used in the AFC process based, at a minimum, on the following criteria:	N/A	N/A

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 2.1.1: Results of a first Contingency transfer analysis for ATC Paths internal to a Transmission Operator's system up to the path capability such that at a minimum the first three limiting Elements and their worst associated Contingency combinations with an OTDF of at least 5% and within the Transmission Operator's system are included as Flowgates.	NAESB should consider these criteria in including Flowgates.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 2.1.1.1: Use first Contingency criteria consistent with those first Contingency criteria used in planning of operations for the applicable time periods, including use of Special Protection Systems.	NAESB should consider these criteria in including Flowgates.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 2.1.1.2: Only the most limiting element in a series configuration needs to be included as a Flowgate.	NAESB should consider these criteria in including Flowgates.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 2.1.1.3: If any limiting element is kept within its limit for its associated worst Contingency by operating within the limits of another Flowgate, then no new Flowgate needs to be established for such limiting elements or Contingencies.	NAESB should consider these criteria in including Flowgates.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 2.1.2: Results of a first Contingency transfer analysis from all adjacent Balancing Authority source and sink (as defined in the ATCID) combinations up to the path capability such that at a minimum the first three limiting Elements and their worst associated Contingency combinations with an Outage Transfer Distribution Factor (OTDF) of at least 5% and within the Transmission Operator's system are included as Flowgates unless the interface between such adjacent Balancing Authorities is accounted for using another ATC methodology.	NAESB should consider these criteria in including Flowgates.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 2.1.2.1: Use first Contingency criteria consistent with those first Contingency criteria used in planning of operations for the applicable time periods, including use of Special Protection Systems.	NAESB should consider these criteria in including Flowgates.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 2.1.2.2: Only the most limiting element in a series configuration needs to be included as a Flowgate.	NAESB should consider these criteria in including Flowgates.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 2.1.2.3: If any limiting element is kept within its limit for its associated worst Contingency by operating within the limits of another Flowgate, then no new Flowgate needs to be established for such limiting elements or Contingencies.	NAESB should consider these criteria in including Flowgates.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 2.2: At a minimum, establish a list of Flowgates by creating, modifying, or deleting Flowgate definitions at least once per calendar year.	N/A	This subcommittee should not consider this requirement during the standards development process. The task force believes this requirement is not necessary in the NAESB WEQ Business Practice Standards as it is already covered by proposed MOD-001-2 Requirements.
MOD-030-2 Requirement 2.3: At a minimum, establish a list of Flowgates by creating, modifying, or deleting Flowgates that have been requested as part of R2.1.4 within thirty calendar days from the request.	N/A	This subcommittee should not consider this requirement during the standards development process. The task force believes this requirement is not necessary in the NAESB WEQ Business Practice Standards as it is already covered by proposed MOD-001-2 Requirements
MOD-030-2 Requirement 2.5: At a minimum, establish the TFC once per calendar year.	N/A	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards
MOD-030-2 Requirement 2.5.1: If notified of a change in the Rating by the Transmission Owner that would affect the TFC of a flowgate used in the AFC process, the TFC should be updated within seven calendar days of the notification.	N/A	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards
MOD-030-2 Requirement 2.6: Provide the Transmission Service Provider with the TFCs within seven calendar days of their establishment.	N/A	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards
MOD-030-2 Requirement 3: The Transmission Operator shall make available to the Transmission Service Provider a Transmission model to determine Available Flowgate Capability (AFC) that meets the following criteria: [Time Horizon: Operations Planning]	N/A	N/A

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 3.1: Contains generation Facility Ratings, such as generation maximum and minimum output levels, specified by the Generator Owners of the Facilities within the model.	NAESB should consider these output levels for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 3.2: Updated at least once per day for AFC calculations for intra-day, next day, and days two through 30.	NAESB should consider these updates for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 3.3: Updated at least once per month for AFC calculations for months two through 13.	NAESB should consider these updates for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 3.4: Contains modeling data and system topology for the Facilities within its Reliability Coordinator's Area. Equivalent representation of radial lines and Facilities 161kV or below is allowed.	NAESB should consider this for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 3.5: Contains modeling data and system topology (or equivalent representation) for immediately adjacent and beyond Reliability Coordination Areas.	NAESB should consider this for the TOPs Transmission model.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 4: When calculating AFCs, the Transmission Service Provider shall represent the impact of Transmission Service as follows: [Time Horizon: Operations Planning] • If the source, as specified in the ATCID, has been identified in the reservation and it is discretely modeled in the Transmission Service Provider's Transmission model, use the discretely modeled point as the source. • If the source, as specified in the ATCID, has been identified in the reservation and the point can be mapped to an "equivalence" or "aggregate" representation in the Transmission Service Provider's Transmission model, use the modeled equivalence or aggregate as the source. • If the source, as specified in the ATCID, has been identified in the reservation and the point cannot be mapped to a discretely modeled point or an "equivalence" representation in the Transmission Service Provider's Transmission model, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider from which the power is to be received as the source. • If the source, as specified in the ATCID, has not been identified in the reservation use the immediately adjacent Balancing Authority associated with the Transmission Service Provider from which the power is to be received as the source.	N/A	The subcommittee should review the requirement for inclusion in the NAESB WEQ Business Practice Standards.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
• If the sink, as specified in the ATCID, has been identified in the reservation and it is discretely modeled in the Transmission Service Provider's Transmission model, use the discretely modeled point as the sink. • If the sink, as specified in the ATCID, has been identified in the reservation and the point can be mapped to an "equivalence" or "aggregate" representation in the Transmission Service Provider's Transmission model, use the modeled equivalence or aggregate as the sink. • If the sink, as specified in the ATCID, has been identified in the reservation and the point cannot be mapped to a discretely modeled point or an "equivalence" representation in the Transmission Service Provider's Transmission model, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider receiving the power as the sink. • If the sink, as specified in the ATCID, has not been identified in the reservation use the immediately adjacent Balancing Authority associated with the Transmission Service Provider receiving the power as the sink.		
MOD-030-2 Requirement 6: When calculating the impact of ETC for firm commitments (ETCFi) for all time periods for a Flowgate, the Transmission Service Provider shall sum the following: [Time Horizon: Operations Planning]	N/A	N/A

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 6.1: The impact of firm Network Integration Transmission Service, including the impacts of generation to load, in the model referenced in R5.2 for the Transmission Service Provider's area, based on:	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 6.1.1: Load forecast for the time period being calculated, including Native Load and Network Service load	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 6.1.2: Unit commitment and Dispatch Order, to include all designated network resources and other resources that are committed or have the legal obligation to run as specified in the Transmission Service Provider's ATCID.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ETC to determine if NAESB standards should address. The subcommittee should review ETC related requirements found in WEQ-001.
MOD-030-2 Requirement 6.2: The impact of any firm Network Integration Transmission Service, including the impacts of generation to load in the model referenced in R5.2 and has a distribution factor equal to or greater than the percentage used to curtail in the Interconnection-wide congestion management procedure used by the Transmission Service Provider, for all adjacent Transmission Service Providers and any other Transmission Service Providers with which coordination agreements have been executed based on:	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 6.2.1: Load forecast for the time period being calculated, including Native Load and Network Service load	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 6.2.2: Unit commitment and Dispatch Order, to include all designated network resources and other resources that are committed or have the legal obligation to run as specified in the Transmission Service Provider's ATCID.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 6.3: The impact of all confirmed firm Point-to-Point Transmission Service expected to be scheduled, including roll-over rights for Firm Transmission Service contracts, for the Transmission Service Provider’s area.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 6.4: The impact of any confirmed firm Point-to-Point Transmission Service expected to be scheduled, filtered to reduce or eliminate duplicate impacts from transactions using Transmission service from multiple Transmission Service Providers, including roll-over rights for Firm Transmission Service contracts having a distribution factor equal to or greater than the percentage used to curtail in the Interconnection-wide congestion management procedure used by the Transmission Service Provider, for all adjacent Transmission Service Providers and any other Transmission Service Providers with which coordination agreements have been executed.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 6.5: The impact of any Grandfathered firm obligations expected to be scheduled or expected to flow for the Transmission Service Provider's area.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ETC to determine if NAESB standards should address. The subcommittee should review ETC related requirements found in WEQ-001.
MOD-030-2 Requirement 6.6: The impact of any Grandfathered firm obligations expected to be scheduled or expected to flow that have a distribution factor equal to or greater than the percentage used to curtail in the Interconnection-wide congestion management procedure used by the Transmission Service Provider, for all adjacent Transmission Service Providers and any other Transmission Service Providers with which coordination agreements have been executed.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for ETC to determine if NAESB standards should address. The subcommittee should review ETC related requirements found in WEQ-001.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 6.7: The impact of other firm services determined by the Transmission Service Provider.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 7: When calculating the impact of ETC for non-firm commitments (ETCNFi) for all time periods for a Flowgate the Transmission Service Provider shall sum: [Time Horizon: Operations Planning]	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 7.1: The impact of all confirmed non-firm Point-to-Point Transmission Service expected to be scheduled for the Transmission Service Provider's area.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 7.2: The impact of any confirmed non-firm Point-to-Point Transmission Service expected to be scheduled, filtered to reduce or eliminate duplicate impacts from transactions using Transmission service from multiple Transmission Service Providers, that have a distribution factor equal to or greater than the percentage used to curtail in the Interconnection-wide congestion management procedure used by the Transmission Service Provider, for all adjacent Transmission Service Providers and any other Transmission Service Providers with which coordination agreements have been executed.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 7.3: The impact of any Grandfathered non-firm obligations expected to be scheduled or expected to flow for the Transmission Service Provider's area.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 7.4: The impact of any Grandfathered non-firm obligations expected to be scheduled or expected to flow that have a distribution factor equal to or greater than the percentage used to curtail in the Interconnection-wide congestion management procedure used by the Transmission Service Provider, for all adjacent Transmission Service Providers and any other Transmission Service Providers with which coordination agreements have been executed.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 7.5: The impact of non-firm Network Integration Transmission Service serving Load within the Transmission Service Provider's area (i.e., secondary service), to include load growth, and losses not otherwise included in Transmission Reliability Margin or Capacity Benefit Margin.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 7.6: Provider, filtered to reduce or eliminate duplicate impacts from transactions using Transmission service from multiple Transmission Service Providers, for all adjacent Transmission Service Providers and any other Transmission Service Providers with which coordination agreements have been executed.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 7.7: The impact of other non-firm services determined by the Transmission Service Provider.	NAESB should consider setting guidelines on what values go in ETC and require the disclosure of how certain types of contracts are handled.	The subcommittee should not consider this requirement during the standard development process. The TFC and TTC methodologies are pointed at the Transmission Operator and are already requirements in proposed MOD-001-2 Requirement 1. TFC and TTC are a limit to commercial activity over a flowgate or a path with respect to reliability limits.
MOD-030-2 Requirement 8: When calculating firm AFC for a Flowgate for a specified period, the Transmission Service Provider shall use the following algorithm (subject to allocation processes described in the ATCID): [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider adding a business practice for the TSP to use the algorithm in this requirement.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for AFC/ATC to determine if NAESB standards should address. The subcommittee should review AFC/ATC related requirements found in WEQ-001.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 9: When calculating non-firm AFC for a Flowgate for a specified period, the Transmission Service Provider shall use the following algorithm (subject to allocation processes described in the ATCID): [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider adding a business practice for the TSP to use the algorithm in this requirement.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for AFC/ATC to determine if NAESB standards should address. The subcommittee should review AFC/ATC related requirements found in WEQ-001.
MOD-030-2 Requirement 10: Each Transmission Service Provider shall recalculate AFC, utilizing the updated models described in R3.2, R3.3, and R5, at a minimum on the following frequency, unless none of the calculated values identified in the AFC equation have changed: [Time Horizon: Operations Planning]	NAESB should consider adding a business practice to provide the recalculating of AFC based on the frequencies below unless none of the calculated values have changed.	The subcommittee should not consider this requirement during the standards development process. These requirements touch upon the calculation portion of AFC. FERC has indicated that a customer can request calculation information from providers if there are questions. This requirement is overly prescriptive, would require significant documentation to show compliance, and would not provide any additional business value. Posting requirements can be audited because all postings on OASIS have time stamps.
MOD-030-2 Requirement 10.1: For hourly AFC, 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 AFC equation.	NAESB should consider adding a business practice to provide the recalculating of AFC based on the frequencies below unless none of the calculated values have changed.	The subcommittee should not consider this requirement during the standards development process. These requirements touch upon the calculation portion of AFC. FERC has indicated that a customer can request calculation information from providers if there are questions. This requirement is overly prescriptive, would require significant documentation to show compliance, and would not provide any additional business value. Posting requirements can be audited because all postings on OASIS have time stamps.
MOD-030-2 Requirement 10.2: For daily AFC, once per day.	NAESB should consider adding a business practice to provide the recalculating of AFC based on the frequencies below unless none of the calculated values have changed.	The subcommittee should not consider this requirement during the standards development process. These requirements touch upon the calculation portion of AFC. FERC has indicated that a customer can request calculation information from providers if there are questions. This requirement is overly prescriptive, would require significant documentation to show compliance, and would not provide any additional business value. Posting requirements can be audited because all postings on OASIS have time stamps.

NERC Requirement	NERC Drafting Team Recommendation for NAESB Action	NAESB WEQ EC MOD Scoping Task Force Determination
MOD-030-2 Requirement 10.3: For monthly AFC, once per week.	NAESB should consider adding a business practice to provide the recalculating of AFC based on the frequencies below unless none of the calculated values have changed.	The subcommittee should not consider this requirement during the standards development process. These requirements touch upon the calculation portion of AFC. FERC has indicated that a customer can request calculation information from providers if there are questions. This requirement is overly prescriptive, would require significant documentation to show compliance, and would not provide any additional business value. Posting requirements can be audited because all postings on OASIS have time stamps.
MOD-030-2 Requirement 11: When converting Flowgate AFCs to ATCs for ATC Paths, the Transmission Service Provider shall convert those values based on the following algorithm: [Time Horizon: Operations Planning] See Standard for Formula	NAESB should consider adding a business practice for the TSP to use the algorithm in this requirement for converting AFC values to ATC values for ATC paths.	The subcommittee should consider this requirement for inclusion in the NAESB WEQ Business Practice Standards. The subcommittee should review the requirement for AFC/ATC to determine if NAESB standards should address. The subcommittee should review AFC/ATC related requirements found in WEQ-001.

Appendix B: List of NAESB WEQ Executive Committee MOD Standard Scoping Task Force Participants
August 25, 2014

Participants Sorted by Company Name
(Includes WEQ Executive Committee Members and Alternates)

Buccigross, Jim	8760 Inc.
Phillips, Ray	Alabama Municipal Electric Authority
Pommen, Diana	Alberta Electric System Operator
True, Roy	Alliance for Cooperative Energy Services Power Marketing LLC
Norton, Chris	American Municipal Power, Inc.
Bean, Robert	Arizona Public Service Company
Molotch, Lori	Arizona Public Service Company
Tran, Stephen	BC Hydro
Anderson, Brenda	Bonneville Power Administration
Berdahl, Rebecca	Bonneville Power Administration
Hall, Lee	Bonneville Power Administration
Halpin, Francis	Bonneville Power Administration
Jones, Chris	Bonneville Power Administration
Mantifel, Russ	Bonneville Power Administration
Pompel, Marie	Bonneville Power Administration
Steigerwald, Mike	Bonneville Power Administration
Hansen, Brad	Bonneville Power Administration
Jacobsen, Brian	California ISO
Villarreal, Christopher	California Public Utilities Commission
Peress, N. Jonathan	Conservation Law Foundation
Philips, Marjorie Rosenbluth	Direct Energy
Oberski, Lou	Dominion Energy Marketing, Inc.
Hall, Edmund J.	Dominion Voltage, Inc.
Anthony, Mike	Duke Energy Corporation
Armstrong, Jack	Duke Energy Corporation
Graves, Paul	Duke Energy Corporation
Lowen, Mike	Duke Energy Corporation
Pritchard, Alan	Duke Energy Corporation
Bivens, Carrie	Electric Reliability Council of Texas, Inc.
Dumas, John	Electric Reliability Council of Texas, Inc.
Patterson, Mark	Electric Reliability Council of Texas, Inc.
Wattles, Paul	Electric Reliability Council of Texas, Inc.
Aymond, Clint	Entergy Services, Inc.
Saini, Narinder	Entergy Services, Inc.
Bak, Brian	Federal Energy Regulatory Commission Staff
Dobbins, Tony	Federal Energy Regulatory Commission Staff
Henry, Nick	Federal Energy Regulatory Commission Staff
Herbert, Michael	Federal Energy Regulatory Commission Staff
Masood, Abdur	Federal Energy Regulatory Commission Staff
Young, Chris	Federal Energy Regulatory Commission Staff
Kovacs, Ross	Georgia Transmission Corporation
McGovern, Patrick	Georgia Transmission Corporation
Willis, Troy	Georgia Transmission Corporation
Kee, Lila	GMO GlobalSign, Inc.
Coughlin, Robert	ISO New England, Inc.
Goldberg, Matt	ISO New England, Inc.
Mendrala, Cheryl	ISO New England, Inc.
Pearson, John	ISO New England, Inc.
Winkler, Eric	ISO New England, Inc.
Bilke, Terry	MISO
Francis, Dave	MISO
Knox, Marie	MISO
Nguyen, Tung	MISO
Skiba, Ed	MISO
Zhu, Kun	MISO
Booe, Jonathan	NAESB
Mallett, Elizabeth	NAESB
Trum, Caroline	NAESB
Campoli, Greg	New York Independent System Operator, Inc.
Cardone, Ernie	New York Independent System Operator, Inc.
Castle, Jim	New York Independent System Operator, Inc.
Gildea, Michael	North American Electric Reliability Corporation
Iwanechko, Kristin	North American Electric Reliability Corporation
Steward, Ryan	North American Electric Reliability Corporation
Lemire, John	North Carolina Electric Membership Corporation
Manning, James	North Carolina Electric Membership Corporation
Johnson, Alan	NRG Energy, Inc.
Franz, Marilyn	NV Energy

Appendix B: List of NAESB WEQ Executive Committee MOD Standard Scoping Task Force Participants
August 25, 2014

Participants Sorted by Company Name
(Includes WEQ Executive Committee Members and Alternates)

Hackney, Mark	Open Access Technology International, Inc.
Sorenson, Paul	Open Access Technology International, Inc.
Edmonds, Sarah	PacifiCorp
Hartung, Dean	PJM Interconnection, LLC
Jayachandran, Marilyn	PJM Interconnection, LLC
McLaughlin, Jeffrey	PJM Interconnection, LLC
Schmitt, Jeff	PJM Interconnection, LLC
Wesley, Kathy	PJM Interconnection, LLC
Wolfe, Art	PJM Interconnection, LLC
Ferreira, TJ	Power Costs, Inc.
Harshbarger, Bob	Puget Sound Energy, Inc.
Hurley, Jesse	Shift Systems, LLC
Ciza, John	Southern Company Services, Inc.
Dison, Joel	Southern Company Services, Inc.
Mathew, Sunish	Southern Company Services, Inc.
Mozena, Terry	Southern Company Services, Inc.
Sellers, Corey	Southern Company Services, Inc.
Wood, JT	Southern Company Services, Inc.
Davis, Jason	Southwest Power Pool
Monroe, Carl	Southwest Power Pool
Phillips, Joshua	Southwest Power Pool
Phillips, Tim	Southwest Power Pool
Womack, Jimmy	Southwest Power Pool
Yeung, Charles	Southwest Power Pool
Tritch, Andy	SunGard
Bohan, Michael	Tenaska, Inc.
Crockett, Valerie	Tennessee Valley Authority
Feagans, Chuck	Tennessee Valley Authority
Moates, Robin	Tennessee Valley Authority
Suarez, Tony	Tennessee Valley Authority
York, Kathy	Tennessee Valley Authority
Gallagher, William	Vermont Public Power Supply Authority
Ackerman, Jeff	Western Area Power Administration
Williams, Craig	Western Electricity Coordinating Council
Pera, Kevin	Xcel Energy, Inc.
Eaton, Terri	Xcel Energy, Inc.

Appendix B: WEQ Executive Committee MOD Standards Scoping Task Force Distribution List
August 25, 2014

Participants Sorted by Last Name
(Includes WEQ Executive Committee Members and Alternates)

Ackerman, Jeff	Western Area Power Administration
Anderson, Brenda	Bonneville Power Administration
Anthony, Mike	Duke Energy Corporation
Armstrong, Jack	Duke Energy Corporation
Aymond, Clint	Entergy Services, Inc.
Bak, Brian	Federal Energy Regulatory Commission Staff
Bean, Robert	Arizona Public Service Company
Berdahl, Rebecca	Bonneville Power Administration
Bilke, Terry	MISO
Bivens, Carrie	Electric Reliability Council of Texas, Inc.
Bohan, Michael	Tenaska, Inc.
Booe, Jonathan	NAESB
Buccigross, Jim	8760 Inc.
Campoli, Greg	New York Independent System Operator, Inc.
Cardone, Ernie	New York Independent System Operator, Inc.
Castle, Jim	New York Independent System Operator, Inc.
Ciza, John	Southern Company Services, Inc.
Coughlin, Robert	ISO New England, Inc.
Crockett, Valerie	Tennessee Valley Authority
Davis, Jason	Southwest Power Pool
Dison, Joel	Southern Company Services, Inc.
Dobbins, Tony	Federal Energy Regulatory Commission Staff
Dumas, John	Electric Reliability Council of Texas, Inc.
Eaton, Terri	Xcel Energy, Inc.
Edmonds, Sarah	PacifiCorp
Feagans, Chuck	Tennessee Valley Authority
Ferreira, TJ	Power Costs, Inc.
Francis, Dave	MISO
Franz, Marilyn	NV Energy
Gallagher, William	Vermont Public Power Supply Authority
Gildea, Michael	North American Electric Reliability Corporation
Goldberg, Matt	ISO New England, Inc.
Graves, Paul	Duke Energy Corporation
Hackney, Mark	Open Access Technology International, Inc.
Hall, Edmund J.	Dominion Voltage, Inc.
Hall, Lee	Bonneville Power Administration
Halpin, Francis	Bonneville Power Administration
Hansen, Brad	Bonneville Power Administration
Harshbarger, Bob	Puget Sound Energy, Inc.
Hartung, Dean	PJM Interconnection, LLC
Henry, Nick	Federal Energy Regulatory Commission Staff
Herbert, Michael	Federal Energy Regulatory Commission Staff
Hurley, Jesse	Shift Systems, LLC
Iwanechko, Kristin	North American Electric Reliability Corporation
Jacobsen, Brian	California ISO
Jayachandran, Marilyn	PJM Interconnection, LLC
Johnson, Alan	NRG Energy, Inc.
Jones, Chris	Bonneville Power Administration
Kee, Lila	GMO GlobalSign, Inc.
Knox, Marie	MISO
Kovacs, Ross	Georgia Transmission Corporation
Lemire, John	North Carolina Electric Membership Corporation
Lowen, Mike	Duke Energy Corporation
Mallett, Elizabeth	NAESB
Manning, James	North Carolina Electric Membership Corporation
Mantifel, Russ	Bonneville Power Administration
Masood, Abdur	Federal Energy Regulatory Commission Staff
Mathew, Sunish	Southern Company Services, Inc.
McGovern, Patrick	Georgia Transmission Corporation
McLaughlin, Jeffrey	PJM Interconnection, LLC
Mendrala, Cheryl	ISO New England, Inc.
Moates, Robin	Tennessee Valley Authority
Molotch, Lori	Arizona Public Service Company
Monroe, Carl	Southwest Power Pool
Mozena, Terry	Southern Company Services, Inc.
Nguyen, Tung	MISO
Norton, Chris	American Municipal Power, Inc.
Oberski, Lou	Dominion Energy Marketing, Inc.
Patterson, Mark	Electric Reliability Council of Texas, Inc.
Pearson, John	ISO New England, Inc.
Pera, Kevin	Xcel Energy, Inc.
Peress, N. Jonathan	Conservation Law Foundation
Philips, Marjorie Rosenbluth	Direct Energy
Phillips, Joshua	Southwest Power Pool

Appendix B: WEQ Executive Committee MOD Standards Scoping Task Force Distribution List
August 25, 2014

Participants Sorted by Last Name
(Includes WEQ Executive Committee Members and Alternates)

Phillips, Ray	Alabama Municipal Electric Authority
Phillips, Tim	Southwest Power Pool
Pommen, Diana	Alberta Electric System Operator
Pompel, Marie	Bonneville Power Administration
Pritchard, Alan	Duke Energy Corporation
Saini, Narinder	Entergy Services, Inc.
Schmitt, Jeff	PJM Interconnection, LLC
Sellers, Corey	Southern Company Services, Inc.
Skiba, Ed	MISO
Sorenson, Paul	Open Access Technology International, Inc.
Steigerwald, Mike	Bonneville Power Administration
Steward, Ryan	North American Electric Reliability Corporation
Suarez, Tony	Tennessee Valley Authority
Tran, Stephen	BC Hydro
Tritch, Andy	SunGard
True, Roy	Alliance for Cooperative Energy Services Power Marketing LLC
Trum, Caroline	NAESB
Villarreal, Christopher	California Public Utilities Commission
Wattles, Paul	Electric Reliability Council of Texas, Inc.
Wesley, Kathy	PJM Interconnection, LLC
Williams, Craig	Western Electricity Coordinating Council
Willis, Troy	Georgia Transmission Corporation
Winkler, Eric	ISO New England, Inc.
Wolfe, Art	PJM Interconnection, LLC
Womack, Jimmy	Southwest Power Pool
Wood, JT	Southern Company Services, Inc.
Yeung, Charles	Southwest Power Pool
York, Kathy	Tennessee Valley Authority
Young, Chris	Federal Energy Regulatory Commission Staff
Zhu, Kun	MISO

Appendix C: WEQ Executive Committee MOD Standard Scoping Task Force Meeting Notes, Comments, Work Papers and Voting Records Links
August 25, 2014

Appendix B – WEQ Executive Committee MOD Standard Scoping Task Force Meeting Notes, Comments, Work Papers and Voting Records Links			
Date of Meeting	Meeting Location	Meeting Notes	Number of Participants
April 10, 2014	WEQ Executive Committee MOD Standard Scoping Task Force Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf4/weq_ec_mod041014notes.doc	21
April 24, 2014	WEQ Executive Committee MOD Standard Scoping Task Force Work Paper and Comment Solicitation due May 22, 2014	Work Paper and Comment Solicitation due May 22, 2014: http://www.naesb.org/pdf4/weq_ec_mod042414reqcom.docx Comments Submitted by K. York, TVA: http://www.naesb.org/pdf4/weq_ec_mod042414_tva.xlsx Comments Submitted by E. Skiba, MISO - response to the requirements in the MOD A Spreadsheet: http://www.naesb.org/pdf4/weq_ec_mod042414_miso.xlsx Comments Submitted by E. Skiba, MISO - comments related to the outstanding directives NERC was to address under FERC Order 729: http://www.naesb.org/pdf4/weq_ec_mod042414_miso.doc Comments Submitted by J. Manning, NCEMC: http://www.naesb.org/pdf4/weq_ec_mod042414_ncemc.xlsx Comments Submitted by C. Wesley, PJM: http://www.naesb.org/pdf4/weq_ec_mod042414_pjm.xlsx Comments Submitted by JT Wood, Southern Company: http://www.naesb.org/pdf4/weq_ec_mod042414_southern.xlsx Comments Submitted by J. Phillips, SPP: http://www.naesb.org/pdf4/weq_ec_mod042414_spp.xlsx Late Comments Submitted by R. Berdahl, BPA: http://www.naesb.org/pdf4/weq_ec_mod042414_bpa_late.xlsx Late Comments Submitted by R. Berdahl, BPA - Evaluation of FERC ATC Directives: http://www.naesb.org/pdf4/weq_ec_mod042414_bpa_late.docx Late Comments Submitted by B. Harshbarger, Puget Sound Energy - on the consideration of MOD-028, MOD-029, and MOD-030 requirements in NAESB standards: http://www.naesb.org/pdf4/weq_ec_mod042414_puget_late.xlsx	

Appendix B – WEQ Executive Committee MOD Standard Scoping Task Force Meeting Notes, Comments, Work Papers and Voting Records Links			
Date of Meeting	Meeting Location	Meeting Notes	Number of Participants
June 5, 2014	WEQ Executive Committee MOD Standard Scoping Task Force Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf4/weq_ec_mod060514notes.doc Attachment to Notes: http://www.naesb.org/pdf4/weq_ec_mod060514a1.xlsx	24
June 10, 2014	WEQ Executive Committee MOD Standard Scoping Task Force Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf4/weq_ec_mod061014notes.doc Attachment to Notes: http://www.naesb.org/pdf4/weq_ec_mod061014a1.xlsx	18
July 2, 2014	WEQ Executive Committee MOD Standard Scoping Task Force Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf4/weq_ec_mod070214notes.doc Attachment to Notes: http://www.naesb.org/pdf4/weq_ec_mod070214a1.xlsx	24
July 11, 2014	WEQ Executive Committee MOD Standard Scoping Task Force Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf4/weq_ec_mod071114notes.doc Attachment to Notes: http://www.naesb.org/pdf4/weq_ec_mod071114a1.xlsx	23
July 25, 2014	WEQ Executive Committee MOD Standard Scoping Task Force Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf4/weq_ec_mod072514notes.doc Attachment to Notes: http://www.naesb.org/pdf4/weq_ec_mod072514a1.xlsx	18
August 1, 2014	WEQ Executive Committee MOD Standard Scoping Task Force Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf4/weq_ec_mod080114notes.doc Attachment to Notes: http://www.naesb.org/pdf4/weq_ec_mod080114a1.xlsx https://www.naesb.org//pdf4/weq_ec_mod080114a2.xlsx	17

Appendix C – Executive Committee Meeting Minutes and Availability of Transcripts		
Date	Link to Executive Committee Minutes	Availability of Transcripts[1]
February 18, 2014	NAESB Executive Committee Meetings, Phoenix, AZ WEQ EC Minutes (*Update on Coordination Activities with External Organizations*): http://www.naesb.org/pdf4/weq_ec021814fm.docx	Jill Vaughn, CSR - 281-853-6807
April 29, 2014	NAESB Executive Committee Meetings, Carmel, IN WEQ EC Minutes (*Update on MOD Standard Scoping Task Force*): http://www.naesb.org/pdf4/weq_ec042914dm.docx	Jill Vaughn, CSR - 281-853-6807
August 19, 2014	NAESB Executive Committee Meetings, Dallas, TX WEQ EC Minutes (*Update on MOD Standard Scoping Task Force*): https://www.naesb.org/pdf4/weq_ec081914dm.docx	Jill Vaughn, CSR - 281-853-6807

[1] The Federal Energy Regulatory Commission and other regulatory agencies may contact the NAESB office to obtain electronic copies of the transcripts. All others can contact the transcription service and order the transcripts for a nominal fee.

The NAESB Standards Development Process

NAESB is focused on proposing, considering, and adopting voluntary standards and model business practices that will have a significant and lasting impact on all aspects of the natural gas and electricity marketplaces. As a result of the standards NAESB adopts, it is expected that the industry will operate more efficiently and effectively, benefiting both the industry and its customers. At the same time, it must be acknowledged that NAESB standards may constitute a change in the way parties do business, with an accompanying effect on the use and allocation of resources.

NAESB's policy is to move at a deliberate pace, consistent with its annual plan(s), thus permitting those affected by its standards, especially those standards adopted as regulations by the Federal Energy Regulatory Commission (FERC) or other regulatory bodies, to assimilate them as part of their business practices. To this end, NAESB will carefully consider whether proposed standards are both timely and necessary. In particular, it will try to avoid adopting and implementing new standards, however beneficial, before the industry is able to reasonably make use of them.

The standards development process is governed by the annual plan, and items can be included in the plan or modified only with Board approval. The plan typically reflects requests from NAESB members, government agencies, and other interested parties. In approving the annual plan, the Board considers the availability of resources, including the NAESB budget and staff and the availability of industry volunteers. New requests received throughout the year are either considered part of the existing annual plan or as new items that require Board approval.

The standards development process begins with an annual plan item or a triaged and approved request. Triage is a process used by each quadrant of the Executive Committee (EC) to determine whether a request is within scope, which quadrant(s) it applies to, which subcommittee(s) it should be referred to, and what priority it should be assigned. Triage is carried out by EC members appointed by the EC chair. Triage recommendations are submitted to the en banc EC and require EC approval, and may also require Board approval if there are scope questions or if a modification of the annual plan is required.

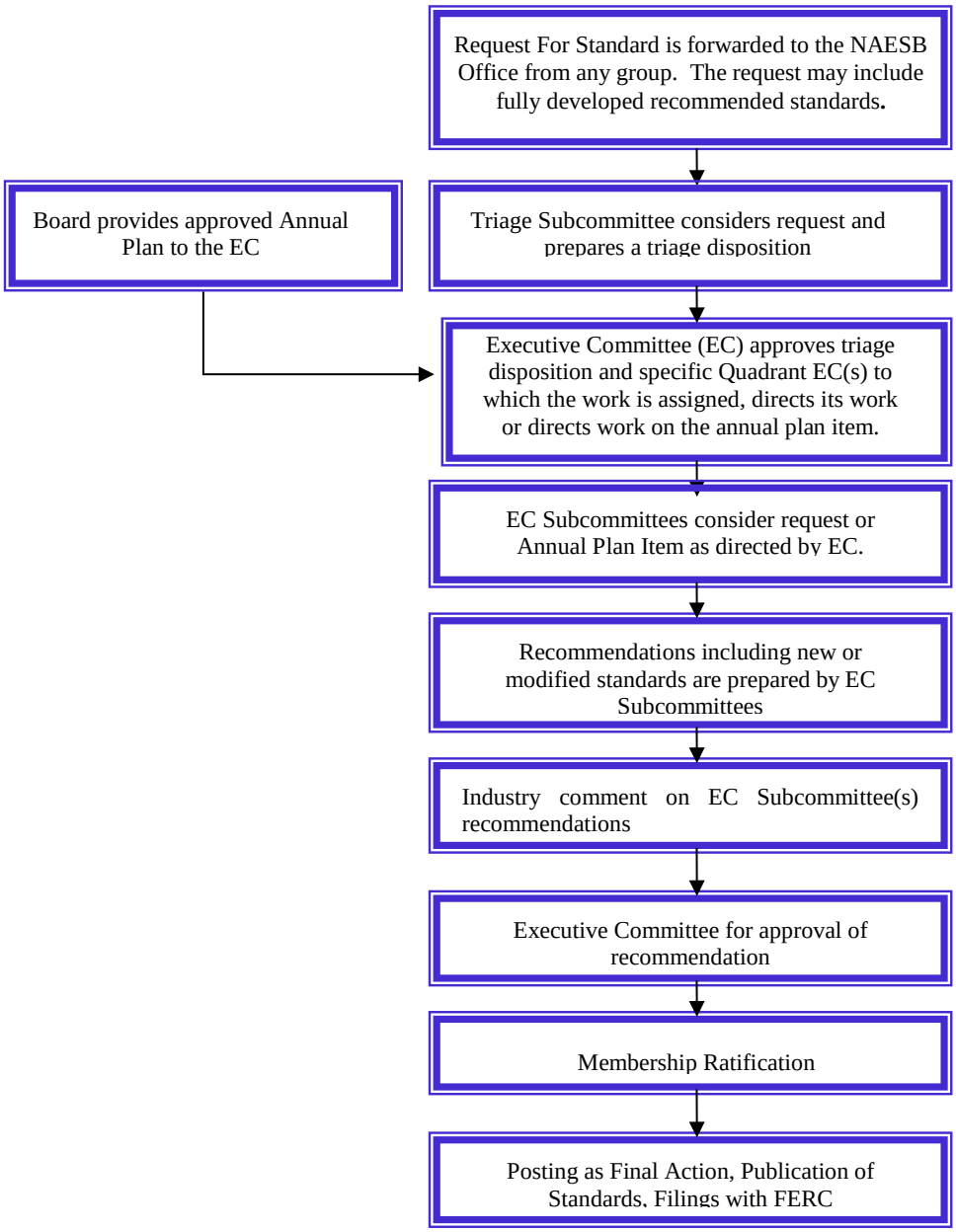
Once the triage process is completed, the subcommittees—more than one are normally involved in standards recommendations—review the request, compare it to existing standards, and prepare recommendations that may take the form of new or modified standards or interpretations. Participation in EC subcommittees is open to any interested party regardless of membership status. All subcommittee participants may vote; voting is balanced by segment and quadrant. All votes are public.

When the recommendation is complete, it is made available for a thirty-day industry comment period. The recommendation and comments are then forwarded to the EC, which considers the recommendation, makes any changes it deems necessary, and takes a vote. A recommendation must receive an affirmative vote of at least 67 percent from each applicable quadrant EC and 40 percent from each of the segments of the applicable quadrant(s).

After passage by the EC, the recommendation must be ratified by the NAESB members. An affirmative vote of 67 percent of the members of the applicable quadrant(s) is required for ratification. After ratification, standards and modifications are considered final actions and will be published in the next version of NAESB standards.

All NAESB quadrants follow the same development process described herein. The process has been followed by the WGQ since 1994 and has been used to develop more than five hundred standards that have been incorporated by reference into federal regulations.

North American Energy Standards Board
Standards Development Process Flow Chart



Flexibility

NAESB recognizes that flexibility is necessary as standards are developed to address regional concerns or to incorporate variances to accommodate operational or structural differences. Several WEQ standards incorporate regional or operational differences for both Version 0 and Version 1. There is a high threshold for incorporating such variances in a standard; the subcommittee(s) in drafting the standard, the EC in approving the subcommittee recommendation, and the membership in approving the standard must all agree that such variance is necessary. Nonetheless, NAESB procedures are well suited to take into account operational and regional differences.

Transparency

All NAESB meetings are open for attendance and participation by any interested party, with the exception of executive sessions of the Board or Managing Committee for purposes of discussing personnel, compensation or legal issues. Meeting announcements and agendas are posted in advance to permit the widest possible participation. Conference-calling capability is available for all meetings and web casting is available for most. Those intending to attend a meeting in person or by telephone are asked to notify NAESB by a specific date to permit adequate meeting planning.

Transcripts are made of all Board of Directors and EC meetings, and may also be made of other meetings that are expected to be controversial. Transcripts are maintained in the NAESB office and are provided to regulatory agencies for their internal use. All other interested parties can purchase transcripts from the relevant transcription service.

Coordination with NERC

For business practice standards development for the WEQ, if it is determined by NERC and NAESB Executive Management that joint development is needed by NERC and NAESB, the NERC-NAESB Coordination Joint Development Process is implemented.[1] This process requires that the appropriate NAESB Subcommittee and NERC Standards drafting team work together to develop reliability standards and business practices.

The Joint Interface Committee of NAESB, NERC and the ISO-RTO Council ("JIC") was dissolved as part of the agreement to create the Independent Grid Operator segment of the WEQ. The joint development process between NAESB and NERC is being used to ensure appropriate coordination. The ISOs and RTOs have strong decision-making roles in both NERC and NAESB, and thus with the use of the joint development process, the JIC was no longer necessary.

Accessibility of Standards and Work Products

The NAESB standards and protected work products are accessible to members at no cost as a benefit of their membership. Non-members can purchase the standards as a full version, or they can purchase individual final actions. Non-members can also access the standards at no cost by requesting an evaluation copy. NAESB standards and protected work products are copyrighted. Non-members can download a NAESB materials order form from the NAESB web site for ordering standards or for instructions on accessing standards for evaluation.

[1] The NERC-NAESB Coordination Joint Development Process was submitted to the Commission on February 17, 2006 in Attachment C of the Progress Report on NAESB Activities impacting Docket No. RM05-5-000, "Standards for Business Practices and Communication Protocols for Public Utilities": http://www.naesb.org/doc_view2.asp?doc=ferc021706.pdf.

NORTH AMERICAN ENERGY STANDARDS BOARD
2014 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT
Adopted by Board of Directors on April 3, 2014

	Item Description	Completion[i]	Assignment[ii]
1	**Develop business practices standards as needed to complement reliability standards** Develop business practice standards to support and complement NERC reliability standards, NERC policies and NERC standards authorization requests (SARs) using the NERC/NAESB Coordination Joint Standards Development Process as appropriate. Current NAESB activities underway to develop business practice standards that are supportive of this annual plan item are:		
a)	Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection – Permanent Solution[1] Note: Consideration should be given to provisional item 2.a. Work is being coordinated with the NERC IDC Working Group. Status: Started	3rd Q, 2014	BPS
b)	Perform consistency review of WEQ-008 Transmission Loading Relief Business Practice Standards and develop recommendation.[2] Status: Started	3rd Q, 2014	BPS
c)	Disturbance Control Standard (DCS) (BAL-002) Coordination with NERC Project 2010-14.1 Phase 1 of Balancing Authority Reliability-based Controls: Reserves Status: Monitor.	TBD	BPS/TIMTF
d)	Revise TLR level 5 to be treated similarly to TLR Level 3 in terms of treating the next hour allocation separately from that of current hour. (R11020) Status: Started	3rd Q, 2014	BPS
e)	Coordinate with NERC on changes to the definition of Bulk Electric System NERC Project 2010-17 Definition of Bulk Electric System (Phase 2). Status: Complete.	1st Q, 2014	SRS
f)	Develop complementary standards that align with NERC Project 2013-04 (formerly Project 2008-01 and now rolled into Project 2013-04) Voltage and Reactive Planning and Control. A SAR was finalized in April 2011. Status: Not Started	TBD	BPS
g)	Develop complementary standards that align with NERC Project 2010-4 Demand Data. The NERC project may impact WEQ-015 Business Practices for Measurement and Verification of Wholesale Electricity Demand Response. Status: Not Started	TBD	DSM/EE
h)	Coordinate with NERC on NERC Project 2012-05 ATC Revisions - Order 729. The NERC project may impact the WEQ-001 Open Access Same-Time Information Systems (OASIS) Standards, WEQ-002 OASIS Standards and Communication Protocol (S&CP), WEQ-003 Open Access Same-Time Information Systems (OASIS) Data Dictionary, and WEQ-013 OASIS Implementation Guide. Status: Not Started[3]	TBD	TBD

[1] See AP Item 3.iv, Completion dates may be revisited contingent upon NERC-NAESB coordination of implementation related to parallel flow visualization.

[2] In some sections of WEQ 008 it appears that the standards are applicable to all of the Interconnections and other it appears that the standards are only applicable to the Eastern Interconnection. The title indicates the standards are applicable to the Eastern Interconnection.

[3] The NERC standards request for this project can be found through the following hyperlink: http://www.naesb.org/pdf4/r14002.pdf

NORTH AMERICAN ENERGY STANDARDS BOARD
2014 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT
Adopted by Board of Directors on April 3, 2014

	Item Description	Completion[i]	Assignment[ii]
i)	Coordinate with NERC on NERC Project 2012-08 Glossary Updates. The NERC project may impact WEQ-000 Abbreviations, Acronyms, and Definition of Terms Status: Complete	1st Q, 2014	SRS
j)	Coordinate with NERC on NERC Project 2012-09 IRO Review. The NERC project may impact WEQ-008 Transmission Loading Relief – Eastern Interconnection Standards. Status: Not Started	TBD	BPS
k)	Develop, modify or delete business practices standards to support NERC activities related to NERC Time Error Correction (BAL-004-0) Status: Not Started	TBD	BPS
2	**Develop business practice standards in support of the FERC RM05-25-000 and RM05-17-000 (OATT Reform)[4]**		
a)	Develop version 3 business practice standards to better coordinate the use of the transmission system among neighboring transmission providers. Status: Underway Request R05004 was expanded to include the Order No. 890 (Docket Nos.RM05-17-000 and RM02-25-000), (Order No. 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002), and Order No. 890-B (Docket Nos. RM05-17-03 and RM05-25-03) "Preventing Undue Discrimination and Preference in Transmission Services"		
i)	Group 4: Pre-Emption; Request No. R05019		
	1. Pre-Emption Status: Started	2nd Q, 2014	OASIS
	2. Request No. R05019 Status: Started	2nd Q, 2014	OASIS
ii)	Group 6: Miscellaneous (Paragraph 1627[5] of FERC Order No. 890)		
	1) Paragraphs 1627 of Order 890 – Posting of additional information on OASIS regarding firm transmission curtailments Status: Not Started	TBD (follows the completion of AP 1(a))	OASIS

[4] FERC Order No. 890, issued February 16, 2007 can be accessed from the following link - http://www.naesb.org/doc_view4.asp?doc=ferc021607.doc.

[5] Paragraph 1627 of FERC Order No. 890, issued February 16, 2007: We agree with suggestions for the posting of additional curtailment information on OASIS and, therefore, require transmission providers, working through NAESB, to develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. Transmission providers need not implement this new OASIS functionality and any related business practices until NAESB develops appropriate standards. These postings must include all circumstances and events contributing to the need for a firm service curtailment, specific services and customers curtailed (including the transmission provider's own retail loads), and the duration of the curtailment. This information is in addition to the Commission's existing requirements: (1) when any transmission is curtailed or interrupted, the transmission provider must post notice of the curtailment or interruption on OASIS, and the transmission provider must state on OASIS the reason why the transaction could not be continued or completed; (2) information to support any such curtailment or interruption, including the operating status of facilities involved in the constraint or interruption, must be maintained for three years and made available upon request to the curtailed or interrupted customer, the Commission's Staff, and any other person who requests it; and, (3) any offer to adjust the operation of the transmission provider's system to restore a curtailed or interrupted transaction must be posted and made available to all curtailed and interrupted transmission customers at the same time.

NORTH AMERICAN ENERGY STANDARDS BOARD
2014 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT
Adopted by Board of Directors on April 3, 2014

	Item Description	Completion[i]	Assignment[ii]
	2) Redispatch Cost Posting to allow for posting of third party offers of planning redispatch services. Status: Not Started	TBD (follows the completion of AP 1(a))	OASIS
3	**Develop business practices standards to improve the current operation of the wholesale electric market and develop and maintain business practice and communication standards for OASIS and Electronic Scheduling**		
	a) Develop and/or maintain business practice standards as needed for OASIS and electronic scheduling. Specific items to address include:		
	i) Make remaining incremental enhancements to OASIS as an outgrowth of the NAESB March 29, 2005 conference on the future of OASIS (R05026). Scoping statement completed by SRS. There were a number of assignments from the Standards Request. The outstanding items are included below:		
	1) Eliminate Masking of TSR tag source and sink when requested status is denied, withdrawn refused, displaced, invalid, declined, annulled or retracted Status: Not Started	TBD	OASIS
	2) Initiate standard that eliminates the disparity of posting "sensitive" information. This standard should also include procedures of user certification that allows access to this class of information. Status: Underway (upon further development of this item by NAESB, a completion date will be determined)	TBD	OASIS
	3) Enhance the TSR result postings to allow showing of (i) limiting transmission elements and (ii) available generation dispatch options that would allow acceptance of reservation request. Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	TBD	OASIS
	ii) Review and correct WEQ-004 Coordinate Interchange Business Practice Standard as needed based on activities in NERC Project 2008-12, Coordinate Interchange Standards Revisions and supporting EOP-002-2 R4 and R6.[6] Status: Underway. Completion date dependent upon coordination activities with NERC, and Project 2008-12.	3rd Q, 2014	JESS
	b) Review e-Tag specifications and make modifications as needed for:		
	i) Supporting Network Integration Transmission Service standards Status: Complete	1st Q, 2014	JESS
	ii) Consistency and clarifications Status: Complete	1st Q, 2014	JESS
	iii) Regional Implementations supporting WECC efforts (probably of most impact to the appendices in the e-Tag specifications) Status: Complete	1st Q, 2014	JESS

[6] See AP Item 1.a.iv. Completion dates may be revisited contingent upon NERC-NAESB coordination of implementation related to parallel flow visualization.

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	Item Description	Completion[i]	Assignment[ii]
c)	Requirements for OASIS to use data in the Electric Industry Registry (R12001) Status: Not Started	TBD	OASIS
4.	**Develop and/or maintain standard communication protocols and - cybersecurity business practices as needed.**		
a)	Develop modifications for WEQ-012 as needed to reflect current market conditions		
i)	Review and develop standards as needed to support adequate session encryption (SSL/TLS issues: US-Cert Vulnerability Note VU#864643) Status: Complete	1st Q, 2014	Cybersecurity Subcommittee
ii)	Review annually at a minimum, the accreditation requirements for Authorized Certification Authorities to determine if any changes are needed to meet market conditions.[7] Status: Complete	4th Q, 2013	Cybersecurity Subcommittee
b)	Review WEQ standards for impact of XML vulnerability exploits and make modifications as needed to standards and functional specifications Status: Not Started	TBD	Cybersecurity Subcommittee/ JESS
5	**Maintain existing body of Version 3.x standards**		
a)	Consistent with ¶51 of FERC Order No. 890-A, add AFC and TFC values to the "System_Attribute" data element of the NAESB Standard WEQ-003: OASIS S&CP Data Dictionaries. (R08011) Status: Underway	TBD	OASIS
b)	Correct WEQ 013-2.6.7.2. – Resale off OASIS (R08027) Status: Not Started	TBD	OASIS
c)	Add language to WEQ-001-4 Online Negotiation and Confirmation process to clarify Table 4-3 (R09003) Status: Started	2nd Q, 2014	OASIS
d)	Create a new OASIS mechanism that allows for the merger of like reservations without the use of the resale mechanism (R09015) Status: Not Started	TBD	OASIS
e)	Improve transparency to allow customers to determine whether they have been treated in a non-discriminatory manner by posting of additional information on OASIS when service is denied (i.e. refused or declined) by customer(s) using new SAMTS process across multiple transmission systems to serve their NITS load on multiple systems. (R12006) Status: Not Started	TBD	OASIS
6.	**Develop or modify standards to Support FERC Order No. 676-E, (Docket No. RM 05-5-013)**		
a)	Develop standards to support the Transmission Provider right to reassess the availability of conditional firm (See ¶ 72[8]) Status: Not Started	TBD	OASIS

[7] The "NAESB Accreditation Requirements for Authorized Certification Authorities" can be found at: http://www.naesb.org/member_login_check.asp?doc=certification_specifications.docx.

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	Item Description	Completion[i]	Assignment[ii]
7.	**DSM-EE Certification Program**		
a)	Develop a specification for energy efficiency products and services to support a certification program. Status: Complete	4th Q, 2013	DSM-EE
b)	Develop a specification for demand response products and services to support a certification program. Status: Not Started	2014	DSM-EE
8.	**Gas/Electric Coordination**		
a)	As provided for the GEH Report approved by the Board of Directors on September 20, 2012, (http://www.naesb.org/pdf4/bd092012a1.pdf), which was initiated by the NPC Report[9], review and provide direction to develop standards or modify existing standards as needed for market timelines and coordination of scheduling.	3rd Q, 2014	Gas-Electric Harmonization Committee & Forum, WEQ EC, WGQ EC
b)	As provided for the GEH Report approved by the Board of Directors on September 20, 2012, (http://www.naesb.org/pdf4/bd092012a1.pdf), which was initiated by the NPC Report[10], review and provide direction to develop standards or modify existing standards as needed for flexibility in scheduling.	3rd Q, 2014	Gas-Electric Harmonization Committee & Forum, WEQ EC, WGQ EC
c)	As provided for the GEH Report approved by the Board of Directors on September 20, 2012, (http://www.naesb.org/pdf4/bd092012a1.pdf), which was initiated by the NPC Report[11], review and provide direction to develop standards or modify existing standards as needed for provision of information.	3rd Q, 2014	Gas-Electric Harmonization Committee & Forum, WEQ EC, WGQ EC

[8] 72. However, we reiterate here the Commission's finding in Order No. 890 that a transmission provider is permitted to extend its right to reassess the availability of conditional firm service. Since the Version 002.1 Standards do not specifically address this issue, we would ask the industry, working through NAESB, to continue to look at additional business practice standards facilitating a transmission provider's extension of its right to perform a reassessment

[9] Review and develop standards as needed and requested based on the National Petroleum Council (NPC) findings as communicated by the NAESB Board of Directors, government agencies or reliability organizations, as applicable. (9-15-11 NPC Report: http://www.npc.org/NARD-ExecSummVol.pdf)

[10] Id.

[11] Id.

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PROVISIONAL ITEMS

1. **Gas/Electric Coordination**

   a) Conduct assessment to determine if Electric Industry Requirements documented in WEQ-011 Gas / Electric Coordination should be considered reliability requirements and transition to NERC.

2. **Optional work to extend existing standards**

   a) Prepare recommendations for future path for TLR[12] (Phase 2) in concert with NERC, which may include alternative congestion management procedures[13]. Work on this activity is dependent on completing 2010 WEQ Annual Plan 1.a (Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection - Phase 1).

   b) Develop needed business practice standards for organization/company codes for NAESB standards – and address current issues on the use of DUNs numbers. Common code usage is linked to the transition of the Registry from NERC to NAESB.

   c) Develop business practices for allocating capacity among requests received during a submittal window Order 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 - Paragraph 805)[14].

3. **Pending Regulatory or Legislative Action**

   a) Determine NAESB action needed to support FERC Action Plan for Smart Grid Technology.

   b) Develop business practice standards for cap and trade programs for greenhouse gas.

   c) Develop standards as needed based on FERC Order No. 1000. (NAESB Analysis of FERC Order No. 1000)

   d) Develop standards as needed in support of Variable Energy Resources (VERs) final order (RM10-11-000). (NAESB Comments 3-2-11, FERC NOPR RM10-11-000, FERC Final Order No. 764, Docket No. RM10-11-000[15])

   e) Develop and/or modify existing standards as needed in response to FERC Final Order in Docket No. RM05-5-022 concerning rights to transmission service on an original path when the redirect is conditional.[16]

[12] Phase 2 of the Parallel Flow Visualization looks at developing options for and reporting of the most cost effective alternatives to achieve curtail obligations assigned during Phase 1."

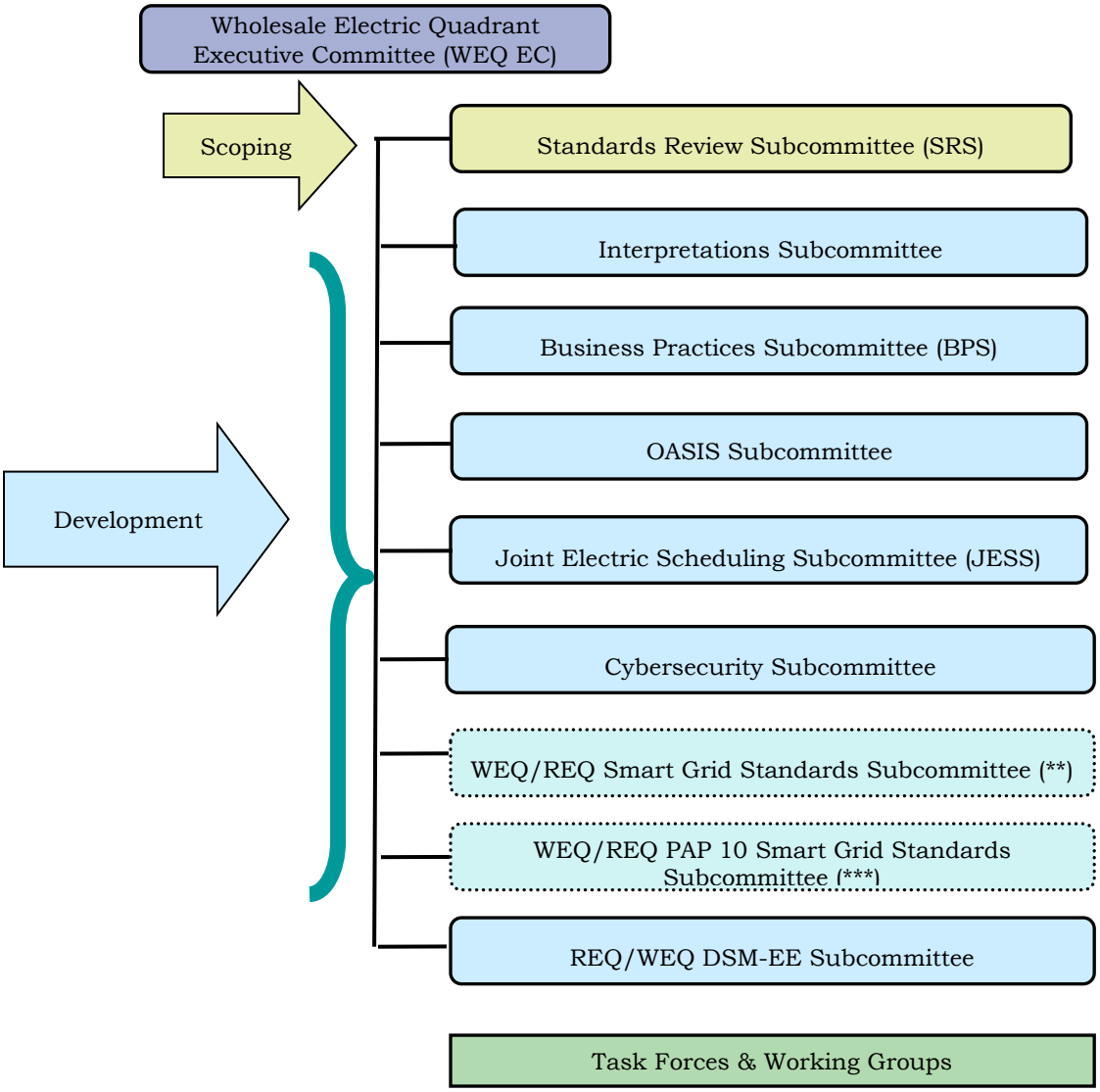
[13] For additional information, please see comments submitted by PJM and Midwest ISO for this Annual Plan Item: http://www.naesb.org/pdf3/weq_aplan102907w1.pdf.

[14] 805. The Commission recognizes that developing methods to allocate capacity among requests received during a submittal window may require detailed procedures, particularly when transmission requests received simultaneously exceed available capacity. As the Commission explained in Order No. 890, however, we believe that each transmission provider is in the best position to develop allocation procedures that are suitable for its system. This does not preclude transmission providers from working through NAESB to develop standardized practices, as suggested by Southern. For example, as we pointed out in Order No. 890, allocation methods such as that used by PJM to allocate monthly firm point-to-point transmission service could provide useful guidance in developing general allocation procedures.

[15] For FERC Final Order No. 764, Docket No. RM10-11-000, specifically paragraph nos. 146 and 182 should be reviewed:

> 146. The Commission concludes that an independent review of NERC standards and NAESB business practices is not necessary prior to the implementation of intra-hour scheduling. As noted by NERC, several entities currently offer intra-hour scheduling without any apparent conflict with Reliability Standards. NERC comments that it does not believe there are any existing standards that prohibit industry from implementing intra-hour scheduling, and no commenters have pointed to specific NAESB business practices that prevent industry from implementing intra-hour scheduling. The Commission therefore concludes that it is not necessary to delay adoption of the intra-hour scheduling requirements of this Final Rule pending further review of NERC Reliability Standards and NAESB business practices. To the extent industry believes it is beneficial to refine one or more existing NERC Reliability Standards or NAESB business practices to reflect intra-hour scheduling, stakeholders can use existing processes to pursue such refinements.
>
> 182. Some commenters request that the Commission standardize protocols for reporting meteorological or forced outage data required by this Final Rule. The Proposed Rule did not contain standard protocols for data reporting and, as a result, the merits of such a requirement have not been fully addressed in the record. Whether standardization of data communications would facilitate or hinder development of power production forecasting may implicate a variety of data and communications issues that would benefit from broad industry input through standards development processes such as those used by NAESB and other organizations.

WHOLESALE ELECTRIC QUADRANT EXECUTIVE COMMITTEE AND SUBCOMMITTEE STRUCTURE



[16] Specifically footnote 35:

[35] As we stated in Entergy Services, Inc., 143 FERC ¶ 61,143, at P 25 & n.68 (2013), our guiding precedent on the issue of when a customer requesting redirect loses rights on the original path was set in Dynegy Power Marketing, Inc., 99 FERC ¶ 61,054, at P 9 (2002), where we held that a transmission customer receiving firm transmission service does not lose its rights to its original path until the redirect request satisfies all of the following criteria: (1) it is accepted by the transmission provider; (2) it is confirmed by the transmission customer; and (3) it passes the conditional reservation deadline under OATT section 13.2.

NAESB WEQ EC and Active Subcommittee Leadership:

Executive Committee (EC): Kathy York (Chair) and Bob Harshbarger (Vice Chair)
Standards Review Subcommittee (SRS): Narinder Saini, Marie Knox
Interpretations Subcommittee: Ed Skiba
Business Practices Subcommittee (BPS) & Time and Inadvertent Management Task Force (TIMTF): Jason Davis, Narinder Saini
Open Access Same Time Information System (OASIS) Subcommittee: Paul Sorenson, J.T. Wood, Alan Pritchard
Joint Electric Scheduling Subcommittee (JESS): Bob Harshbarger (NAESB), Joshua Phillips (NERC)
Cybersecurity Subcommittee: Jim Buccigross
Demand Side Management-Energy Efficiency (DSM-EE) REQ/WEQ Subcommittee: Ruth Kiselewich (Retail), Roy True (WEQ), Paul Wattles (WEQ), and Eric Winkler (Retail)

Inactive Subcommittees:
e-Tariff Joint WEQ/WGQ Subcommittee (e-Tariff): Keith Sappenfield (WGQ)

(**) The Smart Grid Standards Subcommittee is a joint group of the retail electric and wholesale electric quadrants with other standards development groups such as OASIS (Organization for the Advancement of Structured Information Standards, not Open Access Same Time Information Systems related to NAESB standards and FERC actions), CalConnect, FIX and UCAIug, among others. Direction may be given from NIST, DoE or FERC and the group reports jointly to the NAESB Board Smart Grid Strategic Steering Committee and the WEQ and REQ ECs.

(***) The PAP 10 Smart Grid Standards Subcommittee is a joint group of the retail electric and wholesale electric quadrants with other standards development groups such as OASIS, UCAIug, OpenADE, ZigBee, ASHRAE, EIS Alliance, NARUC and includes other groups. Direction may be given from NIST, DoE or FERC and the group reports jointly to the NAESB Board Smart Grid Strategic Steering Committee and the WEQ and REQECs.

End Notes WEQ 2014 Annual Plan:

[i] Dates in the completion column are by end of the quarter for completion by the assigned committee, sub-committee or task force. The dates do not necessarily mean that the standards are fully staffed to be implementable by the industry, and/or ratified by membership. If one item is completed earlier than planned, another item can begin earlier and possibly complete earlier than planned. There are no begin dates on the plan.

[ii] The assignments are abbreviated. The abbreviations and sub-committee structure can be found at the end of the annual plan document.