

Please use this form to submit comments on the proposed set of ATC standards (MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030). Comments must be submitted by **December 14, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the abbreviation "ATC Standards" in the subject line. If you have questions please contact **Andy Rodriquez** at Andy.Rodriquez@nerc.net or by telephone at 609-947-3885.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
E-mail:	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 – Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 – Regional Reliability Organizations and Regional Entities

Comment Form — 3rd Draft of Standard MOD-001; 2nd Draft of Standards MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030 — Project 2006-07

Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest Reliability Organization (MRO)

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Terry Bilke	MISO	MRO	10
Robert Coish	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Jim Haigh	WAPA	MRO	10
Ken Goldsmith	ALTW	MRO	10
Pam Oreschnick	XCEL	MRO	10
Dave Rudolph	BEPC	MRO	10
Eric Ruskamp	LES	MRO	10
Michael Brytowski	MRO	MRO	10
Ron Slagel	MISO	MRO	10
Kun Zhu	MISO	MRO	10
27 Additional MRO members	not mentioned above	MRO	10

*If more than one region or segment applies, please indicate all that do apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

Project 2006-07 was initiated in 2006 to revise the then existing NERC reliability modeling standards to ensure the consistent and transparent calculation, verification, and use of Capacity Benefit Margin (CBM), Transmission Reliability Margin (TRM), Total Transfer Capability (TTC), Available Flowgate Capability (AFC), and Available Transfer Capability (ATC). Project 2006-07 requires specific reliability practices be incorporated into these standards. Such changes will enhance the reliable use of the bulk power transmission system without arbitrarily limiting commercial activity.

On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency and transparency in how CBM, TRM, TTC, AFC and ATC are calculated and allocated. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those modeling standards related to the determination of ATC.

The drafting team has created the following proposed standards:

MOD-001 – Available Transfer Capability. An “umbrella” standard requires the selection of a methodology, the updating of values, and the sharing of procedures and data.

MOD-004 – Capacity Benefit Margin. A standard that describes the requesting, calculation, and use of CBM.

MOD-008 – Transmission Reliability Margin. A standard that describes the calculation and use of TRM.

MOD-028 – Area Interchange Methodology (previously called the Network Response ATC Methodology). A standard that describes the calculation of TTC and ATC, as performed primarily in the Eastern Interconnection.

MOD-029 – Rated System Path Methodology. A standard that describes the calculation of TTC and ATC, as performed primarily in the Western Interconnection.

MOD-030 – Flowgate Methodology (previously called the Network Response Flowgate Methodology). A standard that describes the calculation of TFC and AFC, as well as the conversion of those values to TTC and ATC.

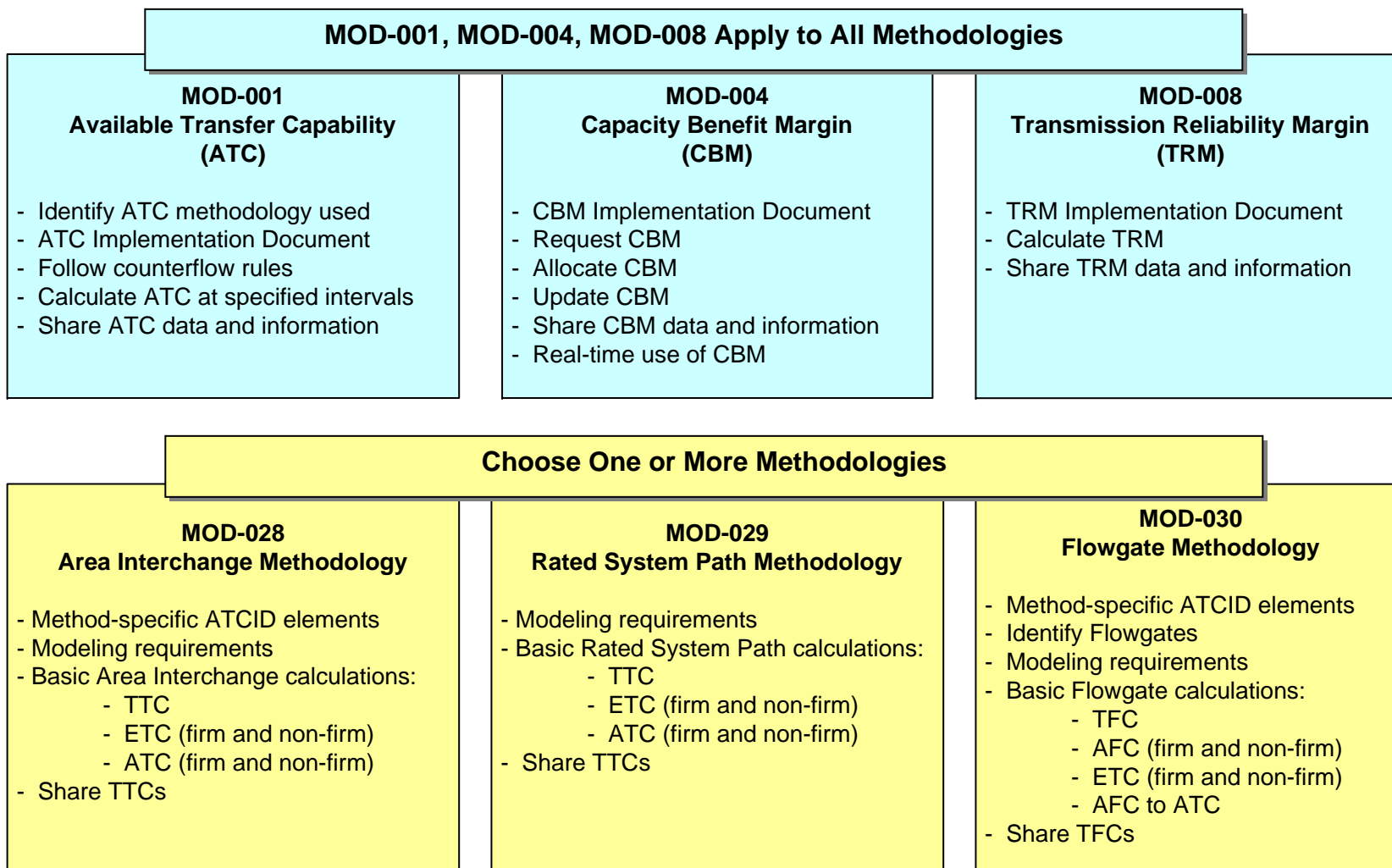
The diagram on the next page shows, at a very high level, the arrangement of requirements within the revised set of standards. The drafting team made many major changes to the standards based on feedback from stakeholders submitted in response to the last posting of these standards as well as feedback from NAESB and FERC. Major changes include:

- Defined several new terms – and changed the names of some of the methodologies. The most significant new term is, ‘Posted Path’ – this is used to define the boundaries for determining TTCs, TFCs, and ATCs.
- Changed the applicability so that the Transmission Operator determines TTC or TFC and the Transmission Service Provider determines ATC.
- Converted descriptive language into algorithms for calculating ETC and ATC.
- MOD-001 includes the basic requirement for the TSP to have an Available Transfer Capability Implementation Document (ATCID) – but if a particular method of calculating TTC or TFC requires that the TSP’s ATCID have additional data or information, then the requirement for the TSP’s ATCID to have that additional data or information is in the standard that includes the method for calculating TTC or TFC.

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- Removed all requirements to make data or information 'publicly available' – the drafting team has been working cooperatively with NAESB and all posting requirements will be addressed in NAESB Business Practices.
- Added measures and compliance elements.

Arrangement of Requirements within the Proposed Set of 'ATC' Standards



The implementation plan includes the proposed retirement of the following standards:

- **FAC-012 – Transfer Capability Methodology.** Now addressed in MOD-028, MOD-029, and MOD-030.
- **FAC-013 – Establish and Communicate Transfer Capabilities.** Now addressed in MOD-028, MOD-029, and MOD-030. Also to be addressed in future NAESB Business Practices.
- **MOD-002 – Review of TTC and ATC Calculations and Results.** Now addressed in MOD-028, MOD-029, and MOD-030. Also to be addressed in future NAESB Business Practices.
- **MOD-003 – Regional Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values.** To be addressed in future NAESB Business Practices.
- **MOD-005 – Procedure for Verifying Capacity Benefit Margin Values.** Now addressed in MOD-004.
- **MOD-006 – Procedures for the Use of Capacity Benefit Margin Values.** Now addressed in MOD-004
- **MOD-007 – Documentation of the Use of Capacity Benefit Margin.** Now addressed in MOD-004
- **MOD-009 – Procedure for Verifying Transmission Reliability Margin Values.** Now addressed in MOD-008

The standard drafting team was charged with revising the ATC-related modeling standards to comply with the FERC directives and industry participant consensus recommendations and is coordinating its efforts with NAESB to ensure that there are no gaps and no overlaps in the combined requirements. Please review the revised standards and the implementation plan and then answer the questions on the following pages. Please submit comments by **December 14, 2007.**

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team has proposed an Implementation Plan for these standards. Should additional time be provided for successful implementation?

Yes

No

If "Yes," please identify your concerns. Comments:

2. If there are any proposed definitions that you believe are incorrect, please identify the term and provide a substitute definition.

Incorrect Definition: a. The Posted Path definition in MOD-001-1 that indicates it includes any "Balancing Authority to Balancing Authority interconnection" and then R1 of the standard says ATC must "select one ATC methodology... for each Posted Path" and then R2 states that the TSP "shall calculate ATC values...using the ATC methodologies." As a result, the TSP must calculate ATCs and post those ATCs and all the Posted Paths. Many of these BA to BA paths are not useful paths to post either for commercial or reliability reasons. Therefore the language in the definition or the requirements should clarify that the definition provides the items such as any BA to BA path, path on which there has been curtailment, etc. that may qualify for posting or else the requirements should be changed to indicate that postings are not developed for all such paths but are developed for those paths that such postings are required for commercial and/or reliability reasons.

b. Presuming that changes are made per our comment 2.a. so that the Posted Path definition is only including items that are eligible for Posted Path and does not include items that must be posted, we note that the Posted Path definition in MOD-001-1 does not cover all the instances of a posted path in that there are flowgates that should be set up for reliability purposes to cover a system constraint that is not properly represented in the transmission service request evaluation process and is not covered by the three items listed. Service may not have been denied, curtailed, or interrupted yet due to the constraint because the facilities were not included in a flow gate. The MRO recommends that the following be included as an item in the definition "4) Any flowgate."

Posted Path Definition: The MRO asks the SDT to consider adding some language onto the end of Item (2) to qualify the statement. Something like "...and for which congestion is expected to occur." This is needed because it could have been an unusual operating condition (multiple generator/line outages) that caused the curtailment and that condition is not expected to occur again.

3. If there is a requirement in any of the proposed standards that you believe is technically incorrect, please identify the standard and requirement and identify what is incorrect. If possible, provide alternate language that you believe would make the requirement technically correct.

Incorrect Requirement:

MOD-001, R1, should read "...Transmission Operator or Transmission Service Provider..." After hearing some industry comment that including this "or" (as we have in multiple comments) may not be possible in a standards requirement, we look to the team to determine how best to include some flexibility in which entity is required to meet the standard, to respect the varying distribution of work across these regions.

MOD-001-1 R1: The requirement to select one method for each path needs to be clarified. Some MRO members use the rated system path method for CA-CA hard-tie calculations and then use the flowgate method facilities expected to be congested. The requirement to translate AFC to ATC for each path could result in a conflict if the CA-CA path limit is based upon the rated path method when a flowgate limits the path rating when AFCs are converted to ATCs. The MRO recommends that the SDT clarify the requirement as necessary to explain how this conflict will be resolved.

MOD-001-1 R.3.3 should read "The identity or a link to the identity of the Planning Coordinator and Transmission Operator...associated with each Flowgate...". Reasoning: Common practice is to include flowgates rather than all facilities. Also, the list of Flowgates may get updated often (monthly). We suggest including a link to the Flowgates. Having this link will reduce the burden of having to update the ATCID on a monthly basis.

MOD-001-1 R3.6: The MRO does not understand what "allocation" is. The MRO asks that the SDT clarify this word in the standard.

MOD-001-1, R6, the method of notification should include an option for public posting such as OASIS.

MOD-001-1, R10. 14 days can be too short when there are multiple requests pending. There should be a queue process. It is reasonable to request a response time for the first request in the queue, but not on all simultaneous requests.

MOD-001-1 R10: The extent of data to be provided upon request is potentially too extensive to be workable or justified.

MOD-001-1 R10: The requirement should be to only provide your own data. Otherwise there can be issues of confidentiality with providing third party data.

MOD-001-1 R10: There should be a restriction that it is only required to provide data used in AFC calculations. This may be implied but it should be made clear.

MOD-001-1 R10.1: The need to provide transmission "additions and retirements" should be restricted to only those used in AFC calculations. The open planning process is the correct venue to request info on planned facilities, not the ATC standards.

MOD-001-1 R10.4" "details" needs to be expanded upon. The MRO does not understand what this means.

MOD-001-1, R10.12. Since there is a requirement to provide this information in 14 days, this needs to be clarified to say that information that must be provided is the rules for calculating counterflow used in the calculation of ATCs, not the actual MW values because the MW would be too much data to provide in 14 days.

MOD-004-1 does not seem to provide for those Transmission Service Providers who have a practice of maintaining zero CBM due to reserve sharing arrangements in which little outside assistance has been assumed in developing their historical generation reserve requirements. The MRO recommends that a requirement be added to MOD-004-1 outlining what descriptions must be provided in the CBMID to describe zero CBM practices such as under R3.1. For the SDT's information, MAPP historically has self provided its reserve requirements without outside assistance and therefore has historically set CBM to zero.

MOD-004, R3 and R4, A monthly value is extremely difficult to administrate and implement in the ATC calculation. Such a requirement will subject the TSP to significant increases in cost (the vendor has to provide new code and the frequency of TSP updates would drastically increase). GCIR calculation part has to do a lot more studies. Midwest ISO suggests leaving it to each region to decide on the time intervals.

MOD-004, R3.1 – This section should be updated to clarify what is meant to be requested. For example, it states “requested for each month for each year for the next ten year period.” Do you really want 120 months worth of requests, or 12 monthly requests and 9 yearly? Suggested wording “for each month for the first 12 months and for each year for the remainder of the ten year period”

MOD-004, R3.2 – Why should LSE update every month if CBM is only calculated once per year? We suggest that these timelines be clarified.

MOD-004-1 R4.2 should be reworded as: “...simultaneously, or a methodology to meet Resource Adequacy criteria that assumes an aggregated need for CBM, or all firm ATC or AFC has been allocated...” Reasoning: Assuming each LSE (or group of LSE) submits its GCIR based on 1day/10year criteria, preserving the “sum” of all such requests is equal to planning according to such 1day/10year emergency happens in all LSEs (or groups of LSE) at the same time. In a large capacity sharing pool such as MISO, this is to plan way beyond 1day/10year criteria. We recognize the right of LSE having special requirement based on state requirement. However, the original lingual doesn't allow MISO to continue its current methodology (“max” instead of “sum”) even though all LSEs agree to do so.

MOD-004-1 R4.1.2.2 should read “As a minimum standard, classify ... greater than 3% on an OTDF Flowgate or 5% on a PTDF Flowgate as a significant impact”.

MOD-004-1 R4.2.2. - since AFC is determined from CBM, CBM for each Flowgate should not be dependent on AFC. CBM can be big enough to drive AFC to zero or negative. This simply means that resource adequacy criteria can't be met, and no capacity will be available on that Flowgate (which is what the original wording of this requirement was trying to do anyway). Therefore we believe CBM should not be set to AFC, it should be left at whatever value was calculated. Suggestion language: For Flowgates, Entities may use a static number, which requires its CBMID describe the procedure of utilizing CBM, or set the CBM for each Flowgate equal to the lesser of:

MOD-004-1 R4.3 and R5.3 - , see the comment for R4.2.2. The same argument applies to these requirements.

MOD-004-1 R5.2 - see the comment for R4.2. The same rewording is recommended.

MOD-008-1 R1.1 indicates that one uncertainty that can be considered is "Aggregate Load forecast uncertainty (not included in determining generation reliability requirements)." The MRO understands that a concern is making sure that items are not double covered by CBM and TRM, however, this sub requirement is incorrect and needs to be modified because the same load forecast uncertainty will result in uncertainty in generation planning that may require a CBM amount--in other words we have to allow for additional transmission capacity to deliver generation reserves in an emergency when loads are higher. But that same load forecast uncertainty will result in uncertainty in the loadings on transmission facilities and will impact the need for having a margin to cover for loads on the system at all times. The MRO recommends that the SDT either delete the words "(not included in determining generation reliability requirements)" from the item or else revise the words to say something like the following which better describes what should be excluded, that is "(TRM is not to include impacts of load forecast uncertainty on CBM.)"

MOD-008-1 R1.2: The need to state that consistent assumptions are used for TRM as is used in the planning process needs to be clarified. The SDT should clarify that short-term TRM should be consistent with operational planning while long-term TRM should be consistent with long-term planning. The MRO recommends that the language here be modified to be similar to R8 of MOD-001-1 to say, "A statement to confirm that it shall use assumptions in calculating TRM that are consistent with those assumptions that are used in ANY ASSOCIATED OPERATIONS STUDIES OR PLANNING STUDIES FOR THE TIME PERIOD STUDIED." The words in caps are the new words that are added in place of the words in the draft standard for that part of R1.2.

MOD-008, R1.5: "If TRM is zero for any of the time periods listed.....".

MOD-008-1 R3. and R4 call for certain responsible entities to provide information in seven days. This is not enough time to allow for delays due to vacations and other absences. In smaller utilities, especially this seven days is not realistic. The MRO asks that the SDT increase this time and suggests 30 days as a more reasonable number.

MOD-030-1, change R1 language to affect M1 regarding criteria used by Transmission OwnerR1, TSP should not be responsible for actively notifying changes made to criteria set by TO. Suggested wording is "... shall include ... (ATCID) the practice or a link to the practice the TSP uses for adding Flowgates".

MOD-030-1 R2.1 has a typo, the word "for" should be deleted from the requirement.

MOD-030-1 R2.1.2 is too limiting in requiring that "at a minimum the first three limiting Elements/Contingency combinations within the Transmission Operator's system are included as Flowgates." The MRO believes there are smaller Transmission Operators with surrounding larger utilities with higher loaded facilities where this requirement would unnecessarily result in the establishment of additional flowgates. The MRO is not sure an across-NERC requirement for flowgate criteria is required; however, if the SDT gets comments to the contrary, the MRO suggests that the Transmission Provider be required to have documentation which includes an explanation for not using any of the three limitations. In this way, there is not a lot of needless work yet there is a provision which will result in protecting reliability. If TPs develop the documentation, if there are reliability issues, it will be obvious and the TPs will act to create the new flowgates.

MOD-030-1, R2 should read "...Transmission Operator or Transmission Service Provider..." After hearing some industry comment that including this "or" (as we have in multiple comments) may not be possible in a standards requirement, we look to the team to determine how best to include some flexibility in which entity is required to meet the standard, to respect the varying distribution of work across these regions.

MOD-030-1, requirement R.2.1.1. is redundant with the definition of Flowgate given in the "definitions" section. This requirement should be removed, or at least reworded to read "...may be a Flowgate."

MOD-030-1, R2.1.2, the phrase "first three limiting" is too prescriptive and should be removed. For example, if the most limiting first contingency transfer is a large value, say 10,000, adding first three limiting elements/contingency combinations is not necessary. If the requirement can't be deleted, we suggest adding wording that sets a transfer level such that the first three constraints that cause the FCITC to fall under that level will be captured. Also, "source sink combinations" needs to be further defined as a calculation entity of any size could have thousands of these possible combinations. Also, if this in-depth study is required, the frequency in R2.2 should be decreased (as this is a minimum standard).

MOD-030-1 R2.1.3: Before the first "OR" the MRO recommends that a qualifier like "experiencing at least 24 instances of congestion" and "expected to be a congested facility in the planning horizon" to limit the instances in which parties have to post a flowgate. If a facility has TLR because of some weird system condition not expected to occur again, it would be waste of time to post a flowgate for that.

MOD-030-1 R2.2 requires that the list of Flowgates be updated on a quarterly basis. Yet R2.4 requires that TFC only be updated on an annual basis. The MRO recommends that R2.2 be changes to updating on an annual basis. The quarterly basis is needless extra work.

MOD-030-1, R2.3 rating issues, refer to comments from SRC, which says "MOD-030-1, R2.3 does not identify that TFC can be limited by an IROL but it should. If selling transmission service really requires development of a reliability standard, R2.4 should be modified to require updating the TFC any time the underlying determinants, such as facility ratings, change."

MOD-030-1 R2.3: The MRO is aware of some processes that require that regional groups to approve new flowgate TTCs prior to posting so as to have a regional reliability and equity review prior to posting the new flowgate TTCs. If a flowgate line rating increases, there can be a time-lag until the regional groups approve the new operating study and operating guide required before the new TTC can be posted. Some words are needed to allow for the time lag for regional review since it benefits reliability and equity.

MOD-030-1 R3 should read "The Transmission Service Provider shall use a Transmission model to determine..." And then an additional criteria bullet could be added that states "Contains data provided by the Transmission Operator, to the extent that it is available."

MOD-030-1 R.3.5, arbitrarily requiring modeling data and topology for at least three contiguous busses is too prescriptive. This requirement could be rewritten to as "Contains modeling data and topology agreed upon by each adjacent Reliability Coordinator Area and the Transmission Operator or the Transmission Service Provider."

However it is worded, somehow the requirement has to be set based on the intention of improving loop flows, not getting to a certain number of busses.

MOD-030-1 R4 needs to be rewritten. First, we believe NERC standard shouldn't intervene with how TSP treats PTP reservations. TSP has the best knowledge of their system and knows what treatment gives the best AFC forecast. Second, if this treatment has to be discussed anyway, we believe that having some flexibility is better than requiring the use of source/sink. For example, one transaction going across multiple OASIS will have the same source/sink along the path. Using source/sink could result in double-counting, triple counting, etc. Another example is that, in large TSP area such as MISO, OASIS POR/POD or Source/Sink can't represent real-time market central dispatch. Reservations/schedules only determine overall MISO interchange, not interchange for MISO internal BAs. In other cases, some other method may be more desirable. If getting the most accurate calculation (while not hindering transparency) is the intent of the team, then the way in which the reservation is modeled should not solely depend on the information in the request, but rather on a methodology that can be reviewed by everyone. Suggested language? (maybe in the same line as "a methodology that can be reviewed by everyone"

MOD-030-1 R5.1 indicates that the TSP is to include all expected outages, additions, and retirements in effect in the TSP's area, adjacent TSPs, and any TSPs with coordination agreements have been executed. The MRO believes this is a nice goal but the TSP cannot be liable for a penalty for failing to include all expected outages, additions, and retirements that it hasn't been told about. The MRO recommends that "and known" be added to the requirement.

MOD-030-1, R5.1. This is not always the best practice. For example, while using PSS/E model, some outage remote to the TSP service area can cause the case to not solve and the TSP has to either use DC power flow solution or ignore the outage. The impact from ignoring a remote outage on the accuracy of AFC is much smaller than that from using DC power flow. The TSP has to temporarily block the outage to achieve overall better accuracy. Suggestion wording is "... have been executed, to the extent it helps improve the AFC calculation accuracy." Understanding that the ability to measure deviations may become an issue, the wording could be adjusted to state "... have been executed, except for any outages that, if included, would force the calculation into a less accurate solution technique." We realize that the suggested wording is not perfect, but we're hoping that the team understands our intention and can adjust it accordingly.

MOD-030-1 R5.1: The word "all" should be deleted. Only the one included in the calculation should be required. Also, same comment on the "additions and retirements" language. The need to provide transmission "additions and retirements" should be restricted to only those used in AFC calculations. The open planning process is the correct venue to request info on planned facilities, not the ATC standards.

MOD-030-1, R5.2. should add "to the extent they are available" to the end. Not all MISO third parties have that data available.

MOD-030-1 R6.1.3.1.1: Peak load forecast for the first 31 days needs to be clarified. The MRO is aware of some that prepare a peak load forecast only for the next 7-10 days. In such cases the load used in projections for days 11-31 is the monthly value. The accuracy of daily forecasts beyond the next 7-10 is questionable. Maybe the language should specifically allow this.

MOD-030-1 R6.2: "impact" needs to be defined a bit more. Some MRO members define impact as something like 85% of positive impacts, 100% if the flowgate has had firm TLR. Also, "expected to be scheduled" should be clarified because some Transmission Providers include all reservation impacts in AFCs. The "expected" language adds a complexity that will be hard to meet and for that reason the language should be deleted.

MOD-030-1 R6.3 and R6.4 provide a 3% but do not define what it is 3% of. The MRO recommends that the SDT add language to explain how it is calculated --what is the calculated in terms of percent of what. This also applies to R7.2 and R7.4 of the same standard.

MOD-030-1 R7.1: Again "impact" needs some more definition. Some presently use something like 50% counterflow in non-firm AFCs. Also, the language states that non-firm AFCs should only bring in non-firm reservations. The MRO believe this is wrong. Firm reservations NEED to be considered in non-firm AFCs.

MOD-030-1 R8 refers to postbacks but no definition is provided. The SDT should either provide a NERC definition, repeat the NAESB definition, or paraphrase a definition. Without it, the MRO and other responsible entities are not sure what is the requirement.

MOD-030-1, R8 and R9, "ATC" should be "AFC".

MOD-030-1 R10 is not understandable. The MRO has no idea what is meant by this Requirement and how to implement the requirement. The SDT should substantially increase the words that explain this requirement.

MOD-030-1 R10., the text describing "P" should read: "...as a minimum standard, a Flowgate is considered 'impacted' by a path if the Distribution Factor for that path is greater than 3% on an OTDF Flowgate or 5% on a PTDF Flowgate".

MOD-030-1 R10: In addition to the comments already supplied, explicit consideration of the concern raised above regarding those cases where a party uses CA-CA path limits to set hard tie limits and yet also posts flowgate limits where AFCs need to be converted to ATCs. The requirement to translate AFC to ATC for each path could result in a conflict if the CA-CA path limit is based upon the rated path method when a flowgate limits the path rating when AFCs are converted to ATCs. The MRO recommends that the SDT clarify the requirement as necessary to explain how this conflict will be resolved.

4. The drafting team has proposed a set of measures and compliance elements for the standards. If there is a measure or compliance element that you believe is incorrect, please identify this for us, being as specific as possible with a suggestion for revising the language so it is correct.

Incorrect Measure or Compliance Element:

5. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement?

Yes

No

If "Yes," please explain why and provide supporting information.

Comments:

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6. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standards.

Comments: