**UNITED STATES OF AMERICA**
**BEFORE THE**
**FEDERAL ENERGY REGULATORY COMMISSION**

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| **North American Electric Reliability Corporation** | **)**<br>**)** | **Docket No. _____** |

# PETITION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR APPROVAL OF PROPOSED RELIABILITY STANDARD MOD-031-2


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# TABLE OF CONTENTS

I. NOTICES AND COMMUNICATIONS ..... 2
II. BACKGROUND ..... 3
A. Regulatory Framework ..... 3
B. NERC Reliability Standards Development Procedure ..... 4
C. Order No. 804 ..... 4
D. Development of the Proposed Reliability Standard ..... 7
III. JUSTIFICATION FOR APPROVAL ..... 7
A. Proposed Modifications to Reliability Standard MOD-031 ..... 7
B. Enforceability of the Proposed Reliability Standards ..... 9
IV. EFFECTIVE DATE ..... 10
V. CONCLUSION ..... 10

**Exhibit A** Proposed Reliability Standard
**Exhibit B** Implementation Plan
**Exhibit C** Order No. 672 Criteria
**Exhibit D** Summary of Development History and Record of Development
**Exhibit E** Standard Drafting Team Roster

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**PETITION OF THE**
**NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION**
**FOR APPROVAL OF PROPOSED RELIABILITY STANDARD MOD-031-2**

Pursuant to Section 215(d)(1) of the Federal Power Act ("FPA"),[1] Section 39.5 of the regulations of the Federal Energy Regulatory Commission ("FERC" or "Commission"),[2] and Order No. 804,[3] the North American Electric Reliability Corporation ("NERC")[4] hereby submits for Commission approval Reliability Standard MOD-031-2 – Demand and Energy Data.[5] NERC requests that the Commission approve the proposed Reliability Standard, provided in Exhibit A hereto, as just, reasonable, not unduly discriminatory, or preferential, and in the public interest. NERC also requests approval of (1) the associated Implementation Plan (Exhibit B) and (2) the retirement of Reliability Standard MOD-031-1. As required by Section 39.5(a) of the Commission's regulations,[6] this Petition presents the technical basis and purpose of the proposed Reliability Standard, a summary of the development history (Exhibit D), and a demonstration that

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[1] 16 U.S.C. § 824o (2006).

[2] 18 C.F.R. § 39.5 (2014).

[3] *Demand and Energy Data Reliability Standard*, Order No. 804, 150 FERC ¶ 61,109 (2015).

[4] The Commission certified NERC as the electric reliability organization ("ERO") in accordance with Section 215 of the FPA on July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006) ("ERO Certification Order").

[5] Unless otherwise designated, all capitalized terms used herein shall have the meaning set forth in the *Glossary of Terms Used in NERC Reliability Standards* ("NERC Glossary"), *available at* http://www.nerc.com/files/Glossary_of_Terms.pdf.

[6] 18 C.F.R. § 39.5(a) (2013).

the proposed Reliability Standard meets the criteria identified by the Commission in Order No. 672[7] (Exhibit C).

In Order No. 804, the Commission approved Reliability Standard MOD-031-1, which provides authority for Bulk Power System planners and operators to collect demand, energy, and related data to support reliability studies and assessments, and enumerates the responsibilities and obligations of requestors and respondents of that data.[8] The Commission also directed NERC to make certain modifications to that Reliability Standard.[9] As discussed below, consistent with the directives in Order No. 804, proposed Reliability Standard MOD-031-2 improves upon MOD-031-1 by clarifying the compliance obligations related to (1) providing data to Regional Entities, and (2) responding to a request for data subject to confidentiality restrictions.

## I. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:[10]


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7 *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, FERC Stats. & Regs. ¶ 31,204, at P 262, 321-37, *order on reh'g*, Order No. 672-A, FERC Stats. & Regs. ¶ 31,212 (2006).

8 *See* Order No. 804 at PP 14-15.

9 *Id*. at P 16.

10 Persons to be included on the Commission's service list are identified by an asterisk.

## II. BACKGROUND

### A. Regulatory Framework

By enacting the Energy Policy Act of 2005,[11] Congress entrusted the Commission with the duties of approving and enforcing rules to ensure the reliability of the Nation's Bulk-Power System, and with the duty of certifying an ERO that would be charged with developing and enforcing mandatory Reliability Standards, subject to Commission approval. Section 215(b)(1) of the FPA states that all users, owners, and operators of the Bulk-Power System in the United States will be subject to Commission-approved Reliability Standards.[12] Section 215(d)(5) of the FPA authorizes the Commission to order the ERO to submit a new or modified Reliability Standard.[13] Section 39.5(a) of the Commission's regulations requires the ERO to file for Commission approval each Reliability Standard that the ERO proposes should become mandatory and enforceable in the United States, and each modification to a Reliability Standard that the ERO proposes to make effective.[14]

The Commission has the regulatory responsibility to approve Reliability Standards that protect the reliability of the Bulk-Power System and to ensure that such Reliability Standards are just, reasonable, not unduly discriminatory, or preferential, and in the public interest. Pursuant to Section 215(d)(2) of the FPA and Section 39.5(c) of the Commission's regulations, the Commission must give due weight to the technical expertise of the ERO with respect to the content of a Reliability Standard.[15]

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[11] 16 U.S.C. § 824o (2006).

[12] *Id.* § 824o(b)(1).

[13] *Id.* § 824o(d)(5).

[14] 18 C.F.R. § 39.5(a) (2012).

[15] 16 U.S.C. § 824o(d)(2); 18 C.F.R. § 39.5(c)(1).

### B. NERC Reliability Standards Development Procedure

The proposed Reliability Standard was developed in an open and fair manner and in accordance with the Commission-approved Reliability Standard development process.[16] NERC develops Reliability Standards in accordance with Section 300 (Reliability Standards Development) of its Rules of Procedure and the NERC Standard Processes Manual.[17] In its ERO Certification Order, the Commission found that NERC's proposed rules provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing Reliability Standards and thus satisfies certain of the criteria for approving Reliability Standards.[18] The development process is open to any person or entity with a legitimate interest in the reliability of the Bulk-Power System. NERC considers the comments of all stakeholders. Further, a vote of stakeholders and adoption by the NERC Board is required before NERC submits the Reliability Standard to the Commission for approval.

### C. Order No. 804

In Order No. 804, the Commission approved Reliability Standard MOD-031-1, finding that the standard "should continue to provide planners and operators access to complete and accurate demand and energy data to allow such entities to conduct their own resource adequacy analyses to serve peak demand."[19] The Commission also found that Reliability Standard MOD-031-1 "should provide for consistent documentation and information sharing practices for demand and energy

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[16] *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672 at P 334, FERC Stats. & Regs. ¶ 31,204, *order on reh'g*, Order No. 672-A, FERC Stats. & Regs. ¶ 31,212 (2006).

[17] The NERC Rules of Procedure are available at http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx. The NERC Standard Processes Manual is available at http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf.

[18] ERO Certification Order at P 250.

[19] Order No. 804 at P 14.

data, and promotes efficient planning practices across the industry and supports the identification of needed system reinforcements."[20]

While approving Reliability Standard MOD-031-1, the Commission also directed that NERC:

1. Develop a modification to MOD-031-1 to clarify that Planning Coordinators and Balancing Authorities must provide demand and energy data upon request of a Regional Entity, as necessary to support NERC's development of seasonal and long-term reliability assessments.

2. Consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential data.

*Providing Data to Regional Entities*. In Order No. 804, the Commission noted that while MOD-031-1, Requirement R3 requires Planning Authorities and Balancing Authorities to provide the Demand and energy data they collect pursuant to Requirements R1 and R2 of the standard to the applicable Regional Entity, Requirement R3 does not also obligate Planning Authorities and Balancing Authorities to provide Demand and energy data they obtain through alternative mechanisms to the Regional Entities.[21] The Commission stated that "NERC has the statutory responsibility to conduct periodic assessments of the reliability and adequacy of the Bulk-Power System, and we believe that it is incumbent on users, owners and operators subject to compliance with section 215 of the FPA to provide the necessary data to support such assessments."[22] To that

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[20] Order No. 804 at P 15.

[21] *Id*. at P 18. As NERC explained in Docket No. RM14-12-000, Requirements R1 and R2 of MOD-031-1 provide Planning Coordinators and Balancing Authorities the authority to issue data requests for Demand and energy data, but do not require them to do so as they may have alternative mechanisms to attain the data. *Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standard MOD-031-1* at 22-23, Docket No. RM14-12-000 (May 13, 2014); *Comments of the North American Electric Reliability Corporation in Response to Notice of Proposed Rulemaking* at 2-3, Docket No. RM14-12-000 (Dec. 1, 2014) (MOD-031-1 NOPR Comments).

[22] Order No. 804 at P 18. In its MOD-031-1 NOPR Comments, NERC stated that while the intent of Requirement R3 was to require Planning Coordinators and Balancing Authorities to provide the necessary data to their Regional Entities to support NERC's development of seasonal and long-term reliability assessments irrespective of the mechanisms by which they obtain the data, a strict reading of Requirement R3 indicates that it applies only to data collected pursuant to MOD-031-1. MOD-031-1 NOPR Comments at 2-3. As such, NERC

end, the Commission directed NERC to develop a modification to MOD-031 to clarify that Planning Coordinators and Balancing Authorities must provide Demand and energy data to a Regional Entity, upon request, irrespective of whether that data is collected pursuant to the Reliability Standard or through alternative arrangements.[23]

*Requests for Confidentiality Data*. Reliability Standard MOD-031-1, Requirement R4 requires applicable entities, within 45 days of a request, to share their Demand and energy data with certain other entities to help ensure that planners and operators of the Bulk-Power System have access to complete and accurate data necessary to conduct their own resource adequacy assessments. If, however, providing some or all of the requested data would conflict with the applicable entity's confidentiality, regulatory or security requirements, Requirement R4, Part 4.1 stipulates that the entity need not provide the data; however, it must respond to the requesting entity, within 30 days of the request, specifying the data that is not being provided and on what basis.

In response to comments from the Edison Electric Institute ("EEI") related to "potential conflicts" between a transmission provider's obligation to provide data under MOD-031-1 and the transmission provider's confidentiality obligations under an OATT or other confidentiality restrictions, the Commission directed NERC to consider these issues during standard development and, as necessary, clarify the compliance obligations of an applicable entity upon receipt of a request for confidential data.[24]

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committed to modify Requirement R3 to clarify that Planning Coordinators and Balancing Authorities must provide their demand and energy data to their Regional Entity whether that data is collected pursuant to MOD-031-1 or through alternative arrangements.

[23] Order No. 804 at P 18.

[24] *Id*. at PP 19-20.

### D. Development of the Proposed Reliability Standard

As further described in Exhibit D hereto, following the issuance of Order No. 804, NERC initiated a standard development project to address the directives in Order No. 804. NERC posted a Standard Authorization Request for informal comment from April 16, 2015 through May 19, 2015. Using the same standard drafting team that developed Commission-approved Reliability Standard MOD-031-1, proposed MOD-031-2 was posted for a 45-day initial comment period and ballot on July 31, 2015. The initial ballot resulted in the requisite stakeholder approval, receiving a quorum of 85.57% and an approval of 87.36%. After addressing industry comments on the initial draft of the proposed Reliability Standard, NERC posted the proposed Reliability Standard for a final ballot, which received a quorum of 89.60% and approval of 90.01%. The NERC Board of Trustees adopted proposed Reliability Standard MOD-031-2 and the associated Implementation Plan on November 5, 2015.

## III. JUSTIFICATION FOR APPROVAL

As discussed below and in Exhibit C, the proposed Reliability Standard satisfies the Commission's criteria in Order No. 672 and is just, reasonable, not unduly discriminatory, or preferential, and in the public interest. The following section provides an explanation of the manner in which the proposed Reliability Standard addresses the directives in Order No. 804.

### A. Proposed Modifications to Reliability Standard MOD-031

#### 1) Providing Data to Regional Entities

Consistent with Order No. 804, proposed Reliability Standard MOD-031-2 modifies Requirement R3 to clarify that Planning Authorities and Balancing Authorities must provide Demand and energy data to their Regional Entity, upon request, whether the Planning Authority

or Balancing Authority collected that data pursuant to Reliability Standard MOD-031 or through alternative mechanisms. Specifically, proposed Requirement R3 states:

> The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties.

In contrast, the Commission-approved version of MOD-031-1, Requirement R3 provides:

> The Planning Coordinator or the Balancing Authority shall provide the data *collected under Requirement R2* to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties.

Changing the phrase "collected under Requirement R2" to "listed under Requirement R1 Parts 1.3 through 1.5" clarifies that the requirement to provide data to a Regional Entity applies broadly to the Demand and energy data listed in Requirement R1, whether the data was collected pursuant to a data request under the standard or through alternative mechanisms. The proposed modification will help ensure that NERC and the Regional Entities have the necessary data to conduct reliability assessments.

2) Requests for Confidential Data

After considering EEI's comments on potential confidentiality conflicts, the standard drafting team modified Requirement R4 to clarify that an entity "shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; *unless providing the requested data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements*." (Emphasis added). The standard drafting team concluded that it could not anticipate all the various confidentiality restrictions that might apply to Demand and energy data and tailor the language of the requirement to account for every type of confidentiality restriction. Instead, in the Rationale for Requirement R4, appended to proposed MOD-031-2, the standard drafting team explained:

> The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to have additional time to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

In short, if data is subject to a confidentiality restriction that prohibits the sharing of that data, the entity need not provide that data. It is the responsibility of each entity receiving a data request under Requirement R4, however, to understand any confidentiality obligations applicable to the requested data and act accordingly.

### B. Enforceability of the Proposed Reliability Standards

The proposed Reliability Standard includes VRFs and VSLs. The VRFs and VSLs provide guidance on the way that NERC will enforce the requirements of the proposed Reliability Standard. The VRFs and VSLs for the proposed Reliability Standard comport with NERC and Commission guidelines related to their assignment.

The proposed Reliability Standard also include measures that support each requirement by clearly identifying what is required and how the ERO will enforce the requirement. These measures help ensure that the requirements will be enforced in a clear, consistent, and non-preferential manner and without prejudice to any party.[25]

[25] Order No. 672 at P 327.

## IV. EFFECTIVE DATE

NERC respectfully requests that the Commission approve the proposed Reliability Standards to become effective as set forth in the proposed Implementation Plan, provided in Exhibit B hereto. The proposed Implementation Plan is designed to match the effective date of the proposed Reliability Standard with the effective date of MOD-031-1, while also ensuring that entities will have sufficient time to develop the necessary process to implement this standard following Commission approval. The Implementation Plan provides that proposed MOD-031-2 shall become effective on the later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date that this standard is approved.

## V. CONCLUSION

For the reasons set forth above, NERC respectfully requests that the Commission approve

- the proposed Reliability Standard and associated elements included in Exhibit A;
- the proposed Implementation Plan included in Exhibit B; and
- the retirement of Commission-approved Reliability Standard MOD-031-1.

Respectfully submitted,

*/s/ Shamai Elstein*

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Date: November 13, 2015

**Exhibit A**

**Proposed Reliability Standard**

**MOD-031-2 Clean Version**

## A. Introduction

1. **Title: Demand and Energy Data**

2. **Number: MOD-031-2**

3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

4. **Applicability:**

   **4.1. Functional Entities:**

   **4.1.1** Planning Authority and Planning Coordinator (hereafter collectively referred to as the "Planning Coordinator")

   This proposed standard combines "Planning Authority" with "Planning Coordinator" in the list of applicable functional entities. The NERC Functional Model lists "Planning Coordinator" while the registration criteria list "Planning Authority," and they are not yet synchronized. Until that occurs, the proposed standard applies to both "Planning Authority" and "Planning Coordinator."

   **4.1.2** Transmission Planner

   **4.1.3** Balancing Authority

   **4.1.4** Resource Planner

   **4.1.5** Load-Serving Entity

   **4.1.6** Distribution Provider

5. **Effective Date**

   **5.1.** See the MOD-031-2 Implementation Plan.

6. **Background:**

   To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

   The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management

performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## B. Requirements and Measures

**R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data ("Applicable Entities").

**1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).

**1.3.** A request to provide any or all of the following actual data, as necessary:

**1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.

**1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.

**1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.

**1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.

**1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any,

activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

**1.4.** A request to provide any or all of the following forecast data, as necessary:

**1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.

**1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.

**1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.

**1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.

**1.4.5.** Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.

**1.5.** A request to provide any or all of the following summary explanations, as necessary,:

**1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.

**1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.

**1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.

**1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.

**R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.

**R3.** The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- shall not be required to alter the format in which it maintains or uses the data;
- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; unless providing the requested data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements

**4.1.** If the Applicable Entity does not provide data requested because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the requesting entity specifying the data that is not being provided and on what basis.

**M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

#### 1.4. Additional Compliance Information

None

## Table of Compliance Elements

| R # | Time Horizon | VRF | Violation Severity Levels | | | |
|---|---|---|---|---|---|---|
| | | | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1 | Long-term Planning | Medium | N/A | N/A | N/A | The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data. |
| R2 | Long-term Planning | Medium | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5 |

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| | | | did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. |
| R3 | Long-term Planning | Medium | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 75 days | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 80 days | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 85 days | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data requested prior to 91 days |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | from the date of request but prior to 81 days from the date of the request. | from the date of request but prior to 86 days from the date of the request. | from the date of request but prior to 91 days from the date of the request. | or more from the date of the request. |
| R4 | Long-term Planning | Medium | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written resquest. | The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written resquest. |

## D. Regional Variances

None.

## E. Interpretations

None.

## F. Associated Documents

None.

## Version History

| Version | Date | Action | Change Tracking |
|---|---|---|---|
| 1 | May 6, 2014 | Adopted by the NERC Board of Trustees | |
| 1 | February 19, 2015 | FERC order approving MOD-031-1 | |
| 2 | November 5, 2015 | Adopted by the NERC Board of Trustees | |

## Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

**Rationale for R1:**

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

**Rationale for R2:**

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

**Rationale for R3:**

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

**Rationale for R4:**

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not

require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

**MOD-031-2 Redline Version**

# A. Introduction

1. **Title: Demand and Energy Data**

2. **Number: MOD-031-~~1~~2**

3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

4. **Applicability:**

   **4.1. Functional Entities:**

   **4.1.1** Planning Authority and Planning Coordinator (hereafter collectively referred to as the "Planning Coordinator")

   This proposed standard combines "Planning Authority" with "Planning Coordinator" in the list of applicable functional entities. The NERC Functional Model lists "Planning Coordinator" while the registration criteria list "Planning Authority," and they are not yet synchronized. Until that occurs, the proposed standard applies to both "Planning Authority" and "Planning Coordinator."

   **4.1.2** Transmission Planner

   **4.1.3** Balancing Authority

   **4.1.4** Resource Planner

   **4.1.5** Load-Serving Entity

   **4.1.6** Distribution Provider

5. **Effective Date**

   ~~**5.1.** MOD-031-1 shall become effective on the first day of the first calendar quarter that is twelve months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twelve months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.~~

   **5.1.** See the MOD-031-2 Implementation Plan.

6. **Background:**

   To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## B. Requirements and Measures

**R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data ("Applicable Entities").

**1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).

**1.3.** A request to provide any or all of the following actual data, as necessary:

**1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.

**1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.

**1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather

normalized annual peak hour actual Demand for the prior calendar year.

**1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.

**1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any, activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

**1.4.** A request to provide any or all of the following forecast data, as necessary:

**1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.

**1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.

**1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.

**1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.

**1.4.5.** Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.

**1.5.** A request to provide any or all of the following summary explanations, as necessary,:

**1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.

**1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.

**1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.

**1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.

**R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.

**R3.** The Planning Coordinator or the Balancing Authority shall provide the data ~~collected~~listed under Requirement ~~R2~~R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- shall not be required to alter the format in which it maintains or uses the data;
- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; ~~and~~unless providing the requested data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements
- ~~shall not be required to alter the format in which it maintains or uses the data.~~

**4.1.** If the Applicable Entity does not provide data requested~~ under this requirement~~ because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the

requesting entity specifying the data that is not being provided and on what basis.

**M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

#### 1.4. Additional Compliance Information

None

## Table of Compliance Elements

| R # | Time Horizon | VRF | Violation Severity Levels | | | |
|---|---|---|---|---|---|---|
| | | | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1 | Long-term Planning | Medium | N/A | N/A | N/A | The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data. |
| R2 | Long-term Planning | Medium | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5 |

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| | | | did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. |
| R3 | Long-term Planning | Medium | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data ~~collected under Requirement~~ | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data ~~collected under Requirement~~ | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data ~~collected under Requirement~~ | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data ~~collected under Requirement R2~~requested prior to 91 days or more |

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| | | | ~~R2~~requested, but did so after 75 days from the date of request but prior to 81 days from the date of the request. | ~~R2~~requested, but did so after 80 days from the date of request but prior to 86 days from the date of the request. | ~~R2~~requested, but did so after 85 days from the date of request but prior to 91 days from the date of the request. | from the date of the request. |
| R4 | Long-term Planning | Medium | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written resquest. | The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written resquest. |

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| | | | | | | |

## D. Regional Variances

None.

## E. Interpretations

None.

## F. Associated Documents

None.

## Version History

| Version | Date | Action | Change Tracking |
|---|---|---|---|
| 1 | May 6, 2014 | Adopted by the NERC Board of Trustees~~.~~ | |
| 1 | February 19, 2015 | FERC order approving MOD-031-1 | |
| 2 | November 5, 2015 | Adopted by the NERC Board of Trustees | |

## Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

**Rationale for R1:**

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

**Rationale for R2:**

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

**Rationale for R3:**

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

**Rationale for R4:**

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the ~~provisions outlined in Requirement R4 below.~~Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not

require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

# Exhibit B

# Implementation Plan

# Implementation Plan

## Project 2010-04.1 Demand and Energy Data

**Implementation Plan for MOD-031-2 – Demand and Energy Data**

***Approvals Required***
MOD-031-2 – Demand and Energy Data

***Prerequisite Approvals***
There are no other standards that must receive approval prior to the approval of this standard.

***Revisions to Glossary Terms***

**N/A**

***Applicable Entities***

Planning Coordinator and Planning Authority

Transmission Planner

Resource Planner

Balancing Authority

Load-Serving Entity

Distribution Provider

***Applicable Facilities***
N/A

***Conforming Changes to Other Standards***
None

***Effective Dates***

MOD-031-2 shall become effective as follows:

The later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is

required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

***Justification***

The six-month implementation period will provide sufficient time for the applicable entities to develop the necessary process to implement this standard.

***Retirements***

MOD-031-1 shall be retired at 11:59:59 p.m. of the day immediately prior to the effective date of MOD-031-2 in the particular jurisdiction in which the new standard is becoming effective.

# Exhibit C

# Order No. 672 Criteria

**EXHIBIT C**

**Order No. 672 Criteria**

In Order No. 672,[1] the Commission identified a number of criteria it will use to analyze Reliability Standards proposed for approval to ensure they are just, reasonable, not unduly discriminatory or preferential, and in the public interest. The discussion below identifies these factors and explains how the proposed Reliability Standard has met or exceeded the criteria:

1. **Proposed Reliability Standards must be designed to achieve a specified reliability goal and must contain a technically sound means to achieve that goal.[2]**

Proposed Reliability Standard MOD-031-2 achieves the specific reliability goal of ensuring that Demand and energy data necessary to support reliability assessments conducted by the ERO and Bulk-Power System planners and operators is available to such entities. The proposed Reliability Standard enumerates the responsibilities of applicable entities with respect to the provision and/or collection of Demand and energy data. By providing for consistent documentation and information sharing practices for the collection and aggregation of such data, proposed Reliability Standard MOD-031-1 promotes efficient planning practices and supports the identification of needed system reinforcements. The modifications in proposed MOD-031-2 clarify the compliance obligations related to (1) providing data to Regional Entities, and (2) responding to a request for data subject to confidentiality restrictions.

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[1] *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, FERC Stats. & Regs. ¶ 31,204, *order on reh'g*, Order No. 672-A, FERC Stats. & Regs. ¶ 31,212 (2006).

[2] Order No. 672 at PP 321, 324.

2. **Proposed Reliability Standards must be applicable only to users, owners and operators of the bulk power system, and must be clear and unambiguous as to what is required and who is required to comply.**[3]

The proposed Reliability Standard is clear and unambiguous as to what is required and who is required to comply, in accordance with Order No. 672. The proposed Reliability Standard applies to Planning Coordinators, Transmission Planners, Balancing Authorities, Resource Planners, Load Serving Entities and Distribution Providers. The proposed Reliability Standard clearly articulates the actions that such entities must take to comply with the standard.

3. **A proposed Reliability Standard must include clear and understandable consequences and a range of penalties (monetary and/or non-monetary) for a violation.**[4]

The Violation Risk Factors ("VRFs") and Violation Severity Levels ("VSLs") for the proposed Reliability Standard comport with NERC and Commission guidelines related to their assignment. The assignment of the severity level for each VSL is consistent with the corresponding requirement and the VSLs should ensure uniformity and consistency in the determination of penalties. The VSLs do not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations. For these reasons, the proposed Reliability Standard includes clear and understandable consequences in accordance with Order No. 672.

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[3] Order No. 672 at PP 322, 325.

[4] Order No. 672 at P 326.

4. **A proposed Reliability Standard must identify clear and objective criterion or measure for compliance, so that it can be enforced in a consistent and non-preferential manner.** [5]

The proposed Reliability Standard contains measures that support each requirement by clearly identifying what is required to demonstrate compliance. These measures help provide clarity regarding the manner in which the requirements will be enforced, and help ensure that the requirements will be enforced in a clear, consistent, and non-preferential manner and without prejudice to any party.

5. **Proposed Reliability Standards should achieve a reliability goal effectively and efficiently — but do not necessarily have to reflect "best practices" without regard to implementation cost or historical regional infrastructure design.**[6]

The proposed Reliability Standard achieves the reliability goal effectively and efficiently in accordance with Order No. 672. The proposed Reliability Standard clearly enumerates the responsibilities of applicable entities with respect to the provision and/or collection of Demand and energy data necessary to support reliability assessments.

6. **Proposed Reliability Standards cannot be "lowest common denominator," *i.e.*, cannot reflect a compromise that does not adequately protect Bulk-Power System reliability. Proposed Reliability Standards can consider costs to implement for smaller entities, but not at consequences of less than excellence in operating system reliability.**[7]

The proposed Reliability Standard does not reflect a "lowest common denominator" approach. To the contrary, the proposed Reliability Standard contains significant benefits for the Bulk-Power System. The requirements of the proposed Reliability Standard help ensure that

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[5] Order No. 672 at P 327.

[6] Order No. 672 at P 328.

[7] Order No. 672 at P 329-30.

entities that conduct reliability assessments, which are fundamental to analyzing the reliability of the grid, have access to complete and accurate data necessary to conduct those assessments.

7. **Proposed Reliability Standards must be designed to apply throughout North America to the maximum extent achievable with a single Reliability Standard while not favoring one geographic area or regional model. It should take into account regional variations in the organization and corporate structures of transmission owners and operators, variations in generation fuel type and ownership patterns, and regional variations in market design if these affect the proposed Reliability Standard.**[8]

The proposed Reliability Standard applies throughout North America and does not favor one geographic area or regional model. In fact, the proposed Reliability Standard supports the various ways in which Demand and energy data is collected across the continent.

8. **Proposed Reliability Standards should cause no undue negative effect on competition or restriction of the grid beyond any restriction necessary for reliability.**[9]

The proposed Reliability Standard has no undue negative impact on competition. The proposed Reliability Standard requires the same performance by each of the applicable Functional Entities in the provision or collection of Demand and energy data. The standard does not unreasonably restrict the available transmission capability or limit use of the Bulk-Power System in a preferential manner.

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[8] Order No. 672 at P 331.

[9] Order No. 672 at P 332. As directed by section 215 of the FPA, FERC itself will give special attention to the effect of a proposed Reliability Standard on competition. The ERO should attempt to develop a proposed Reliability Standard that has no undue negative effect on competition. Among other possible considerations, a proposed Reliability Standard should not unreasonably restrict available transmission capability on the Bulk-Power System beyond any restriction necessary for reliability and should not limit use of the Bulk-Power System in an unduly preferential manner. It should not create an undue advantage for one competitor over another.

**9. The implementation time for the proposed Reliability Standard is reasonable.[10]**

The proposed effective date for the standard is just and reasonable and appropriately balances the urgency in the need to implement the standard against the reasonableness of the time allowed for those who must comply to develop necessary procedures, software, facilities, staffing or other relevant capability. This will allow applicable entities adequate time to ensure compliance with the requirements. The proposed effective date is explained in the proposed Implementation Plan, attached as Exhibit B.

**10. The Reliability Standard was developed in an open and fair manner and in accordance with the Commission-approved Reliability Standard development process.[11]**

The proposed Reliability Standard was developed in accordance with NERC's Commission-approved, ANSI- accredited processes for developing and approving Reliability Standards. Exhibit F includes a summary of the Reliability Standard development proceedings, and details the processes followed to develop the Reliability Standards. These processes included, among other things, comment and balloting periods. Additionally, all meetings of the drafting team were properly noticed and open to the public. The initial and final ballots achieved a quorum and exceeded the required ballot pool approval levels.

**11. NERC must explain any balancing of vital public interests in the development of proposed Reliability Standards.[12]**

NERC has identified no competing public interests regarding the request for approval of the proposed Reliability Standard. No comments were received that indicated the proposed Reliability Standard conflicts with other vital public interests.

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[10] Order No. 672 at P 333.

[11] Order No. 672 at P 334.

[12] Order No. 672 at P 335.

**12. Proposed Reliability Standards must consider any other appropriate factors.[13]**

No other negative factors relevant to whether the proposed Reliability Standard is just and reasonable were identified.

[13] Order No. 672 at P 323.

**Exhibit D**

**Summary of Development History and Complete Record of Development**

## Summary of Development

## Summary of Development History

The development record for proposed Reliability Standard MOD-031-2 is summarized below.

### I. Overview of the Standard Drafting Team

When evaluating a proposed Reliability Standard, the Commission must give "due weight" to the technical expertise of the ERO.[1] The technical expertise of the ERO is derived from the standard drafting team. For this project, the standard drafting team consisted of industry experts, all with a diverse set of experiences. A roster of the standard drafting team members is included in Exhibit E.

### II. Standard Development History

#### A. Standard Authorization Request Development

To address the Commission's directives in Order No. 804,[2] NERC revised the Standard Authorization Request ("SAR") approved by the Standards Committee ("SC") for the development of Reliability Standard MOD-031-1. The revised SAR was posted for comment from April 16, 2015 through May 19, 2015 and was approved by the SC on July 28, 2015.

#### B. First Posting - Comment Period, Initial Ballot and Non-Binding Poll

Proposed Reliability Standard MOD-031-2 was posted for a 45-day comment period from July 31, 2015 through September 18, 2015 with an initial ballot held from September 9, 2015 through September 18, 2015. The initial ballot received 85.57% quorum, and 87.36% approval. The Non-Binding Poll for VRFs and VSLs received 82.90% quorum and 89.20% of supportive opinions. There were 28 sets of comments,

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[1] Section 215(d)(2) of the Federal Power Act; 16 U.S.C. §824(d) (2) (2012).

[2] *Demand and Energy Data Standard*, Order No. 804, 150 FERC ¶ 61, 109 (2015).

including comments from approximately 93 different individuals and approximately 64 companies, representing 9 of the 10 industry segments.[3]

### C. Final Ballot

After considering stakeholder comments, no substantive revisions were made to Proposed Reliability Standard MOD-031-2 and the standard was posted for a 10-final ballot period from October 6, 2015 through October 15, 2015. The proposed Reliability Standard received 89.60% quorum and 90.01% approval.

### D. Board of Trustees Adoption

Proposed Reliability Standard MOD-031-2 was adopted by the NERC Board of Trustees on November 5, 2015.

[3] NERC, *Consideration of Comments*, Project 2010-04.1, (November 5, 2015), *available at* *http://www.nerc.com/pa/Stand/Project%202010041%20MOD031%20Order%20No%20804%20Directives%20DL/2010-04_1_MOD-031_FERC_Order_No_804_Directive_MOD-031-2_Consideration_of_Comments_10062015.pdf*.

**Complete Record of Development**

# Project 2010-04.1 MOD-031 FERC Order No. 804 Directives

Related Files | 2010-04 Demand Data (MOD C)

**Status**

A final ballot for **MOD-031-2 – Demand and Energy Data** concluded **8 p.m. Eastern, Thursday, October 15, 2015.** The ballot results can be accessed via the links below. The standard will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

**Background**

FERC Order 804

The collection of demand projections requires coordination and collaboration between Planning Authorities (also referred to as "Planning Coordinators"), Transmission and Resource Planners, and Load-Serving Entities. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – will enhance the reliability of the BPS. Collection of actual demand and demand-side management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices. This project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information.

**Standard(s) Affected:** MOD-031-1 – Demand and Energy Data

**Purpose / Industry Need**

This project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information.

| Draft | Actions | Dates | Results | Consideration of Comments |
|---|---|---|---|---|
| **Draft 1**<br>MOD-031-2<br>Clean **(19)** \| Redline to Last Posted **(20)**<br>Implementation Plan **(21)** | Final Ballot<br>Info **(22)**<br>Vote | 10/06/15 - 10/15/15 | Summary **(23)**<br>Ballot Results **(24)** | |
| **Draft 1**<br>MOD-031-2<br>Clean **(6)** \| Redline to Last Approved **(7)**<br>Implementation Plan **(8)** | Initial Ballot and Non-binding Poll<br>Updated Info **(10)**<br>Info **(11)**<br>Vote | 09/09/15 - 09/18/15 | Summary **(14)**<br>Ballot Results **(15)**<br>Non-binding Poll Results **(16)** | |
| **Supporting Materials**<br>Unofficial Comment Form (Word) **(9)** | Comment Period<br>Info **(12)**<br>Submit Comments | 07/31/15 - 09/18/15 | Comments Received **(17)** | Consideration of Comments **(18)** |

| | | | | |
|---|---|---|---|---|
| Draft RSAW | Join Ballot Pools | 07/31/15 - 08/31/15 | | |
| | Info **(13)**<br><br>Send RSAW feedback to:<br>RSAWfeedback@nerc.net | 08/14/15 - 09/18/15 | | |
| SAR **(1)**<br>**Supporting Materials**<br>Unofficial Comment Form (Word) **(2)** | Comment Period<br>Info **(3)**<br>Submit Comments | 04/16/15 - 05/19/15 | Comments Received **(4)** | Consideration of Comments **(5)** |

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# Standards Authorization Request Form

When completed, please email this form to:
sarcomm@nerc.com

NERC welcomes suggestions to improve the reliability of the bulk power system through improved reliability standards. Please use this form to submit your request to propose a new or a revision to a NERC's Reliability Standard.

| Request to propose a new or a revision to a Reliability Standard | | | |
|---|---|---|---|
| Title of Proposed Standard: | Demand and Energy Data | | |
| Date Submitted: | ~~July 18, 2013~~ April 1, 2015 | | |
| SAR Requester Information | | | |
| Name: | Darrel Richardson | | |
| Organization: | NERC | | |
| Telephone: | 609-613-1848 | E-mail: | darrel.richardson@nerc.net |
| SAR Type (Check as many as applicable) | | | |
| ☐ New Standard | | ☒ Withdrawal of existing Standard | |
| ☒ Revision to existing Standard | | ☐ Urgent Action | |

| SAR Information |
|---|
| Industry Need (What is the industry problem this request is trying to solve?): |
| Resolve FERC directives from FERC Order 693 and Order 804, incorporate lessons learned, update standards, and to incorporate initiatives such as results-based, performance-based, Paragraph 81, etc. |
| Purpose or Goal (How does this request propose to address the problem described above?): |
| This is a continuation of Project 2010-04 MOD C. The revised SAR language is shown in red to ensure clarity as to the purpose of this phase of the project. The pro forma standard consolidates the reliability |

| SAR Information |
| --- |
| components of the existing standards. This phase of the project proposes to revise MOD-031-1 to resolve the two directives from FERC Order 804. |
| Identify the Objectives of the proposed standard's requirements (What specific reliability deliverables are required to achieve the goal?): |
| The objectives are to address the outstanding directives from FERC Order 693 and Order 804, remove ambiguity from the requirements, and incorporate lessons learned. |
| Brief Description (Provide a paragraph that describes the scope of this standard action.) |
| An informal development ad hoc group is presenting a pro forma standard that consolidates the existing MOD-016-1.1, MOD-017-0.1, MOD-018-0, MOD-019-0.1 and MOD-021-1 into a single standard. The collection of demand projections requires coordination and collaboration between Planning Authorities (also referred to as "Planning Coordinators"), Transmission and Resource Planners, and Load-Serving Entities. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – will enhance the reliability of the BPS. Collection of actual demand and demand-side management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.<br><br>The pro forma standard requirements are currently placed within a new standard, MOD-031-1. This phase of the project proposes to resolve the two directives from FERC Order No. 804 to clarify (1) the obligations of the Planning Coordinator and Balancing Authority to provide data to their Regional Entity, and (2) the compliance obligations associated with requests for confidential information. |
| Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR. Also provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.) |
| ~~Detailed description of this project can be found in the Technical White Paper of this SAR submittal package.~~ This phase of the project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the Order 804 directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information. |

| Reliability Functions | |
|---|---|
| The Standard will Apply to the Following Functions (Check each one that applies.) | |
| ☐ Regional Reliability Organization | Conducts the regional activities related to planning and operations, and coordinates activities of Responsible Entities to secure the reliability of the Bulk Electric System within the region and adjacent regions. |
| ☐ Reliability Coordinator | Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view. |
| ☒ Balancing Authority | Integrates resource plans ahead of time, and maintains load-interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time. |
| ☐ Interchange Authority | Ensures communication of interchange transactions for reliability evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas. |
| ☒ Planning Coordinator | Assesses the longer-term reliability of its Planning Coordinator Area. |
| ☒ Resource Planner | Develops a >one year plan for the resource adequacy of its specific loads within a Planning Coordinator area. |
| ☒ Transmission Planner | Develops a >one year plan for the reliability of the interconnected Bulk Electric System within its portion of the Planning Coordinator area. |
| ☐ Transmission Service Provider | Administers the transmission tariff and provides transmission services under applicable transmission service agreements (e.g., the pro forma tariff). |
| ☐ Transmission Owner | Owns and maintains transmission facilities. |
| ☐ Transmission Operator | Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area. |
| ☒ Distribution Provider | Delivers electrical energy to the End-use customer. |
| ☐ Generator Owner | Owns and maintains generation facilities. |
| ☐ Generator Operator | Operates generation unit(s) to provide real and reactive power. |

| Reliability Functions | | |
|---|---|---|
| ☐ | Purchasing-Selling Entity | Purchases or sells energy, capacity, and necessary reliability-related services as required. |
| ☐ | Market Operator | Interface point for reliability functions with commercial functions. |
| ☒ | Load-Serving Entity | Secures energy and transmission service (and reliability-related services) to serve the End-use Customer. |

| Reliability and Market Interface Principles | |
|---|---|
| Applicable Reliability Principles (Check all that apply). | |
| ☒ | 1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards. |
| ☒ | 2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand. |
| ☒ | 3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably. |
| ☐ | 4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented. |
| ☐ | 5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems. |
| ☐ | 6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions. |
| ☐ | 7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis. |
| ☐ | 8. Bulk power systems shall be protected from malicious physical or cyber attacks. |

| Does the proposed Standard comply with all of the following Market Interface Principles? | Enter (yes/no) |
|---|---|
| 1. A reliability standard shall not give any market participant an unfair competitive advantage. | Yes |
| 2. A reliability standard shall neither mandate nor prohibit any specific market structure. | Yes |
| 3. A reliability standard shall not preclude market solutions to achieving compliance with that standard. | Yes |

| Reliability and Market Interface Principles | |
|---|---|
| 4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. | Yes |

| Related Standards | |
|---|---|
| Standard No. | Explanation |
| MOD-001-1a | Available Transmission System Capability |
| MOD-016-1.1 | Documentation of Data Reporting Requirements for Actual and Forecast Demands, Net Energy for Load, Controllable Demand-Side Management |
| MOD-017-0.1 | Aggregated Actual and Forecast Demands and Net Energy for Load |
| MOD-018-0 | Treatment of Nonmember Demand Data and How Uncertainties are Addressed in the Forecasts of Demand and Net Energy for Load |
| MOD-019-0.1 | Reporting of Interruptible Demands and Direct Control Load Management |
| MOD-021-1 | Documentation of the Accounting Methodology for the Effects of Demand-Side Management in Demand and Energy Forecasts |

| Related SARs | |
|---|---|
| SAR ID | Explanation |
| | |
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| | |
| | |

| Related SARs | |
|---|---|
| | |

| Regional Variances | |
|---|---|
| Region | Explanation |
| ERCOT | None |
| FRCC | None |
| MRO | None |
| NPCC | None |
| RFC | None |
| SERC | None |
| SPP | None |
| WECC | None |

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# Unofficial Comment Form

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives
## MOD-031-2 Standard Authorization Request

**DO NOT** use this form for submitting comments. Use the electronic form to submit comments on the Standard Authorization Request (SAR) recommendation to modify MOD-031-1 to address FERC Order No. 804 directives. Comments must be submitted by **8 p.m. Eastern Tuesday, May 19, 2015**.

Documents and information about this project are available on the project page. If you have questions, contact Senior Standards Developer, Darrel Richardson (via email), or at 609-613-1848.

### Background Information

The collection of demand projections requires coordination and collaboration between Planning Authorities (also referred to as "Planning Coordinators"), Transmission and Resource Planners, and Load-Serving Entities. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – will enhance the reliability of the BPS. Collection of actual demand and demand-side management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices. This project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information.

## Questions

1. Do you agree that MOD-031-1 Requirement R3 needs clarity regarding certain obligations to provide data to the Regional Entity? If not, please explain.

   Yes:

   No:

   Comments:

2. Do you agree that the standard needs additional clarity regarding the obligations of an applicable entity upon receipt of a data request that seeks confidential information? If not, please explain.

   Yes:

   No:

   Comments:

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# Standards Announcement

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives Standard Authorization Request

**Informal Comment Period Open through May 19, 2015**

**Commenting for this project is in the Standards Balloting & Commenting System (SBS)**

**Now Available**

A 30-day informal comment period for the **Project 2010-04.1 MOD-031 FERC Order No. 804 Directives** Standard Authorization Request (SAR) is open through **8 p.m. Eastern, Tuesday, May 19, 2015**.

**SBS Login, Registration, Validation and Permissions**

To **comment** in the SBS, you must have a contributor, voter, or proxy role.

**Commenting**

Use the electronic form to submit comments on the SAR. If you experience any difficulties in using the electronic form, contact Arielle Cunningham. An off-line, unofficial Word version of the comment form is posted on the project page.

For information on the **Standards Development Process**, refer to the Standard Processes Manual.

For more information or assistance, contact Senior Standards Developer, Darrel Richardson (via email) or by phone at (609) 613-1848.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

# Survey Report

## Survey Details

**Name** 2010-04.1 FERC Order 804 Directive | MOD-031 SAR

**Description**

**Start Date** 4/16/2015

**End Date** 5/19/2015

**Associated Ballots**

### Survey Questions

***1. Do you agree that MOD-031-1 Requirement R3 needs clarity regarding certain obligations to provide data to the Regional Entity? If not, please explain.***

***Yes***

***No***

***2. Do you agree that the standard needs additional clarity regarding the obligations of an applicable entity upon receipt of a data request that seeks confidential information? If not, please explain.***

***Yes***
***No***

---

## Responses By Question

***1. Do you agree that MOD-031-1 Requirement R3 needs clarity regarding certain obligations to provide data to the Regional Entity? If not, please explain.***

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

Dominion believes the current requirement clearly states which entities must provide data to the Regional Entity when requested. However, we also acknowledge the FERC directive to develop a modification to clarify certain obligations to provide data to the Regional Entity.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

*The SRC agrees that the Regions and the ERO should have access to the R1-defined data whether or not the data was obtained as a result of an ad hoc request.*

*The SRC also suggests that any revised requirement be clear that the*

*obligation is specific to the data defined in R1.3 to R1.5. Linking R3 to the specific data in R1 would clarify that the ERO and the Regions should not be inundated with specialized or ad hoc data that are unrelated to the ERO and Regional studies.*

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC**

Selected Answer: Yes

**Answer Comment:**

**We agree that the Responsible Entities should comply with the data request by the REs, but suggest that the data to be provided should be confined to those listed under R1 only rather than any data.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Gul Khan - Oncor Electric Delivery - 2 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: No

**Answer Comment:**

R3 clearly states the PC or BA is to provide to the RE ***only*** the data collected under Requirement R2.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the SRC's comments in response to this survey.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

The SDT developing the changes should consider the data request requirements of TOP-003-2 – Operational Reliability Data, R2 for possible duplication. TOP-003-2, R2 requires the BA to create a documented specification for data collection.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**faranak sarbaz - Los Angeles Department of Water and Power - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

Selected Answer: No

**Answer Comment:**

AEP believes that MOD-31-1 R3 is sufficiently clear as written.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

As commented on during the development of MOD-031-1, we believe that Requirement R3 should be removed from the standard. The authority of the ERO Enterprise to request demand and energy data for the purpose of preparing reliability assessments is sufficiently addressed by Sections

1600 and 800 of the NERC Rules of Procedure (ROP) -- at least within the portions of the United States that are described in 18 CFR 39.2(a). The procedural steps outlined in section 1602 of the NERC ROP are the preferred method for NERC (and Regional Entities) to follow when it needs to collect data from registered entities. Within this process, NERC must "make its case" when requesting data or information by providing a proposed request to FERC (for informational purposes) in advance of posting publicly, posting the proposed request for a forty-five (45) day public comment period, evaluating any comments received, making revisions following receipt of comments as deemed appropriate, and submitting the proposed request to the NERC Board of Trustees for authorization. Section 1602, Part 2.2.1 also describes the minimum information that NERC shall provide for a proposed request. This process provides greater transparency for registered entities and other stakeholders.

Our position is that reliability assessments prepared by the ERO Enterprise, while informative, do not pose a significant threat to reliability of the Bulk-Power System in their absence. Provisions for NERC to request, and registered entities to provide, demand and energy data are therefore appropriately covered in the NERC ROP and should not be part of a Reliability Standard requirement. Therefore, our recommendation for addressing this FERC directive is to remove Requirement R3 from MOD-031-1.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Teresa Czyz - Georgia Transmission Corporation - 1 - SERC**

Selected Answer: No

**Answer Comment:**

GTC agrees with the comments provided by ACES Power:

We believe that Requirement R3 is a classic Paragraph 81 requirement and should be retired in its entirety. Requirement R3 clearly meets criteria B1 – Administrative and B2 – Data Collection/Data Retention. The requirement meets criteria B1 and B2 because it is administrative in nature, requires the documentation of prior events (i.e. historical load) and "should be collected via some other method under NERC's rule and processes." NERC has a whole host of other data collection processes available via the Rules of Procedure (ROP) that are more efficient because they do not require compliance monitoring. As an example, a standing ROP Section 1600 data request could be used for NERC to gather load forecast data from BAs and PCs. Furthermore, there is already a precedent to use this data collection tool in the collection of TADS and GADS data. The bottom line is that this data is easily available to the Regional Entities without the need for Requirement R3.

While we understand that NERC must comply with the FERC directive to clarify R3, FERC allows alternative approaches that address their concerns that are equally as efficient and effective. Striking the requirement in its entirety with an explanation in the filing regarding how NERC and the Regional Entities use the ROP section 1600 data requests to gather demand and energy data to support NERC's development of seasonal and long-term reliability assessments would clearly meet an equally efficient and effective alternative. In fact, it is a superior approach to gathering the data because it does not involve compliance monitoring staff resulting in efficiency gains. This would especially hold true given that the Regional Entities or NERC have always been able to gather timely demand and energy data for the development of reliability assessments. Is Requirement R3's purpose to document part of the seasonal and long-term reliability assessment processes?

To further support the retirement of Requirement R3, we point to

NERC's initiatives to focus on the biggest risks to reliability of the Bulk Power System (BPS). NERC has developed risk elements to assist each Regional Entity in assessing risk and data submittals are categorized as low risk. We cannot support the revision of R3, as we feel that not only does it meet P81 criteria and there are equally efficient and effective alternatives to the requirement, but also it would be a low risk element that would not be monitored anyway. We urge the standard drafting teams to review requirements under the new approach of risk based compliance monitoring and enforcement to determine if the requirements that are being proposed will mitigate moderate to high risks to the BPS. In this case, R3 will not mitigate moderate or high risks and should be retired.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

If an auditor were to choose to penalize an entity for obtaining the data through some method less burdensome than an R1 data request, that would be ridiculous. But common sense does not always prevail, so I suppose that means that clarification is necessary. MOD timelines should be flexible/recognize when data requests become subject to corporate confidentiality procedures.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We agree that the Responsible Entities should comply with the data request by the Regional Entities, but suggest that the data to be provided should be confined to that listed under R1 only rather than any data. The data request should be limited to that data necessary to support NERC's development of seasonal and long-term reliability assessments [FERC Order 804 paragraph 18].

The detailed description of the SAR says a modification of requirement R3 will occur. The SAR should allow for a separate requirement to be developed. This may be necessary because the data collection process may be via an alternative collection mechanism other than R2.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Duke Energy agrees that clarification is needed.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

We believe that Requirement R3 is a classic Paragraph 81 requirement and should be retired in its entirety. Requirement R3 clearly meets criteria B1 – Administrative and B2 – Data Collection/Data Retention. The requirement meets criteria B1 and B2 because it is administrative in nature, requires the documentation of prior events (i.e. historical load) and "should be collected via some other method under NERC's rule and processes." NERC has a whole host of other data collection processes available via the Rules of Procedure (ROP) that are more efficient because they do not require compliance monitoring. As an

example, a standing ROP Section 1600 data request could be used for NERC to gather load forecast data from BAs and PCs. Furthermore, there is already a precedent to use this data collection tool in the collection of TADS and GADS data. The bottom line is that this data is easily available to the Regional Entities without the need for Requirement R3.

While we understand that NERC must comply with the FERC directive to clarify R3, FERC allows alternative approaches that address their concerns that are equally as efficient and effective. Striking the requirement in its entirety with an explanation in the filing regarding how NERC and the Regional Entities use the ROP section 1600 data requests to gather demand and energy data to support NERC's development of seasonal and long-term reliability assessments would clearly meet an equally efficient and effective alternative. In fact, it is a superior approach to gathering the data because it does not involve compliance monitoring staff resulting in efficiency gains. This would especially hold true given that the Regional Entities or NERC have always been able to gather timely demand and energy data for the development of reliability assessments. Is Requirement R3's purpose to document part of the seasonal and long-term reliability assessment processes?

To further support the retirement of Requirement R3, we point to NERC's initiatives to focus on the biggest risks to reliability of the Bulk Power System (BPS). NERC has developed risk elements to assist each Regional Entity in assessing risk and data submittals are categorized as low risk. We cannot support the revision of R3, as we feel that not only does it meet P81 criteria and there are equally efficient and effective alternatives to the requirement, but also it would be a low risk element that would not be monitored anyway. We urge the standard drafting teams to review requirements under the new approach of risk based compliance monitoring and enforcement to determine if the requirements that are being proposed will mitigate moderate to high risks to the BPS. In this case, R3 will not mitigate moderate or high risks and should be retired.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

Texas RE recommends providing clarity in order to deter entities from activities that do not support reliability.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Chris Scanlon - Exelon - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We would suggest to the drafting team to include in Requirement R3 some alternative language suggesting how to handling 'confidential' information appropriately and its listed as followed: 'The Planning Coordinator or the Balancing Authority shall provide the data collected (public and confidential should be handle appropriately) under Requirement R2 to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties'. Also, we would like the drafting team to add some clarity on whether the data request is applicable to the entities specific Regional Entity or can any Regional Entity request the data from the applicable Planning Coordinator or Balancing Authority?

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: No

**Answer Comment:**

BPA believes one does not need to give confidential information regarding individual entities when providing details about expected future conditions when looking at the entire electrical system. There may be times when the expected outcome is large enough that individual entities activities can be discerned. Given that planning must be done with confidential information, if clarifying language were provided, BPA suggests that it limits distribution of the data by the receiving entity and does not limit what is communicated - - or in other words, language that indicates all details or communication of the information must be directed to the organization that initiated the document.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

Requirement 3 has sufficient clarity

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***2. Do you agree that the standard needs additional clarity regarding the obligations of an applicable entity upon receipt of a data request that seeks confidential information? If not, please explain.***

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

Dominion believes that NERC's Rules of Procedure, Section 1500 adequately addresses this.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

*The SRC submits that Requirements R2 and R4 should be revised to provide that the requested data shall be returned to the Applicable Entity subject confidentiality requirements and agreements. This clarification would ensure that entities explore all possible avenues for provision of data that could be deemed confidential prior to exercising its right to refuse provision under Requirement 4.1.*

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Gul Khan - Oncor Electric Delivery - 2 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: No

**Answer Comment:**

CPS Energy believes that 4.1 provides the Applicable Entity sufficient rights to refuse to provide the data under 1) failure of the requesting entity to provide a "demonstrated need" for the data or 2) providing the data would confict with the Applicable Entity's confidentiality, regulatory, or security requirements.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the SRC's comments in response to this survey.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**faranak sarbaz - Los Angeles Department of Water and Power - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

Selected Answer: No

**Answer Comment:**

MOD-031-1 replaces a number of other MOD standards where the topic of confidential information was not explicitly addressed. AEP believes that MOD-031-1 R4.1 is sufficiently clear as written in regards to the obligations of an applicable entity that receives a request for potentially confidential information.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

In light of our recommendation to remove Requirement R3 from the

MOD-031 Reliability Standard (see response to question #1), the emphasis of the standard will primarily be directed at the authority of the Planning Coordinator or Balancing Authority to request demand and energy data from the other applicable entities (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider) for the purpose of supporting reliability studies and assessments that are performed by the Planning Coordinator or Balancing Authority. If there are no pre-existing agreements that address data confidentiality between the requesting entity (Planning Coordinator or Balancing Authority) and the submitting entity (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider), we can understand that this may be a cause of concern with the submitting entity (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider).

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Teresa Czyz - Georgia Transmission Corporation - 1 - SERC**

Selected Answer: Yes

**Answer Comment:**

Again, GTC agrees with the comments provided by ACES Power:

We agree additional clarity is needed and recommend removing redundancies in R4. First, R4 should be clarified so that no Resource Planner (RP) can request energy and demand data from another RP. There simply is no situation in which one RP needs another RP's data. This is a FERC standards of conduct issue as it deals with competition between RPs. Second, R4 should not include the PC and BA

as requesting entities since they will already be requesting data via R1. These two steps alone will eliminate the majority of the ambiguity and redundancy.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

I agree that confidential information disclosures require clarity in light of corporate customer data protection policies and the potential impact resolution of a policy compliant response has on the information request time requirements identified in the MOD. However, with requests at system level, conflicts occurences would be an infrequent exception.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Duke Energy agrees that clarification is needed.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We agree additional clarity is needed and recommend removing redundancies in R4. First, R4 should be clarified so that no Resource Planner (RP) can request energy and demand data from another RP. There simply is no situation in which one RP needs another RP's data. This is a FERC standards of conduct issue as it deals with competition between RPs. Second, R4 should not include the PC and BA as requesting entities since they will already be requesting data via R1. These two steps alone will eliminate the majority of the ambiguity and redundancy.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

Texas RE recommends providing clarity in order to deter entities from activities that do not support reliability.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Chris Scanlon - Exelon - 1 -**

Selected Answer: No

**Answer Comment:**

Exelon doesn't think the requirement needs clarification.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We agree there should be some type of clarity added to the standard in

reference to confidential information. At this point, the current language doesn't suggest the proper handling of confidential information by any of the applicable entities. We would suggest addressing the confidential piece in Requirement R2 where the applicable entities are requesting this type of data should verify potential confidential information and the entity providing this data marking the information as such 'confidential' so there is no confusion on how this data should be handled. We also suggest to the drafting team to mention in the requirement that the data being requested is pertaining to EIA-411 and this connection needs to be re-establish on what type of data is being requested.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: No

**Answer Comment:**

BPA believes to properly plan you must provide some confidential information generically.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

No additional clarity is needed.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

# Consideration of Comments

**Project Name:** 2010-04.1 FERC Order 804 Directive | MOD-031 SAR

**Comment Period Start Date:** 4/16/2015

**Comment Period End Date:** 5/19/2015

**The Industry Segments are:**
1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

| Full Name | Entity Name | Segment(s) | Region | Group Name | Group Member Name | Group Member Organization | Group Member Region | Group Member Segment(s) |
|---|---|---|---|---|---|---|---|---|
| Jason Marshall | ACES Power Marketing | 6 | MRO,WECC,TRE,SERC,SPP,RFC | ACES Standards Collaborators | Bob Solomon | Hoosier Energy | RFC | 1 |
| | | | | | Ellen Watkins | Sunflower Electric Power Corporation | SPP | 1 |
| | | | | | Ginger Mercier | Prairie Power | SERC | 1,3 |
| | | | | | James Manning | North Carolina Electric Membership Corporation | SERC | 3,4,5 |
| | | | | | Ryan Strom | Buckeye Power | RFC | 3,4,5 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | Michael Brytowski | Great River Energy | MRO | 1,3,5,6 |
| | | | | | Shari Heino | Brazos Electric Power Cooperative | TRE | 1,5 |
| | | | | | Amber Skillern | East Kentucky Power Cooperative | SERC | 1,3 |
| | | | | | Bill Watson | Old Dominion Electric Cooperative | SERC | 3,4 |
| | | | | | Bill Watson | Old Dominion Electric Cooperative | SERC | 3,4 |
| Kaleb Brimhall | Colorado Springs Utilities | 5 | | Colorado Springs Utilities | Shawna Speer | Colorado Springs Utilities | WECC | 1 |
| | | | | | Charlie Morgan | | | 3 |
| | | | | | Shannon Fair | | | 6 |
| | | | | | Kaleb Brimhall | | | 5 |
| Louis Slade | Dominion - Dominion Resources, Inc. | 6 | | Dominion NCP | Mike Garton | NERC Compliance Policy | NPCC | 5,6 |
| | | | | | Randi Heise | | SERC | 1,3,5,6 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | Connie Lowe | | SERC | 1,3,5,6 |
| | | | | | Louis Slade | | RFC | 5,6 |
| Michael Lowman | Duke Energy | 1,3,5,6 | FRCC,SERC,RFC | Mike Lowman on Behalf of Duke Energy | Doug Hils | Duke Energy | RFC | 1 |
| | | | | | Lee Schuster | | FRCC | 3 |
| | | | | | Dale Goodwine | | SERC | 5 |
| | | | | | Greg Cecil | | RFC | 6 |
| Emily Rousseau | MRO | 1,2,3,4,5,6 | MRO | MRO-NERC Standards Review Forum (NSRF) | Joe Depoorter | Madison Gas & Electric | MRO | 3,4,5,6 |
| | | | | | Amy Casucelli | Xcel Energy | | 1,3,5,6 |
| | | | | | Chuck Lawrence | American Transmission Company | | 1 |
| | | | | | Chuck Wicklund | Otter Tail Power Company | | 1,3,5 |
| | | | | | Theresa Allard | Minnkota Power Cooperative, Inc | | 1,3,5,6 |
| | | | | | Dave Rudolph | Basin Electric Power Cooperative | | 1,3,5,6 |
| | | | | | Kayleigh Wilkerson | Lincoln Electric System | | 1,3,5,6 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | Jodi Jenson | Western Area Power Administration | | 1,6 |
| | | | | | Larry Heckert | Alliant Energy | | 4 |
| | | | | | Mahmood Safi | Omaha Public Utility District | | 1,3,5,6 |
| | | | | | Marie Knox | Midwest ISO Inc. | | 2 |
| | | | | | Mike Brytowski | Great River Energy | | 1,3,5,6 |
| | | | | | Randi Nyholm | Minnesota Power | | 1,5 |
| | | | | | Scott Nickels | Rochester Public Utilities | | 4 |
| | | | | | Terry Harbour | MidAmerican Energy Company | | 1,3,5,6 |
| | | | | | Tom Breene | Wisconsin Public Service Corporation | | 3,4,5,6 |
| | | | | | Tony Eddleman | Nebraska Public Power District | | 1,3,5 |
| Lee Pedowicz | Northeast Power | 10 | NPCC | NPCC--Project 2010- | Alan Adamson | New York State | NPCC | 10 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | Coordinating Council | | | 04.1 MOD-031 | | Reliability Council, LLC | | |
| | | | | | David Burke | Orange and Rockland Utilities Inc. | | 3 |
| | | | | | Greg Campoli | New York Independent System Operator | | 2 |
| | | | | | Sylvain Clermont | Hydro-Quebec TransEnergie | | 1 |
| | | | | | Kelly Dash | Consolidated Edison Co. of New York, Inc. | | 1 |
| | | | | | Gerry Dunbar | Northeast Power Coordinating Council | | 10 |
| | | | | | Kathleen Goodman | ISO - New England | | 2 |
| | | | | | Mark Kenny | Northeast Utilities | | 1 |
| | | | | | Helen Lainis | Independent Electricity System Operator | | 2 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | Alan MacNaughton | New Brunswick Power Corporation | | 9 |
| | | | | | Paul Malozewski | Hydro One Networks Inc. | | 1 |
| | | | | | Bruce Metruck | New York Power Authority | | 6 |
| | | | | | Lee Pedowicz | Northeast Power Coordinating Council | | 10 |
| | | | | | Robert Pellegrini | The United Illuminating Company | | 1 |
| | | | | | Si Truc Phan | Hydro-Quebec TransEnergie | | 1 |
| | | | | | David Ramkalawan | Ontario Power Generation, Inc. | | 5 |
| | | | | | Brian Robinson | Utility Services | | 8 |
| | | | | | Wayne Sipperly | New York Power Authority | | 5 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | Edward Bedder | Orange and Rockland Utilities Inc. | | 1 |
| | | | | | Peter Yost | Consolidated Edison Co. of New York, Inc. | | 3 |
| | | | | | Michael Jones | National Grid | | 1 |
| | | | | | Brian Shanahan | National Grid | | 1 |
| | | | | | Silvia Parada Mitchell | NextEra Energy, LLC | | 5 |
| | | | | | Michael Forte | Consolidated Edison Co. of New York, Inc. | | 1 |
| | | | | | Glen Smith | Entergy Services, Inc. | | 5 |
| | | | | | Brian O'Boyle | Consolidated Edison Co. of New York, Inc. | | 8 |
| | | | | | RuiDa Shu | Northeast Power Coordinating Council | | 10 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | Connie Lowe | Dominion Resources Services, Inc. | | 5 |
| Albert DiCaprio | PJM Interconnection, L.L.C. | 2 | RFC | ISO Standards Review Committee | Charles Yeung | SPP | SPP | 2 |
| | | | | | Ben Li | IESO | NPCC | |
| | | | | | Mark Holman | PJM | RFC | |
| | | | | | Kathleen Goodman | ISONE | NPCC | |
| | | | | | Greg Campoli | NYISO | NPCC | |
| | | | | | Christina V. Bigelow | ERCOT | TRE | |
| | | | | | Ali Miremadi | CAISO | WECC | |
| | | | | | Terry Bilke | MISO | RFC | |
| Shannon Mickens | Southwest Power Pool, Inc. (RTO) | 2 | SPP | SPP Standards Review Group | Shannon Mickens | Southwest Power Pool Inc. | SPP | 2 |
| | | | | | Joe Fultz | Grand River Dam Authority | | 1 |
| | | | | | Kevin Giles | Westar Energy Inc | | 1,3,5,6 |
| | | | | | James Nail | City of Independence, Missouri | | 3,5 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | Dona Parks | Grand River Dam Authority | | 1 |
| | | | | | Jason Smith | Southwest Power Pool Inc | | 2 |
| | | | | | mike Kidwell | Empire District Electric Company | | 1,3,5 |
| | | | | | Sean Simpson | Board of Public Utilities, City of McPherson | NA - Not Applicable | NA - Not Applicable |

***1. Do you agree that MOD-031-1 Requirement R3 needs clarity regarding certain obligations to provide data to the Regional Entity? If not, please explain.***

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**

Selected Answer: No

**Answer Comment:**

Dominion believes the current requirement clearly states which entities must provide data to the Regional Entity when requested. However, we also acknowledge the FERC directive to develop a modification to clarify certain obligations to provide data to the

Regional Entity.

**Response:** The SDT thanks you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

Selected Answer: Yes

**Answer Comment:**

*The SRC agrees that the Regions and the ERO should have access to the R1-defined data whether or not the data was obtained as a result of an ad hoc request.*

*The SRC also suggests that any revised requirement be clear that the obligation is specific to the data defined in R1.3 to R1.5. Linking R3 to the specific data in R1 would clarify that the ERO and the Regions should not be inundated with specialized or ad hoc data that are unrelated to the ERO and Regional studies.*

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

**Likes:** 0

**Dislikes:** 0

---

**Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC**

Selected Answer: Yes

**Answer Comment:**

**We agree that the Responsible Entities should comply with the data request by the REs, but suggest that the data to be provided should be confined to those listed under R1 only rather than any data.**

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

**Likes:** 0

**Dislikes:** 0

---

**Gul Khan - Oncor Electric Delivery - 2 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: No

**Answer Comment:**

R3 clearly states the PC or BA is to provide to the RE ***only*** the data collected under Requirement R2.

**Response:** The SDT thanks you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the SRC's comments in response to this survey.

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

The SDT developing the changes should consider the data request requirements of TOP-003-2 – Operational Reliability Data, R2 for possible duplication. TOP-003-2, R2 requires the BA to create a documented specification for data collection.

**Response:** The entire scope of the data that can be requested is within the standard and documented within the data request prepared pursuant to Requirement R1.

**Likes:** 0

**Dislikes:** 0

---

**faranak sarbaz - Los Angeles Department of Water and Power - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

Selected Answer: No

**Answer Comment:**

AEP believes that MOD-31-1 R3 is sufficiently clear as written.

**Response:** The SDT thanks you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

As commented on during the development of MOD-031-1, we believe that Requirement R3 should be removed from the standard. The authority of the ERO Enterprise to request demand and energy data for the purpose of preparing reliability assessments is sufficiently addressed by Sections 1600 and 800 of the NERC Rules of Procedure

(ROP) -- at least within the portions of the United States that are described in 18 CFR 39.2(a). The procedural steps outlined in section 1602 of the NERC ROP are the preferred method for NERC (and Regional Entities) to follow when it needs to collect data from registered entities. Within this process, NERC must "make its case" when requesting data or information by providing a proposed request to FERC (for informational purposes) in advance of posting publicly, posting the proposed request for a forty-five (45) day public comment period, evaluating any comments received, making revisions following receipt of comments as deemed appropriate, and submitting the proposed request to the NERC Board of Trustees for authorization. Section 1602, Part 2.2.1 also describes the minimum information that NERC shall provide for a proposed request. This process provides greater transparency for registered entities and other stakeholders.

Our position is that reliability assessments prepared by the ERO Enterprise, while informative, do not pose a significant threat to reliability of the Bulk-Power System in their absence. Provisions for NERC to request, and registered entities to provide, demand and energy data are therefore appropriately covered in the NERC ROP and should not be part of a Reliability Standard requirement. Therefore, our recommendation for addressing this FERC directive is to remove Requirement R3 from MOD-031-1.

**Response:**

The SDT concluded that a standard was necessary. The standard provides a more efficient and enforceable mechanism for NERC and the Regional Entities to obtain Demand data from all applicable registered entities across the entire continent. Because certain Canadian provinces have adopted only select portions of the NERC Rules of Procedure, a standard is necessary to ensure that NERC and the Regional Entities has the authority to collect the necessary data from all applicable registered entities. The data to be collected under the standard is necessary for the ERO to conduct its reliability assessments, such as the Long Term Reliability Assessment.

**Likes:** 0

**Dislikes:** 0

**Teresa Czyz - Georgia Transmission Corporation - 1 - SERC**

Selected Answer: No

**Answer Comment:**

GTC agrees with the comments provided by ACES Power:

We believe that Requirement R3 is a classic Paragraph 81 requirement and should be retired in its entirety. Requirement R3 clearly meets criteria B1 – Administrative and B2 – Data Collection/Data Retention. The requirement meets criteria B1 and B2 because it is administrative in nature, requires the documentation of prior events (i.e. historical load) and "should be collected via some other method under NERC's rule and processes." NERC has a whole host of other data collection processes available via the Rules of Procedure (ROP) that are more efficient because they do not require compliance monitoring. As an example, a standing ROP Section 1600 data request could be used for NERC to gather load forecast data from BAs and PCs. Furthermore, there is already a precedent to use this data collection tool in the collection of TADS and GADS data. The bottom line is that this data is easily available to the Regional Entities without the need for Requirement R3.

While we understand that NERC must comply with the FERC directive to clarify R3, FERC allows alternative approaches that address their concerns that are equally as efficient and effective. Striking the requirement in its entirety with an explanation in the filing regarding how NERC and the Regional Entities use the ROP section 1600 data requests to gather demand and energy data to support NERC's development of seasonal and long-term reliability assessments would clearly meet an equally efficient and effective alternative. In fact, it is a superior approach to gathering the data because it does not involve compliance monitoring staff resulting in efficiency gains. This would especially hold true given that the Regional Entities or NERC have always been able to gather timely demand and energy data for the development of reliability assessments. Is Requirement R3's purpose to document part of the seasonal and long-

term reliability assessment processes?

To further support the retirement of Requirement R3, we point to NERC's initiatives to focus on the biggest risks to reliability of the Bulk Power System (BPS). NERC has developed risk elements to assist each Regional Entity in assessing risk and data submittals are categorized as low risk. We cannot support the revision of R3, as we feel that not only does it meet P81 criteria and there are equally efficient and effective alternatives to the requirement, but also it would be a low risk element that would not be monitored anyway. We urge the standard drafting teams to review requirements under the new approach of risk based compliance monitoring and enforcement to determine if the requirements that are being proposed will mitigate moderate to high risks to the BPS. In this case, R3 will not mitigate moderate or high risks and should be retired.

**Response:** The SDT concluded that a standard was necessary. The standard provides a more efficient and enforceable mechanism for NERC and the Regional Entities to obtain Demand data from all applicable registered entities across the entire continent. Because certain Canadian provinces have adopted only select portions of the NERC Rules of Procedure, a standard is necessary to ensure that NERC and the Regional Entities has the authority to collect the necessary data from all applicable registered entities. The data to be collected under the standard is necessary for the ERO to conduct its reliability assessments, such as the Long Term Reliability Assessment.

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

If an auditor were to choose to penalize an entity for obtaining the data through some method less burdensome than an R1 data request, that would be ridiculous. But common sense does not always prevail, so I suppose that means that clarification is necessary. MOD timelines should be flexible/recognize when data requests become subject to corporate confidentiality procedures.

**Response:** The SDT has modified Requirement R3 to clearly state that an entity has to respond to a request from its Regional Entity regardless of how the data is collected. If there are known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Selected Answer: Yes

**Answer Comment:**

We agree that the Responsible Entities should comply with the data request by the Regional Entities, but suggest that the data to be provided should be confined to that listed under R1 only rather than any data. The data request should be limited to that data necessary to support NERC's development of seasonal and long-term reliability assessments [FERC Order 804 paragraph 18].

The detailed description of the SAR says a modification of requirement R3 will occur. The SAR should allow for a separate requirement to be developed. This may be necessary because the data collection process may be via an alternative collection mechanism other than R2.

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

**Likes:** 0

**Dislikes:** 0

---

**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Selected Answer: Yes

**Answer Comment:**

**Duke Energy agrees that clarification is needed.**

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

**Likes:** 0

**Dislikes:** 0

---

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer: No

**Answer Comment:**

We believe that Requirement R3 is a classic Paragraph 81 requirement and should be retired in its entirety. Requirement R3 clearly meets criteria B1 – Administrative and B2 – Data Collection/Data Retention. The requirement meets criteria B1 and B2 because it is administrative in nature, requires the documentation of prior events (i.e. historical load) and "should be collected via some other method under NERC's rule and processes." NERC has a whole host of other data collection processes available via the Rules of Procedure (ROP) that are more efficient because they do not require compliance monitoring. As an example, a standing ROP Section 1600 data request could be used for NERC to gather load forecast data from BAs and PCs. Furthermore, there is already a precedent to use this data collection tool in the collection of TADS and GADS data. The bottom line is that this data is easily available to the Regional Entities without the need for Requirement R3.

While we understand that NERC must comply with the FERC directive to clarify R3, FERC allows alternative approaches that address their concerns that are equally as efficient and effective. Striking the requirement in its entirety with an explanation in the filing regarding how NERC and the Regional Entities use the ROP section 1600 data requests to gather demand and energy data to support NERC's development of seasonal and long-term reliability assessments would clearly meet an equally efficient and effective alternative. In fact, it is a superior approach to gathering the data because it does not involve compliance monitoring staff resulting in efficiency gains. This would especially hold true given that the Regional Entities or NERC have always been able to gather timely demand and energy data for the development of reliability assessments. Is Requirement R3's purpose to document part of the seasonal and long-term reliability assessment processes?

To further support the retirement of Requirement R3, we point to NERC's initiatives to focus on the biggest risks to reliability of the Bulk Power System (BPS). NERC has developed risk elements to assist each Regional Entity in assessing risk and data submittals are categorized as low risk. We cannot support the revision of R3, as we feel that not only does it meet P81 criteria and there are equally efficient and effective alternatives to the requirement, but also it would be a low risk element that would not be monitored anyway. We urge the standard drafting teams to review requirements under the new approach of risk based compliance monitoring and enforcement to determine if the requirements that are being proposed will mitigate moderate to high risks to the BPS. In this case, R3 will not mitigate moderate or high risks and should be retired.

**Response:** The SDT concluded that a standard was necessary. The standard provides a more efficient and enforceable mechanism for NERC and the Regional Entities to obtain Demand data from all applicable registered entities across the entire continent. Because certain Canadian provinces have adopted only select portions of the NERC Rules of Procedure, a standard is necessary to ensure that NERC and the Regional Entities has the authority to collect the necessary data from all applicable registered entities. The data to be collected under the standard is necessary for the ERO to conduct its reliability assessments, such as the Long Term Reliability Assessment.

**Likes:** 0

**Dislikes:** 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

Texas RE recommends providing clarity in order to deter entities from activities that do not support reliability.

**Response:**

Requested area's regional entity, PC or BA should not be requesting any data for any other purposes than reliability. Regional Entity bylaws and delegation agreements are limited to reliability needs. The concerns with other entities requesting data is covered in Requirement R4.

**Likes:** 0

**Dislikes:** 0

---

**Chris Scanlon - Exelon - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Selected Answer: Yes

**Answer Comment:**

We would suggest to the drafting team to include in Requirement R3 some alternative language suggesting how to handling 'confidential' information appropriately and its listed as followed: 'The Planning Coordinator or the Balancing Authority shall provide the data collected (public and confidential should be handle appropriately) under Requirement R2 to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties'. Also, we would like the drafting team to add some clarity on whether the data request is applicable to the entities specific Regional Entity or can any Regional Entity request the data from the applicable Planning Coordinator or Balancing Authority?

**Response:**

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500).

The SDT has also modified Requirement R3 to address your issue concerning the specific Regional Entity.

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: No

**Answer Comment:**

BPA believes one does not need to give confidential information regarding individual entities when providing details about expected future conditions when looking at the entire electrical system. There may be times when the expected outcome is large enough that individual entities activities can be discerned. Given that planning must be done with confidential information, if clarifying language were provided, BPA suggests that it limits distribution of the data by the receiving entity and does not limit what is communicated - - or in other words, language that indicates all details or communication of the information must be directed to the organization that initiated the document.

**Response:**

The SDT has modified Requirement R3 to clearly state that an entity has to respond to a request from its Regional Entity regardless of how the data is collected.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500).

If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

Requirement 3 has sufficient clarity

**Response:** The SDT thanks you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

***2. Do you agree that the standard needs additional clarity regarding the obligations of an applicable entity upon receipt of a data request that seeks confidential information? If not, please explain.***

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**

Selected Answer: No

**Answer Comment:**

Dominion believes that NERC's Rules of Procedure, Section 1500 adequately addresses this.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

Selected Answer: Yes

**Answer Comment:**

*The SRC submits that Requirements R2 and R4 should be revised to provide that the requested data shall be returned to the Applicable Entity subject confidentiality requirements and agreements. This clarification would ensure that entities explore all possible avenues for provision of data that could be deemed confidential prior to exercising its right to refuse provision under Requirement 4.1.*

**Response:** The SDT modified Requirement R4 to provide additional clarity regarding confidentiality. The SDT has also added language to the rationale for Requirement R4 to further explain the applicability of confidentiality.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to

the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:** 0

**Dislikes:** 0

---

**Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Gul Khan - Oncor Electric Delivery - 2 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: No

**Answer Comment:**

CPS Energy believes that 4.1 provides the Applicable Entity sufficient rights to refuse to provide the data under 1) failure of the requesting entity to provide a "demonstrated need" for the data or 2) providing the data would confict with the Applicable Entity's confidentiality, regulatory, or security requirements.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the SRC's comments in response to this survey.

**Response:**

The SDT modified Requirement R4 to provide additional clarity regarding confidentiality. The SDT has also added language to the rationale for Requirement R4 to further explain the applicability of confidentiality.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**faranak sarbaz - Los Angeles Department of Water and Power - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

Selected Answer: No

**Answer Comment:**

MOD-031-1 replaces a number of other MOD standards where the topic of confidential information was not explicitly addressed. AEP believes that MOD-031-1 R4.1 is sufficiently clear as written in regards to the obligations of an applicable entity that receives a request for potentially confidential information.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

In light of our recommendation to remove Requirement R3 from the MOD-031 Reliability Standard (see response to question #1), the emphasis of the standard will primarily be directed at the authority of the Planning Coordinator or Balancing Authority to request demand and energy data from the other applicable entities (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider) for the purpose of supporting reliability studies and assessments that are performed by the Planning Coordinator or Balancing Authority. If there are no pre-existing agreements that address data confidentiality between the requesting entity (Planning Coordinator or Balancing Authority) and the submitting entity (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider), we can understand that this may be a cause of concern with the submitting entity (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider).

**Response:**

The SDT disagrees with your comment concerning Requirement R3. Please refer to our response to your comment for question #1.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:** 0

**Dislikes:** 0

---

**Teresa Czyz - Georgia Transmission Corporation - 1 - SERC**

Selected Answer: Yes

**Answer Comment:**

Again, GTC agrees with the comments provided by ACES Power:

We agree additional clarity is needed and recommend removing redundancies in R4. First, R4 should be clarified so that no Resource Planner (RP) can request energy and demand data from another RP. There simply is no situation in which one RP needs another RP's data. This is a FERC standards of conduct issue as it deals with competition between RPs. Second, R4 should not include the PC and BA as requesting entities since they will already be requesting data via R1. These two steps alone will eliminate the majority of the ambiguity and redundancy.

**Response:**

Information concerning available Generating Resources of the Resource Planner are not included under this standard. If a Resource Planner believes that certain information is confidential, access to that information can be restricted under Requirement R4. The requesting entity's ability to demonstrate a reliability need will determine whether they have right to request the data under Requirement R4.

With regards to your comment concerning PCs and BAs being included in Requirement R4, this is referencing "other" PCs and BAs not your PC/BA.

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

I agree that confidential information disclosures require clarity in light of corporate customer data protection policies and the potential impact resolution of a policy compliant response has on the information request time requirements identified in the MOD. However, with requests at system level, conflicts occurences would be an infrequent exception.

**Response:** If there are known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Selected Answer: Yes

**Answer Comment:**

**Duke Energy agrees that clarification is needed.**

**Response:**

The SDT modified Requirement R4 to provide additional clarity regarding confidentiality. The SDT has also added language to the rationale for Requirement R4 to further explain the applicability of confidentiality.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:** 0

**Dislikes:** 0

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer: Yes

**Answer Comment:**

We agree additional clarity is needed and recommend removing redundancies in R4. First, R4 should be clarified so that no Resource Planner (RP) can request energy and demand data from another RP. There simply is no situation in which one RP needs another RP's data. This is a FERC standards of conduct issue as it deals with competition between RPs. Second, R4 should not include the PC and BA as requesting entities since they will already be requesting data via R1. These two steps alone will eliminate the majority of the ambiguity and redundancy.

**Response:**

Information concerning available Generating Resources of the Resource Planner are not included under this standard. If a Resource Planner believes that certain information is confidential, access to that information can be restricted under Requirement R4. The requesting entity's ability to demonstrate a reliability need will determine whether they have right to request the data under Requirement R4.

With regards to your comment concerning PCs and BAs being included in Requirement R4, this is referencing "other" PCs and BAs not your PC/BA.

**Likes:** 0

**Dislikes:** 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

Texas RE recommends providing clarity in order to deter entities from activities that do not support reliability.

**Response:**

Requested area's regional entity, PC or BA should not be requesting any data for any other purposes than reliability. Regional Entity bylaws and delegation agreements are limited to reliability needs. The concerns with other entities requesting data is covered in Requirement R4.

**Likes:** 0

**Dislikes:** 0

---

**Chris Scanlon - Exelon - 1 -**

Selected Answer: No

**Answer Comment:**

Exelon doesn't think the requirement needs clarification.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Selected Answer: Yes

**Answer Comment:**

We agree there should be some type of clarity added to the standard in reference to confidential information. At this point, the current language doesn't suggest the proper handling of confidential information by any of the applicable entities. We would suggest addressing the confidential piece in Requirement R2 where the applicable entities are requesting this type of data should verify potential confidential information and the entity providing this data marking the information as such 'confidential' so there is no confusion on how this data should be handled. We also suggest to the drafting team to mention in the requirement that the data being requested is pertaining to EIA-411 and this connection needs to be re-establish on what type of data is being requested.

**Response:** We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity,

they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard. The standard is not meant to detail the handling of confidential information.

With regards to your comment concerning EIA-411, the SDT does not want to put specifics of this type into the standard.

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: No

**Answer Comment:**

BPA believes to properly plan you must provide some confidential information generically.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

No additional clarity is needed.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

# Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

## Description of Current Draft

This is the first posting of the proposed revised standard. This proposed draft standard will be posted for a 45-day comment period and 10-day initial ballot.

| Completed Actions | Date |
|---|---|
| Standards Committee approved SAR for posting | April 15, 2015 |
| SAR posted for a 30-day informal comment period | April 16, 2015 |

| Anticipated Actions | Date |
|---|---|
| 45-day formal comment period with initial ballot | August/September 2015 |
| Final ballot | October 2015 |
| NERC Board adoption | November 2015 |

## New or Modified Terms Used in NERC Reliability Standards

This section includes all new or modified terms used in the proposed standard that will be included in the *Glossary of Terms Used in NERC Reliability Standards* upon applicable regulatory approval. Terms used in the proposed standard that are already defined and are not being modified can be found in the *Glossary of Terms Used in NERC Reliability Standards*. The new or revised terms listed below will be presented for approval with the proposed standard.

**Term:** None

## A. Introduction

1. **Title: Demand and Energy Data**

2. **Number: MOD-031-2**

3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

4. **Applicability:**

   **4.1. Functional Entities:**

   **4.1.1** Planning Authority and Planning Coordinator (hereafter collectively referred to as the "Planning Coordinator")

   This proposed standard combines "Planning Authority" with "Planning Coordinator" in the list of applicable functional entities. The NERC Functional Model lists "Planning Coordinator" while the registration criteria list "Planning Authority," and they are not yet synchronized. Until that occurs, the proposed standard applies to both "Planning Authority" and "Planning Coordinator."

   **4.1.2** Transmission Planner

   **4.1.3** Balancing Authority

   **4.1.4** Resource Planner

   **4.1.5** Load-Serving Entity

   **4.1.6** Distribution Provider

5. **Effective Date**

   **5.1.** See the MOD-031-2 Implementation Plan.

6. **Background:**

   To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

   The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management

performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## B. Requirements and Measures

**R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data ("Applicable Entities").

**1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).

**1.3.** A request to provide any or all of the following actual data, as necessary:

**1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.

**1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.

**1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.

**1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.

**1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any,

activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

**1.4.** A request to provide any or all of the following forecast data, as necessary:

**1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.

**1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.

**1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.

**1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.

**1.4.5.** Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.

**1.5.** A request to provide any or all of the following summary explanations, as necessary,:

**1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.

**1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.

**1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.

**1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.

**R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.

**R3.** The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**Rationale for R4:** This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requiement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

**R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or

otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; and
- shall not be required to provide any requested data that, if provided, would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements; and
- shall not be required to alter the format in which it maintains or uses the data.

**4.1.** If the Applicable Entity does not provide data requested under this requirement because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the requesting entity specifying the data that is not being provided and on what basis.

**M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

#### 1.4. Additional Compliance Information

None

## Table of Compliance Elements

| R # | Time Horizon | VRF | Violation Severity Levels | | | |
|---|---|---|---|---|---|---|
| | | | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1 | Long-term Planning | Medium | N/A | N/A | N/A | The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data. |
| R2 | Long-term Planning | Medium | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5 |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. |
| R3 | Long-term Planning | Medium | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data collected under Requirement R2 prior to 91 |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | did so after 75 days from the date of request but prior to 81 days from the date of the request. | did so after 80 days from the date of request but prior to 86 days from the date of the request. | did so after 85 days from the date of request but prior to 91 days from the date of the request. | days or more from the date of the request. |
| R4 | Long-term Planning | Medium | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written resquest. | The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written resquest. |

## D. Regional Variances

None.

## E. Interpretations

None.

## F. Associated Documents

None.

## Version History

| Version | Date | Action | Change Tracking |
|---|---|---|---|
| 1 | May 6, 2014 | Adopted by the NERC Board of Trustees. | |
| 1 | February 19, 2015 | FERC order approving MOD-031-1 | |
| | | | |

## Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

**Rationale for R1:**

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

**Rationale for R2:**

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

**Rationale for R3:**

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

**Rationale for R4:**

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the provisions outlined in Requirement R4 below. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

## Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

### Description of Current Draft

This is the first posting of the proposed revised standard. This proposed draft standard will be posted for a 45-day comment period and 10-day initial ballot.

| Completed Actions | Date |
|---|---|
| Standards Committee approved SAR for posting | April 15, 2015 |
| SAR posted for a 30-day informal comment period | April 16, 2015 |

| Anticipated Actions | Date |
|---|---|
| 45-day formal comment period with initial ballot | August/September 2015 |
| Final ballot | October 2015 |
| NERC Board adoption | November 2015 |

## New or Modified Terms Used in NERC Reliability Standards

This section includes all new or modified terms used in the proposed standard that will be included in the *Glossary of Terms Used in NERC Reliability Standards* upon applicable regulatory approval. Terms used in the proposed standard that are already defined and are not being modified can be found in the *Glossary of Terms Used in NERC Reliability Standards*. The new or revised terms listed below will be presented for approval with the proposed standard.

**Term:** None

## A. Introduction

1. **Title: Demand and Energy Data**

2. **Number: MOD-031-2~~1~~**

3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

4. **Applicability:**

   **4.1. Functional Entities:**

   **4.1.1** Planning Authority and Planning Coordinator (hereafter collectively referred to as the "Planning Coordinator")

   This proposed standard combines "Planning Authority" with "Planning Coordinator" in the list of applicable functional entities. The NERC Functional Model lists "Planning Coordinator" while the registration criteria list "Planning Authority," and they are not yet synchronized. Until that occurs, the proposed standard applies to both "Planning Authority" and "Planning Coordinator."

   **4.1.2** Transmission Planner

   **4.1.3** Balancing Authority

   **4.1.4** Resource Planner

   **4.1.5** Load-Serving Entity

   **4.1.6** Distribution Provider

5. **Effective Date**

   **5.1.** See the MOD-031-2 Implementation Plan.~~MOD-031-1 shall become effective on the first day of the first calendar quarter that is twelve months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twelve months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.~~

6. **Background:**

   To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

   The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning

Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## B. Requirements and Measures

**R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data ("Applicable Entities").

**1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).

**1.3.** A request to provide any or all of the following actual data, as necessary:

**1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.

**1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.

**1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.

**1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.

**1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any, activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

**1.4.** A request to provide any or all of the following forecast data, as necessary:

**1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.

**1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.

**1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.

**1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.

**1.4.5.** Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.

**1.5.** A request to provide any or all of the following summary explanations, as necessary,:

**1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.

**1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.

**1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.

**1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations

(e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.

**R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.

**R3.** The Planning Coordinator or the Balancing Authority shall provide the data listed~~collected~~ under Requirement R1 Parts 1.3 through 1.5 for their area~~R2~~ to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**Rationale for R4:** This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requiement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

**R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; and
- shall not be required to provide any requested data that, if provided, would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements; and
- shall not be required to alter the format in which it maintains or uses the data.

**4.1.** If the Applicable Entity does not provide data requested under this requirement because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the requesting entity specifying the data that is not being provided and on what basis.

**M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

#### 1.4. Additional Compliance Information

None

## Table of Compliance Elements

| R # | Time Horizon | VRF | Violation Severity Levels | | | |
|---|---|---|---|---|---|---|
| | | | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1 | Long-term Planning | Medium | N/A | N/A | N/A | The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data. |
| R2 | Long-term Planning | Medium | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5 |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. |
| R3 | Long-term Planning | Medium | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data collected under Requirement R2 prior to 91 |

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|---|---|---|---|---|---|---|
| | | | did so after 75 days from the date of request but prior to 81 days from the date of the request. | did so after 80 days from the date of request but prior to 86 days from the date of the request. | did so after 85 days from the date of request but prior to 91 days from the date of the request. | days or more from the date of the request. |
| R4 | Long-term Planning | Medium | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written resquest. | The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written resquest. |

## D. Regional Variances

None.

## E. Interpretations

None.

## F. Associated Documents

None.

## Version History

| Version | Date | Action | Change Tracking |
|---|---|---|---|
| 1 | May 6, 2014 | Adopted by the NERC Board of Trustees. | |
| 1 | February 19, 2015 | FERC order approving MOD-031-1 | |
| | | | |

## Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

**Rationale for R1:**

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

**Rationale for R2:**

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

**Rationale for R3:**

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

**Rationale for R4:**

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the provisions outlined in Requirement R4 below. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

# Implementation Plan

## Project 2010-04.1 Demand and Energy Data

**Implementation Plan for MOD-031-2 – Demand and Energy Data**

***Approvals Required***
MOD-031-2 – Demand and Energy Data

***Prerequisite Approvals***
There are no other standards that must receive approval prior to the approval of this standard.

***Revisions to Glossary Terms***

**N/A**

***Applicable Entities***

Planning Coordinator and Planning Authority

Transmission Planner

Resource Planner

Balancing Authority

Load-Serving Entity

Distribution Provider

***Applicable Facilities***
N/A

***Conforming Changes to Other Standards***
None

***Effective Dates***

MOD-031-2 shall become effective as follows:

The later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is

required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

***Justification***

The six-month implementation period will provide sufficient time for the applicable entities to develop the necessary process to implement this standard.

***Retirements***

MOD-031-1 shall be retired at 11:59:59 p.m. of the day immediately prior to the effective date of MOD-031-2 in the particular jurisdiction in which the new standard is becoming effective.

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# Unofficial Comment Form

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2

**DO NOT** use this form for submitting comments. Use the electronic form to submit comments on the proposed standard **MOD-031-2 – Demand and Energy Data** to address FERC Order No. 804 directives. Comments must be submitted by **8 p.m. Eastern, Friday, September 18, 2015**.

Documents and information about this project are available on the project page. If you have questions, contact Senior Standards Developer, Darrel Richardson (via email), or at (609) 613-1848.

### Background Information

The collection of demand projections requires coordination and collaboration between Planning Authorities (also referred to as "Planning Coordinators"), Transmission and Resource Planners, and Load-Serving Entities. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – will enhance the reliability of the BPS. Collection of actual demand and demand-side management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices. This project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information.

### Questions

1. The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.

   Yes:

   No:

   Comments:

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# Standards Announcement Reminder

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2

**Initial Ballot and Non-binding Poll Open through September 18, 2015**

**Now Available**

An initial ballot for draft one of **MOD-031-2 – Demand and Energy Data** and a non-binding poll of the associated Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) are open through **8 p.m. Eastern, Friday, September 18, 2015.**

### Balloting

Members of the ballot pools associated with this project may log in and submit their votes for the standard and associated VRFs and VSLs by clicking here.

*If you are having difficulty accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out, contact NERC IT support directly at ERO helpdesk@nerc.net (Monday – Friday, 8 a.m. - 8 p.m. Eastern).*

### Next Steps

The ballot results will be announced and posted on the project page. The drafting team will consider all comments received during the formal comment period and, if needed, make revisions to the standard and post it for an additional ballot. If the comments do not show the need for significant revisions, the standard will proceed to a final ballot.

### Standards Development Process

For more information on the Standards Development Process, please refer to the Standard Processes Manual.

For more information or assistance, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

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404-446-2560 | www.nerc.com

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# Standards Announcement

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2

**Formal Comment Period Open through September 18, 2015**
**Ballot Pools Forming through August 31, 2015**

**Now Available**

A 45-day formal comment period for draft one of **MOD-031-2 – Demand and Energy Data** is open through **8 p.m. Eastern, Friday, September 18, 2015.**

### Commenting

Use the electronic form to submit comments on the standard. If you experience any difficulties in using the electronic form, contact Wendy Muller. An unofficial Word version of the comment form is posted on the project page.

### Join the Ballot Pools

Ballot pools are being formed through **8 p.m. Eastern, Monday, August 31, 2015**. Registered Ballot Body members may join the ballot pools here.

### Next Steps

An initial ballot for the standard and a non-binding poll of the associated Violation Risk Factors and Violation Severity Levels will be conducted **September 9-18, 2015.**

### Standards Development Process

For more information on the Standards Development Process, please refer to the Standard Processes Manual.

For more information or assistance, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

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# Standards Announcement

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2

**RSAW Posted for Industry Comment through Friday, September 18, 2015**

**Now Available**

The draft RSAW for **MOD-031-2 – Demand and Energy Data** is posted on the project page for industry comment through **8 p.m. Eastern, Friday, September 18, 2015**. Submit feedback regarding the draft RSAW to RSAWfeedback@nerc.net**.**

For more information or assistance, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

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# Standards Announcement

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2

### Initial Ballot and Non-binding Poll Results

**Now Available**

A formal comment period and initial ballot for draft one of **MOD-031-2 – Demand and Energy Data** as well as a non-binding poll of the associated Violation Risk Factors and Violation Severity Levels concluded **8 p.m. Eastern, Friday, September 18, 2015.**

The initial ballot received sufficient affirmative votes for approval. Voting statistics are listed below, and the Ballot Results page provides detailed results for the ballot and non-binding poll.

| Ballot | Non-binding Poll |
|---|---|
| Quorum /Approval | Quorum/Supportive Opinions |
| 85.57% / 87.36% | 82.90% / 89.20% |

### Next Steps

The drafting team will consider all comments received during the formal comment period and determine the next steps for the project.

### Standards Development Process

For more information on the Standards Development Process, refer to the Standard Processes Manual.

For more information or assistance, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

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# *BALLOT RESULTS*

Survey: View Survey Results (/SurveyResults/Index/28)
**Ballot Name:** 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 IN 1 ST
**Voting Start Date:** 9/9/2015 12:01:00 AM
**Voting End Date:** 9/18/2015 8:00:00 PM
**Ballot Type:** ST
**Ballot Activity:** IN
**Ballot Series:** 1
**Total # Votes:** 255
**Total Ballot Pool:** 298
**Quorum:** 85.57
**Weighted Segment Value:** 87.36

| Segment | Ballot Pool | Segment Weight | Affirmative Votes | Affirmative Fraction | Negative Votes w/ Comment | Negative Fraction w/ Comment | Negative Votes w/o Comment | Abstain | No Vote |
|---|---|---|---|---|---|---|---|---|---|
| Segment: 1 | 76 | 1 | 53 | 0.914 | 5 | 0.086 | 0 | 9 | 9 |
| Segment: 2 | 9 | 0.6 | 5 | 0.5 | 1 | 0.1 | 0 | 1 | 2 |
| Segment: 3 | 68 | 1 | 47 | 0.87 | 7 | 0.13 | 0 | 4 | 10 |
| Segment: 4 | 26 | 1 | 15 | 0.714 | 6 | 0.286 | 0 | 1 | 4 |
| Segment: 5 | 67 | 1 | 45 | 0.938 | 3 | 0.062 | 0 | 4 | 15 |
| Segment: 6 | 41 | 1 | 33 | 0.917 | 3 | 0.083 | 0 | 2 | 3 |
| Segment: 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Segment: 8 | 1 | 0.1 | 1 | 0.1 | 0 | 0 | 0 | 0 | 0 |
| Segment: | 2 | 0.2 | 1 | 0.1 | 1 | 0.1 | 0 | 0 | 0 |

© 2015 - NERC Ver 1.3.5.11 Machine Name: ERODVSBSWB02

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|---|---|---|---|---|---|---|---|---|---|
| 9 | | | | | | | | | |
| Segment: 10 | 8 | 0.8 | 8 | 0.8 | 0 | 0 | 0 | 0 | 0 |
| Totals: | 298 | 6.7 | 208 | 5.853 | 26 | 0.847 | 0 | 21 | 43 |

## *BALLOT POOL MEMBERS*

Show All entries Search: Search

| Segment | Organization | Voter | Designated Proxy | Ballot | NERC Memo |
|---|---|---|---|---|---|
| 1 | Ameren - Ameren Services | Eric Scott | | None | N/A |
| 1 | American Transmission Company, LLC | Andrew Pusztai | | Abstain | N/A |
| 1 | APS - Arizona Public Service Co. | Michelle Amarantos | | Affirmative | N/A |
| 1 | Associated Electric Cooperative, Inc. | Phil Hart | | Affirmative | N/A |
| 1 | Avista - Avista Corporation | Bryan Cox | Rich Hydzik | Affirmative | N/A |
| 1 | Balancing Authority of Northern California | Kevin Smith | Joe Tarantino | Affirmative | N/A |
| 1 | BC Hydro and Power Authority | Patricia Robertson | | Abstain | N/A |
| 1 | Beaches Energy Services | Don Cuevas | | Negative | Third-Party Comments |
| 1 | Berkshire Hathaway Energy - MidAmerican Energy Co. | Terry Harbour | | Affirmative | N/A |

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|---|---|---|---|---|---|
| 1 | Black Hills Corporation | Wes Wingen | | Abstain | N/A |
| 1 | Bonneville Power Administration | Donald Watkins | | Affirmative | N/A |
| 1 | Brazos Electric Power Cooperative, Inc. | Tony Kroskey | | None | N/A |
| 1 | Bryan Texas Utilities | John Fontenot | | Affirmative | N/A |
| 1 | CenterPoint Energy Houston Electric, LLC | John Brockhan | | Affirmative | N/A |
| 1 | Central Electric Power Cooperative (Missouri) | Michael Bax | | None | N/A |
| 1 | Cleco Corporation | John Lindsey | Louis Guidry | Affirmative | N/A |
| 1 | Con Ed - Consolidated Edison Co. of New York | Chris de Graffenried | | Affirmative | N/A |
| 1 | Dairyland Power Cooperative | Robert Roddy | | Affirmative | N/A |
| 1 | Dominion - Dominion Virginia Power | Larry Nash | | Negative | Comments Submitted |
| 1 | Duke Energy | Doug Hils | | Affirmative | N/A |
| 1 | Edison International - Southern California Edison Company | Steven Mavis | | Affirmative | N/A |
| 1 | Entergy - Entergy Services, Inc. | Oliver Burke | | Affirmative | N/A |
| 1 | Exelon | Chris Scanlon | | Affirmative | N/A |
| 1 | FirstEnergy - FirstEnergy Corporation | William Smith | | Affirmative | N/A |
| 1 | Georgia Transmission Corporation | Jason Snodgrass | | Affirmative | N/A |
| 1 | Great Plains Energy - Kansas City Power and Light Co. | James McBee | Douglas Webb | Affirmative | N/A |

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|---|---|---|---|---|---|
| 1 | Great River Energy | Gordon Pietsch | | Affirmative | N/A |
| 1 | Hoosier Energy Rural Electric Cooperative, Inc. | Bob Solomon | | None | N/A |
| 1 | Hydro One Networks, Inc. | Payam Farahbakhsh | | Abstain | N/A |
| 1 | Hydro-Qu?bec TransEnergie | Martin Boisvert | | Affirmative | N/A |
| 1 | IDACORP - Idaho Power Company | Molly Devine | | Affirmative | N/A |
| 1 | International Transmission Company Holdings Corporation | Michael Moltane | Meghan Ferguson | Abstain | N/A |
| 1 | KAMO Electric Cooperative | Walter Kenyon | | Affirmative | N/A |
| 1 | Los Angeles Department of Water and Power | faranak sarbaz | | Affirmative | N/A |
| 1 | Lower Colorado River Authority | Teresa Cantwell | | Abstain | N/A |
| 1 | M and A Electric Power Cooperative | William Price | | Affirmative | N/A |
| 1 | Manitoba Hydro | Mike Smith | | Affirmative | N/A |
| 1 | MEAG Power | David Weekley | Scott Miller | None | N/A |
| 1 | Muscatine Power and Water | Andy Kurriger | | Affirmative | N/A |
| 1 | National Grid USA | Michael Jones | | Affirmative | N/A |
| 1 | NB Power Corporation | Alan MacNaughton | | Affirmative | N/A |
| 1 | Nebraska Public Power District | Jamison Cawley | | Affirmative | N/A |
| 1 | New York Power Authority | Salvatore Spagnolo | | None | N/A |
| 1 | NextEra Energy - Florida Power and Light Co. | Mike ONeil | | Affirmative | N/A |

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|---|---|---|---|---|---|
| 1 | NiSource - Northern Indiana Public Service Co. | Julaine Dyke | | Affirmative | N/A |
| 1 | Northeast Missouri Electric Power Cooperative | Kevin White | | Affirmative | N/A |
| 1 | NorthWestern Energy | Belinda Tierney | | None | N/A |
| 1 | OGE Energy - Oklahoma Gas and Electric Co. | Terri Pyle | | Negative | Third-Party Comments |
| 1 | Oncor Electric Delivery | Rod Kinard | Gul Khan | Affirmative | N/A |
| 1 | OTP - Otter Tail Power Company | Charles Wicklund | | Affirmative | N/A |
| 1 | Peak Reliability | Jared Shakespeare | | Abstain | N/A |
| 1 | PHI - Potomac Electric Power Co. | David Thorne | | Affirmative | N/A |
| 1 | Platte River Power Authority | John Collins | | Affirmative | N/A |
| 1 | PNM Resources - Public Service Company of New Mexico | Laurie Williams | | None | N/A |
| 1 | PPL Electric Utilities Corporation | Brenda Truhe | | Abstain | N/A |
| 1 | PSEG - Public Service Electric and Gas Co. | Joseph Smith | | Affirmative | N/A |
| 1 | Public Utility District No. 1 of Snohomish County | Long Duong | | Affirmative | N/A |
| 1 | Public Utility District No. 2 of Grant County, Washington | Michiko Sell | | Negative | Comments Submitted |
| 1 | Sacramento Municipal Utility District | Tim Kelley | Joe Tarantino | Affirmative | N/A |
| 1 | Salt River Project | Steven Cobb | | Affirmative | N/A |

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|---|---|---|---|---|---|
| 1 | Santee Cooper | Shawn Abrams | | Affirmative | N/A |
| 1 | SCANA - South Carolina Electric and Gas Co. | Tom Hanzlik | | Abstain | N/A |
| 1 | Seattle City Light | Pawel Krupa | | Affirmative | N/A |
| 1 | Seminole Electric Cooperative, Inc. | Mark Churilla | Bret Galbraith | Affirmative | N/A |
| 1 | Sho-Me Power Electric Cooperative | Denise Stevens | | Affirmative | N/A |
| 1 | Southern Company - Southern Company Services, Inc. | Robert A. Schaffeld | | Affirmative | N/A |
| 1 | Southwest Transmission Cooperative, Inc. | John Shaver | | Negative | Third-Party Comments |
| 1 | Tacoma Public Utilities (Tacoma, WA) | John Merrell | | Affirmative | N/A |
| 1 | Tallahassee Electric (City of Tallahassee, FL) | Scott Langston | | Affirmative | N/A |
| 1 | Tennessee Valley Authority | Howell Scott | | Affirmative | N/A |
| 1 | Tri-State G and T Association, Inc. | Tracy Sliman | | Affirmative | N/A |
| 1 | Unisource - Tucson Electric Power Co. | John Tolo | | Affirmative | N/A |
| 1 | United Illuminating Co. | Jonathan Appelbaum | | Affirmative | N/A |
| 1 | Westar Energy | Kevin Giles | | Affirmative | N/A |
| 1 | Western Area Power Administration | Steve Johnson | | None | N/A |
| 1 | Xcel Energy, Inc. | Dean Schiro | | Affirmative | N/A |
| 2 | BC Hydro and Power Authority | Venkataramakrishnan Vinnakota | | Abstain | N/A |
| 2 | California ISO | Richard Vine | | Affirmative | N/A |

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|---|---|---|---|---|---|
| 2 | Electric Reliability Council of Texas, Inc. | christina bigelow | | Negative | Comments Submitted |
| 2 | Herb Schrayshuen | Herb Schrayshuen | | Affirmative | N/A |
| 2 | Independent Electricity System Operator | Leonard Kula | | Affirmative | N/A |
| 2 | ISO New England, Inc. | Michael Puscas | John Pearson | Affirmative | N/A |
| 2 | Midcontinent ISO, Inc. | Terry BIlke | | None | N/A |
| 2 | New York Independent System Operator | Gregory Campoli | | None | N/A |
| 2 | PJM Interconnection, L.L.C. | Mark Holman | | Affirmative | N/A |
| 3 | Ameren - Ameren Services | David Jendras | | None | N/A |
| 3 | Anaheim Public Utilities Dept. | Dennis Schmidt | | Affirmative | N/A |
| 3 | APS - Arizona Public Service Co. | Jeri Freimuth | | Affirmative | N/A |
| 3 | Associated Electric Cooperative, Inc. | Todd Bennett | | Affirmative | N/A |
| 3 | Austin Energy | Lisa Martin | | Affirmative | N/A |
| 3 | Avista - Avista Corporation | Scott Kinney | | Abstain | N/A |
| 3 | Basin Electric Power Cooperative | Jeremy Voll | | Affirmative | N/A |
| 3 | BC Hydro and Power Authority | Pat Harrington | | None | N/A |
| 3 | Beaches Energy Services | Steven Lancaster | | Negative | Third-Party Comments |
| 3 | Berkshire Hathaway Energy - MidAmerican Energy Co. | Thomas Mielnik | Darnez Gresham | Affirmative | N/A |
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|---|---|---|---|---|---|
| 3 | Bonneville Power Administration | Rebecca Berdahl | | Affirmative | N/A |
| 3 | Central Electric Power Cooperative (Missouri) | Adam Weber | | Affirmative | N/A |
| 3 | City of Green Cove Springs | Mark Schultz | | Negative | Third-Party Comments |
| 3 | City of Leesburg | Chris Adkins | | Negative | Third-Party Comments |
| 3 | Clark Public Utilities | Jack Stamper | | Affirmative | N/A |
| 3 | CMS Energy - Consumers Energy Company | Karl Blaszkowski | | Affirmative | N/A |
| 3 | Colorado Springs Utilities | Charles Morgan | | Affirmative | N/A |
| 3 | Con Ed - Consolidated Edison Co. of New York | Peter Yost | | Affirmative | N/A |
| 3 | Dominion - Dominion Resources, Inc. | Connie Lowe | | Negative | Comments Submitted |
| 3 | DTE Energy - Detroit Edison Company | Kent Kujala | | Affirmative | N/A |
| 3 | Duke Energy | Lee Schuster | | Affirmative | N/A |
| 3 | Edison International - Southern California Edison Company | Romel Aquino | | Affirmative | N/A |
| 3 | Exelon | John Bee | | Affirmative | N/A |
| 3 | FirstEnergy - FirstEnergy Corporation | Theresa Ciancio | | Affirmative | N/A |
| 3 | Florida Municipal Power Agency | Joe McKinney | | Negative | Third-Party Comments |
| 3 | Georgia System Operations Corporation | Scott McGough | | Affirmative | N/A |
| 3 | Grand River Dam Authority | Jeff Wells | | Abstain | N/A |
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|---|---|---|---|---|---|
| 3 | Great Plains Energy - Kansas City Power and Light Co. | Jessica Tucker | Douglas Webb | Affirmative | N/A |
| 3 | Great River Energy | Brian Glover | | Affirmative | N/A |
| 3 | Hydro One Networks, Inc. | Paul Malozewski | Oshani Pathirane | Abstain | N/A |
| 3 | JEA | Garry Baker | | None | N/A |
| 3 | KAMO Electric Cooperative | Ted Hilmes | | Affirmative | N/A |
| 3 | Lakeland Electric | Mace Hunter | | Negative | Third-Party Comments |
| 3 | Lincoln Electric System | Jason Fortik | | Affirmative | N/A |
| 3 | Los Angeles Department of Water and Power | Mike Anctil | | Affirmative | N/A |
| 3 | M and A Electric Power Cooperative | Stephen Pogue | | Affirmative | N/A |
| 3 | Manitoba Hydro | Karim Abdel-Hadi | | Affirmative | N/A |
| 3 | MEAG Power | Roger Brand | Scott Miller | None | N/A |
| 3 | Muscatine Power and Water | Seth Shoemaker | | Affirmative | N/A |
| 3 | National Grid USA | Brian Shanahan | | Affirmative | N/A |
| 3 | Nebraska Public Power District | Tony Eddleman | | Affirmative | N/A |
| 3 | New York Power Authority | David Rivera | | Affirmative | N/A |
| 3 | NiSource - Northern Indiana Public Service Co. | Ramon Barany | | None | N/A |
| 3 | Northeast Missouri Electric Power Cooperative | Skyler Wiegmann | | Affirmative | N/A |
| 3 | OGE Energy - Oklahoma Gas and Electric Co. | Donald Hargrove | | Negative | Third-Party Comments |
| 3 | PHI - Potomac | Mark Yerger | | Affirmative | N/A |

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|---|---|---|---|---|---|
| | Electric Power Co. | | | | |
| 3 | PNM Resources | Michael Mertz | | None | N/A |
| 3 | PPL - Louisville Gas and Electric Co. | Charles Freibert | | Abstain | N/A |
| 3 | PSEG - Public Service Electric and Gas Co. | Jeffrey Mueller | | Affirmative | N/A |
| 3 | Public Utility District No. 1 of Okanogan County | Dale Dunckel | | None | N/A |
| 3 | Puget Sound Energy, Inc. | Andrea Basinski | | None | N/A |
| 3 | Sacramento Municipal Utility District | Rachel Moore | Joe Tarantino | Affirmative | N/A |
| 3 | Salt River Project | John Coggins | | Affirmative | N/A |
| 3 | Santee Cooper | James Poston | | Affirmative | N/A |
| 3 | SCANA - South Carolina Electric and Gas Co. | Clay Young | | None | N/A |
| 3 | Seattle City Light | Dana Wheelock | | Affirmative | N/A |
| 3 | Seminole Electric Cooperative, Inc. | James Frauen | | Affirmative | N/A |
| 3 | Sho-Me Power Electric Cooperative | Jeff Neas | | Affirmative | N/A |
| 3 | Snohomish County PUD No. 1 | Mark Oens | | Affirmative | N/A |
| 3 | Southern Company - Alabama Power Company | R. Scott Moore | | Affirmative | N/A |
| 3 | Tacoma Public Utilities (Tacoma, WA) | Marc Donaldson | | Affirmative | N/A |
| 3 | Tallahassee Electric (City of Tallahassee, FL) | John Williams | | Affirmative | N/A |
| 3 | TECO - Tampa | Ronald Donahey | | None | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | Electric Co. | | | | |
| 3 | Tennessee Valley Authority | Ian Grant | | Affirmative | N/A |
| 3 | Tri-State G and T Association, Inc. | Janelle Marriott Gill | | Affirmative | N/A |
| 3 | WEC Energy Group, Inc. | James Keller | | Affirmative | N/A |
| 3 | Westar Energy | Bo Jones | | Affirmative | N/A |
| 3 | Xcel Energy, Inc. | Michael Ibold | | Affirmative | N/A |
| 4 | Alliant Energy Corporation Services, Inc. | Kenneth Goldsmith | | Affirmative | N/A |
| 4 | Austin Energy | Tina Garvey | | Affirmative | N/A |
| 4 | Blue Ridge Power Agency | Duane Dahlquist | | None | N/A |
| 4 | City of Clewiston | Lynne Mila | | Negative | Third-Party Comments |
| 4 | City of New Smyrna Beach Utilities Commission | Tim Beyrle | | Negative | Third-Party Comments |
| 4 | City of Redding | Nick Zettel | Bill Hughes | Affirmative | N/A |
| 4 | CMS Energy - Consumers Energy Company | Julie Hegedus | | None | N/A |
| 4 | DTE Energy - Detroit Edison Company | Daniel Herring | | Affirmative | N/A |
| 4 | FirstEnergy - Ohio Edison Company | Doug Hohlbaugh | | Affirmative | N/A |
| 4 | Florida Municipal Power Agency | Carol Chinn | | Negative | Third-Party Comments |
| 4 | Georgia System Operations Corporation | Guy Andrews | | Affirmative | N/A |
| 4 | Illinois Municipal Electric Agency | Bob Thomas | | Negative | Comments Submitted |
| 4 | Keys Energy | Stanley Rzad | | Negative | Third-Party |

| | | | | | |
|---|---|---|---|---|---|
| | Services | | | | Comments |
| 4 | MGE Energy - Madison Gas and Electric Co. | Joseph DePoorter | | Affirmative | N/A |
| 4 | Modesto Irrigation District | Spencer Tacke | | None | N/A |
| 4 | Municipal Energy Agency of Nebraska | Robin Spady | | Abstain | N/A |
| 4 | Oklahoma Municipal Power Authority | Ashley Stringer | | Affirmative | N/A |
| 4 | Public Utility District No. 1 of Snohomish County | John Martinsen | | Affirmative | N/A |
| 4 | Public Utility District No. 2 of Grant County, Washington | Yvonne McMackin | | Negative | Comments Submitted |
| 4 | Sacramento Municipal Utility District | Michael Ramirez | Joe Tarantino | Affirmative | N/A |
| 4 | Seattle City Light | Hao Li | | Affirmative | N/A |
| 4 | Seminole Electric Cooperative, Inc. | Michael Ward | | Affirmative | N/A |
| 4 | South Mississippi Electric Power Association | Steve McElhaney | | None | N/A |
| 4 | Tacoma Public Utilities (Tacoma, WA) | Hien Ho | | Affirmative | N/A |
| 4 | Utility Services, Inc. | Brian Evans-Mongeon | | Affirmative | N/A |
| 4 | WEC Energy Group, Inc. | Anthony Jankowski | | Affirmative | N/A |
| 5 | AEP | Thomas Foltz | | Affirmative | N/A |
| 5 | Ameren - Ameren Missouri | Sam Dwyer | | None | N/A |
| 5 | APS - Arizona Public Service Co. | Stephanie Little | | Affirmative | N/A |
| 5 | Austin Energy | Jeanie Doty | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 5 | Avista - Avista Corporation | Steve Wenke | | None | N/A |
| 5 | Basin Electric Power Cooperative | Mike Kraft | | None | N/A |
| 5 | BC Hydro and Power Authority | Clement Ma | | None | N/A |
| 5 | Boise-Kuna Irrigation District - Lucky Peak Power Plant Project | Mike Kukla | | Affirmative | N/A |
| 5 | Bonneville Power Administration | Francis Halpin | | Affirmative | N/A |
| 5 | Brazos Electric Power Cooperative, Inc. | Shari Heino | | Affirmative | N/A |
| 5 | Calpine Corporation | Hamid Zakery | | Affirmative | N/A |
| 5 | Choctaw Generation Limited Partnership, LLLP | Rob Watson | | Affirmative | N/A |
| 5 | City and County of San Francisco | Daniel Mason | | Affirmative | N/A |
| 5 | City of Independence, Power and Light Department | Jim Nail | | Affirmative | N/A |
| 5 | City of Redding | Paul Cummings | Bill Hughes | Affirmative | N/A |
| 5 | Cleco Corporation | Stephanie Huffman | Louis Guidry | Affirmative | N/A |
| 5 | CMS Energy - Consumers Energy Company | David Greyerbiehl | | Affirmative | N/A |
| 5 | Con Ed - Consolidated Edison Co. of New York | Brian O'Boyle | | Affirmative | N/A |
| 5 | Dairyland Power Cooperative | Tommy Drea | | Affirmative | N/A |
| 5 | Dominion - Dominion Resources, Inc. | Randi Heise | | Negative | Comments Submitted |
| 5 | DTE Energy - Detroit Edison Company | Jeffrey DePriest | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 5 | Duke Energy | Dale Goodwine | | Affirmative | N/A |
| 5 | Edison International - Southern California Edison Company | Michael McSpadden | | Affirmative | N/A |
| 5 | Entergy - Entergy Services, Inc. | Tracey Stubbs | | None | N/A |
| 5 | Exelon | Vince Catania | | Affirmative | N/A |
| 5 | FirstEnergy - FirstEnergy Solutions | Robert Loy | | None | N/A |
| 5 | Florida Municipal Power Agency | David Schumann | | Negative | Third-Party Comments |
| 5 | Great Plains Energy - Kansas City Power and Light Co. | Harold Wyble | Douglas Webb | Affirmative | N/A |
| 5 | Great River Energy | Preston Walsh | | Affirmative | N/A |
| 5 | Hydro-Qu?bec Production | Roger Dufresne | | Abstain | N/A |
| 5 | JEA | John Babik | | Affirmative | N/A |
| 5 | Lakeland Electric | Jim Howard | | None | N/A |
| 5 | Lincoln Electric System | Kayleigh Wilkerson | | Affirmative | N/A |
| 5 | Los Angeles Department of Water and Power | Kenneth Silver | | None | N/A |
| 5 | Lower Colorado River Authority | Dixie Wells | | Abstain | N/A |
| 5 | Luminant - Luminant Generation Company LLC | Rick Terrill | | None | N/A |
| 5 | Manitoba Hydro | Yuguang Xiao | | Affirmative | N/A |
| 5 | Massachusetts Municipal Wholesale Electric Company | David Gordon | | Abstain | N/A |
| 5 | MEAG Power | Steven Grego | Scott Miller | None | N/A |
| 5 | Muscatine Power and Water | Mike Avesing | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 5 | NB Power Corporation | Rob Vance | | Affirmative | N/A |
| 5 | Nebraska Public Power District | Don Schmit | | Affirmative | N/A |
| 5 | New York Power Authority | Wayne Sipperly | | Affirmative | N/A |
| 5 | NextEra Energy | Allen Schriver | | Affirmative | N/A |
| 5 | NiSource - Northern Indiana Public Service Co. | Michael Melvin | | Affirmative | N/A |
| 5 | OGE Energy - Oklahoma Gas and Electric Co. | Leo Staples | | Negative | Third-Party Comments |
| 5 | Oglethorpe Power Corporation | Bernard Johnson | | None | N/A |
| 5 | Omaha Public Power District | Mahmood Safi | | Affirmative | N/A |
| 5 | OTP - Otter Tail Power Company | Cathy Fogale | | Affirmative | N/A |
| 5 | Pacific Gas and Electric Company | Alex Chua | | None | N/A |
| 5 | Platte River Power Authority | Tyson Archie | | Affirmative | N/A |
| 5 | PPL Electric Utilities Corporation | Dan Wilson | | Abstain | N/A |
| 5 | PSEG - PSEG Fossil LLC | Tim Kucey | | Affirmative | N/A |
| 5 | Public Utility District No. 1 of Snohomish County | Sam Nietfeld | | Affirmative | N/A |
| 5 | Public Utility District No. 2 of Grant County, Washington | Alex Ybarra | | Affirmative | N/A |
| 5 | Puget Sound Energy, Inc. | Lynda Kupfer | | None | N/A |
| 5 | Sacramento Municipal Utility District | Susan Gill-Zobitz | Joe Tarantino | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 5 | Salt River Project | Kevin Nielsen | | Affirmative | N/A |
| 5 | SCANA - South Carolina Electric and Gas Co. | Edward Magic | | None | N/A |
| 5 | Seattle City Light | Mike Haynes | | Affirmative | N/A |
| 5 | Southern Company - Southern Company Generation | William D. Shultz | | Affirmative | N/A |
| 5 | Tacoma Public Utilities (Tacoma, WA) | Chris Mattson | | None | N/A |
| 5 | Tallahassee Electric (City of Tallahassee, FL) | Karen Webb | | Affirmative | N/A |
| 5 | Tennessee Valley Authority | Brandy Spraker | | Affirmative | N/A |
| 5 | WEC Energy Group, Inc. | Linda Horn | | Affirmative | N/A |
| 5 | Westar Energy | stephanie johnson | | Affirmative | N/A |
| 5 | Xcel Energy, Inc. | Mark Castagneri | | Affirmative | N/A |
| 6 | Ameren - Ameren Services | Robert Quinlivan | | None | N/A |
| 6 | APS - Arizona Public Service Co. | Bobbi Welch | | Affirmative | N/A |
| 6 | Associated Electric Cooperative, Inc. | Brian Ackermann | | Affirmative | N/A |
| 6 | Austin Energy | Andrew Gallo | | Affirmative | N/A |
| 6 | Berkshire Hathaway - PacifiCorp | Sandra Shaffer | | Affirmative | N/A |
| 6 | Bonneville Power Administration | Alex Spain | | Affirmative | N/A |
| 6 | City of Redding | Marvin Briggs | Bill Hughes | Affirmative | N/A |
| 6 | Cleco Corporation | Robert Hirchak | Louis Guidry | Affirmative | N/A |
| 6 | Colorado Springs Utilities | Shannon Fair | | Affirmative | N/A |
| | | | | | |

| | | | | | |
|---|---|---|---|---|---|
| 6 | Con Ed - Consolidated Edison Co. of New York | Robert Winston | | Affirmative | N/A |
| 6 | Dominion - Dominion Resources, Inc. | Louis Slade | | Negative | Comments Submitted |
| 6 | Duke Energy | Greg Cecil | | Affirmative | N/A |
| 6 | Exelon | Dave Carlson | | Affirmative | N/A |
| 6 | FirstEnergy - FirstEnergy Solutions | Ann Ivanc | Richard Hoag | Affirmative | N/A |
| 6 | Florida Municipal Power Agency | Richard Montgomery | | Negative | Third-Party Comments |
| 6 | Florida Municipal Power Pool | Tom Reedy | | Negative | Comments Submitted |
| 6 | Great Plains Energy - Kansas City Power and Light Co. | Chris Bridges | Douglas Webb | Affirmative | N/A |
| 6 | Great River Energy | Donna Stephenson | Michael Brytowski | Affirmative | N/A |
| 6 | Lower Colorado River Authority | Michael Shaw | | Abstain | N/A |
| 6 | Manitoba Hydro | Blair Mukanik | | Affirmative | N/A |
| 6 | Muscatine Power and Water | Ryan Streck | | Affirmative | N/A |
| 6 | New York Power Authority | Shivaz Chopra | | Affirmative | N/A |
| 6 | NextEra Energy - Florida Power and Light Co. | Silvia Mitchell | | Affirmative | N/A |
| 6 | NiSource - Northern Indiana Public Service Co. | Joe O'Brien | | Affirmative | N/A |
| 6 | OGE Energy - Oklahoma Gas and Electric Co. | Jerry Nottnagel | | None | N/A |
| 6 | Oglethorpe Power Corporation | Donna Johnson | | Affirmative | N/A |
| 6 | Platte River Power | Carol Ballantine | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | Authority | | | | |
| 6 | PPL - Louisville Gas and Electric Co. | OELKER LINN | | Abstain | N/A |
| 6 | Sacramento Municipal Utility District | Diane Clark | Joe Tarantino | Affirmative | N/A |
| 6 | Salt River Project | William Abraham | Chris Janick | Affirmative | N/A |
| 6 | Santee Cooper | Michael Brown | | Affirmative | N/A |
| 6 | Seattle City Light | Charles Freeman | | Affirmative | N/A |
| 6 | Seminole Electric Cooperative, Inc. | Trudy Novak | | Affirmative | N/A |
| 6 | Snohomish County PUD No. 1 | Kenn Backholm | | Affirmative | N/A |
| 6 | Southern Company - Southern Company Generation and Energy Marketing | John J. Ciza | | Affirmative | N/A |
| 6 | Tacoma Public Utilities (Tacoma, WA) | Rick Applegate | | Affirmative | N/A |
| 6 | Talen Energy Marketing, LLC | Elizabeth Davis | | Affirmative | N/A |
| 6 | Tennessee Valley Authority | Marjorie Parsons | | Affirmative | N/A |
| 6 | WEC Energy Group, Inc. | David Hathaway | | None | N/A |
| 6 | Westar Energy | Tiffany Lake | | Affirmative | N/A |
| 6 | Xcel Energy, Inc. | Peter Colussy | | Affirmative | N/A |
| 8 | David Kiguel | David Kiguel | | Affirmative | N/A |
| 9 | City of Vero Beach | Ginny Beigel | | Negative | Third-Party Comments |
| 9 | Commonwealth of Massachusetts Department of Public Utilities | Donald Nelson | | Affirmative | N/A |
| 10 | Florida Reliability | Peter Heidrich | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | Coordinating Council | | | | |
| 10 | Midwest Reliability Organization | Russel Mountjoy | | Affirmative | N/A |
| 10 | Northeast Power Coordinating Council | Guy V. Zito | | Affirmative | N/A |
| 10 | ReliabilityFirst | Anthony Jablonski | | Affirmative | N/A |
| 10 | SERC Reliability Corporation | Joe Spencer | | Affirmative | N/A |
| 10 | Southwest Power Pool Regional Entity | Bob Reynolds | | Affirmative | N/A |
| 10 | Texas Reliability Entity, Inc. | Rachel Coyne | | Affirmative | N/A |
| 10 | Western Electricity Coordinating Council | Steven Rueckert | | Affirmative | N/A |

Previous 1 Next

Showing 1 to 298 of 298 entries

# *BALLOT RESULTS*

Survey: View Survey Results (/SurveyResults/Index/28)
**Ballot Name:** 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 Non-binding Poll IN 1 NB
**Voting Start Date:** 9/9/2015 12:01:00 AM
**Voting End Date:** 9/18/2015 8:00:00 PM
**Ballot Type:** NB
**Ballot Activity:** IN
**Ballot Series:** 1
**Total # Votes:** 223
**Total Ballot Pool:** 269
**Quorum:** 82.9
**Weighted Segment Value:** 89.2

| Segment | Ballot Pool | Segment Weight | Affirmative Votes | Affirmative Fraction | Negative Votes w/ Comment | Negative Fraction w/ Comment | Negative Votes w/o Comment | Abstain | No Vote |
|---|---|---|---|---|---|---|---|---|---|
| Segment: 1 | 69 | 1 | 42 | 0.933 | 3 | 0.067 | 0 | 14 | 10 |
| Segment: 2 | 8 | 0.5 | 4 | 0.4 | 1 | 0.1 | 0 | 1 | 2 |
| Segment: 3 | 65 | 1 | 37 | 0.881 | 5 | 0.119 | 0 | 12 | 11 |
| Segment: 4 | 21 | 1 | 11 | 0.688 | 5 | 0.312 | 0 | 3 | 2 |
| Segment: 5 | 60 | 1 | 31 | 0.939 | 2 | 0.061 | 0 | 10 | 17 |
| Segment: 6 | 36 | 1 | 25 | 0.926 | 2 | 0.074 | 0 | 5 | 4 |
| Segment: 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Segment: 8 | 1 | 0.1 | 1 | 0.1 | 0 | 0 | 0 | 0 | 0 |
| Segment: | 2 | 0.2 | 1 | 0.1 | 1 | 0.1 | 0 | 0 | 0 |

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| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 9 | | | | | | | | | |
| Segment: 10 | 7 | 0.5 | 5 | 0.5 | 0 | 0 | 0 | 2 | 0 |
| Totals: | 269 | 6.3 | 157 | 5.467 | 19 | 0.833 | 0 | 47 | 46 |

## *BALLOT POOL MEMBERS*

Show All entries Search: Search

| Segment | Organization | Voter | Designated Proxy | Ballot | NERC Memo |
|---|---|---|---|---|---|
| 1 | Ameren - Ameren Services | Eric Scott | | None | N/A |
| 1 | APS - Arizona Public Service Co. | Michelle Amarantos | | Affirmative | N/A |
| 1 | Associated Electric Cooperative, Inc. | Phil Hart | | Affirmative | N/A |
| 1 | Avista - Avista Corporation | Bryan Cox | Rich Hydzik | Affirmative | N/A |
| 1 | Balancing Authority of Northern California | Kevin Smith | Joe Tarantino | Affirmative | N/A |
| 1 | BC Hydro and Power Authority | Patricia Robertson | | Abstain | N/A |
| 1 | Beaches Energy Services | Don Cuevas | | Negative | Comments Submitted |
| 1 | Berkshire Hathaway Energy - MidAmerican Energy Co. | Terry Harbour | | Affirmative | N/A |
| 1 | Bonneville Power Administration | Donald Watkins | | Affirmative | N/A |
| 1 | Brazos Electric | Tony Kroskey | | None | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | Power Cooperative, Inc. | | | | |
| 1 | Bryan Texas Utilities | John Fontenot | | Affirmative | N/A |
| 1 | CenterPoint Energy Houston Electric, LLC | John Brockhan | | Abstain | N/A |
| 1 | Central Electric Power Cooperative (Missouri) | Michael Bax | | None | N/A |
| 1 | Cleco Corporation | John Lindsey | Louis Guidry | Affirmative | N/A |
| 1 | Con Ed - Consolidated Edison Co. of New York | Chris de Graffenried | | Affirmative | N/A |
| 1 | Dairyland Power Cooperative | Robert Roddy | | Affirmative | N/A |
| 1 | Dominion - Dominion Virginia Power | Larry Nash | | Abstain | N/A |
| 1 | Duke Energy | Doug Hils | | Affirmative | N/A |
| 1 | Edison International - Southern California Edison Company | Steven Mavis | | Affirmative | N/A |
| 1 | Entergy - Entergy Services, Inc. | Oliver Burke | | Affirmative | N/A |
| 1 | FirstEnergy - FirstEnergy Corporation | William Smith | | Affirmative | N/A |
| 1 | Georgia Transmission Corporation | Jason Snodgrass | | Affirmative | N/A |
| 1 | Great Plains Energy - Kansas City Power and Light Co. | James McBee | Douglas Webb | Affirmative | N/A |
| 1 | Great River Energy | Gordon Pietsch | | Affirmative | N/A |
| 1 | Hoosier Energy Rural Electric Cooperative, Inc. | Bob Solomon | | None | N/A |
| 1 | Hydro One Networks, Inc. | Payam Farahbakhsh | | Abstain | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 1 | Hydro-Qu?bec TransEnergie | Martin Boisvert | | Affirmative | N/A |
| 1 | IDACORP - Idaho Power Company | Molly Devine | | Affirmative | N/A |
| 1 | International Transmission Company Holdings Corporation | Michael Moltane | Meghan Ferguson | Abstain | N/A |
| 1 | KAMO Electric Cooperative | Walter Kenyon | | Affirmative | N/A |
| 1 | Los Angeles Department of Water and Power | faranak sarbaz | | Abstain | N/A |
| 1 | Lower Colorado River Authority | Teresa Cantwell | | Abstain | N/A |
| 1 | M and A Electric Power Cooperative | William Price | | Affirmative | N/A |
| 1 | Manitoba Hydro | Mike Smith | | Affirmative | N/A |
| 1 | MEAG Power | David Weekley | Scott Miller | None | N/A |
| 1 | Muscatine Power and Water | Andy Kurriger | | Affirmative | N/A |
| 1 | National Grid USA | Michael Jones | | Affirmative | N/A |
| 1 | Nebraska Public Power District | Jamison Cawley | | Abstain | N/A |
| 1 | New York Power Authority | Salvatore Spagnolo | | None | N/A |
| 1 | NextEra Energy - Florida Power and Light Co. | Mike ONeil | | Affirmative | N/A |
| 1 | NiSource - Northern Indiana Public Service Co. | Julaine Dyke | | Affirmative | N/A |
| 1 | Northeast Missouri Electric Power Cooperative | Kevin White | | Affirmative | N/A |
| 1 | NorthWestern Energy | Belinda Tierney | | None | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 1 | OGE Energy - Oklahoma Gas and Electric Co. | Terri Pyle | | None | N/A |
| 1 | Oncor Electric Delivery | Rod Kinard | Gul Khan | Affirmative | N/A |
| 1 | Peak Reliability | Jared Shakespeare | | Abstain | N/A |
| 1 | Platte River Power Authority | John Collins | | Abstain | N/A |
| 1 | PNM Resources - Public Service Company of New Mexico | Laurie Williams | | None | N/A |
| 1 | PPL Electric Utilities Corporation | Brenda Truhe | | Abstain | N/A |
| 1 | PSEG - Public Service Electric and Gas Co. | Joseph Smith | | Abstain | N/A |
| 1 | Public Utility District No. 1 of Snohomish County | Long Duong | | Affirmative | N/A |
| 1 | Public Utility District No. 2 of Grant County, Washington | Michiko Sell | | Negative | Comments Submitted |
| 1 | Sacramento Municipal Utility District | Tim Kelley | Joe Tarantino | Affirmative | N/A |
| 1 | Salt River Project | Steven Cobb | | Affirmative | N/A |
| 1 | Santee Cooper | Shawn Abrams | | Affirmative | N/A |
| 1 | SCANA - South Carolina Electric and Gas Co. | Tom Hanzlik | | Abstain | N/A |
| 1 | Seattle City Light | Pawel Krupa | | Affirmative | N/A |
| 1 | Seminole Electric Cooperative, Inc. | Mark Churilla | Bret Galbraith | Affirmative | N/A |
| 1 | Sho-Me Power Electric Cooperative | Denise Stevens | | Affirmative | N/A |
| 1 | Southern Company - | Robert A. Schaffeld | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | Southern Company Services, Inc. | | | | |
| 1 | Southwest Transmission Cooperative, Inc. | John Shaver | | Negative | Comments Submitted |
| 1 | Tacoma Public Utilities (Tacoma, WA) | John Merrell | | Affirmative | N/A |
| 1 | Tallahassee Electric (City of Tallahassee, FL) | Scott Langston | | Affirmative | N/A |
| 1 | Tennessee Valley Authority | Howell Scott | | Abstain | N/A |
| 1 | Tri-State G and T Association, Inc. | Tracy Sliman | | Affirmative | N/A |
| 1 | Unisource - Tucson Electric Power Co. | John Tolo | | Affirmative | N/A |
| 1 | United Illuminating Co. | Jonathan Appelbaum | | Affirmative | N/A |
| 1 | Westar Energy | Kevin Giles | | Affirmative | N/A |
| 1 | Western Area Power Administration | Steve Johnson | | None | N/A |
| 2 | BC Hydro and Power Authority | Venkataramakrishnan Vinnakota | | Abstain | N/A |
| 2 | California ISO | Richard Vine | | Affirmative | N/A |
| 2 | Electric Reliability Council of Texas, Inc. | christina bigelow | | Negative | Comments Submitted |
| 2 | Herb Schrayshuen | Herb Schrayshuen | | Affirmative | N/A |
| 2 | Independent Electricity System Operator | Leonard Kula | | Affirmative | N/A |
| 2 | Midcontinent ISO, Inc. | Terry BIlke | | None | N/A |
| 2 | New York Independent System Operator | Gregory Campoli | | None | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 2 | PJM Interconnection, L.L.C. | Mark Holman | | Affirmative | N/A |
| 3 | Ameren - Ameren Services | David Jendras | | None | N/A |
| 3 | Anaheim Public Utilities Dept. | Dennis Schmidt | | Abstain | N/A |
| 3 | APS - Arizona Public Service Co. | Jeri Freimuth | | Affirmative | N/A |
| 3 | Associated Electric Cooperative, Inc. | Todd Bennett | | Affirmative | N/A |
| 3 | Austin Energy | Lisa Martin | | Affirmative | N/A |
| 3 | Avista - Avista Corporation | Scott Kinney | | Abstain | N/A |
| 3 | Basin Electric Power Cooperative | Jeremy Voll | | Affirmative | N/A |
| 3 | BC Hydro and Power Authority | Pat Harrington | | None | N/A |
| 3 | Beaches Energy Services | Steven Lancaster | | Negative | Comments Submitted |
| 3 | Berkshire Hathaway Energy - MidAmerican Energy Co. | Thomas Mielnik | Darnez Gresham | Affirmative | N/A |
| 3 | Bonneville Power Administration | Rebecca Berdahl | | Affirmative | N/A |
| 3 | Central Electric Power Cooperative (Missouri) | Adam Weber | | Affirmative | N/A |
| 3 | City of Green Cove Springs | Mark Schultz | | Negative | Comments Submitted |
| 3 | City of Leesburg | Chris Adkins | | Negative | Comments Submitted |
| 3 | Clark Public Utilities | Jack Stamper | | Affirmative | N/A |
| 3 | CMS Energy - Consumers Energy Company | Karl Blaszkowski | | Affirmative | N/A |
| 3 | Colorado Springs | Charles Morgan | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | Utilities | | | | |
| 3 | Con Ed - Consolidated Edison Co. of New York | Peter Yost | | Affirmative | N/A |
| 3 | Dominion - Dominion Resources, Inc. | Connie Lowe | | Abstain | N/A |
| 3 | DTE Energy - Detroit Edison Company | Kent Kujala | | Affirmative | N/A |
| 3 | Duke Energy | Lee Schuster | | Affirmative | N/A |
| 3 | Edison International - Southern California Edison Company | Romel Aquino | | Affirmative | N/A |
| 3 | FirstEnergy - FirstEnergy Corporation | Theresa Ciancio | | Affirmative | N/A |
| 3 | Florida Municipal Power Agency | Joe McKinney | | Negative | Comments Submitted |
| 3 | Georgia System Operations Corporation | Scott McGough | | Affirmative | N/A |
| 3 | Grand River Dam Authority | Jeff Wells | | Abstain | N/A |
| 3 | Great Plains Energy - Kansas City Power and Light Co. | Jessica Tucker | Douglas Webb | Affirmative | N/A |
| 3 | Great River Energy | Brian Glover | | Affirmative | N/A |
| 3 | Hydro One Networks, Inc. | Paul Malozewski | Oshani Pathirane | Abstain | N/A |
| 3 | JEA | Garry Baker | | None | N/A |
| 3 | KAMO Electric Cooperative | Ted Hilmes | | Affirmative | N/A |
| 3 | Lakeland Electric | Mace Hunter | | Negative | Comments Submitted |
| 3 | Lincoln Electric System | Jason Fortik | | Abstain | N/A |
| 3 | Los Angeles Department of Water | Mike Anctil | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | and Power | | | | |
| 3 | M and A Electric Power Cooperative | Stephen Pogue | | Affirmative | N/A |
| 3 | Manitoba Hydro | Karim Abdel-Hadi | | Affirmative | N/A |
| 3 | MEAG Power | Roger Brand | Scott Miller | None | N/A |
| 3 | Muscatine Power and Water | Seth Shoemaker | | Affirmative | N/A |
| 3 | National Grid USA | Brian Shanahan | | Affirmative | N/A |
| 3 | Nebraska Public Power District | Tony Eddleman | | Abstain | N/A |
| 3 | New York Power Authority | David Rivera | | Affirmative | N/A |
| 3 | NiSource - Northern Indiana Public Service Co. | Ramon Barany | | None | N/A |
| 3 | Northeast Missouri Electric Power Cooperative | Skyler Wiegmann | | Affirmative | N/A |
| 3 | OGE Energy - Oklahoma Gas and Electric Co. | Donald Hargrove | | Abstain | N/A |
| 3 | PNM Resources | Michael Mertz | | None | N/A |
| 3 | PPL - Louisville Gas and Electric Co. | Charles Freibert | | None | N/A |
| 3 | PSEG - Public Service Electric and Gas Co. | Jeffrey Mueller | | Abstain | N/A |
| 3 | Public Utility District No. 1 of Okanogan County | Dale Dunckel | | None | N/A |
| 3 | Puget Sound Energy, Inc. | Andrea Basinski | | None | N/A |
| 3 | Sacramento Municipal Utility District | Rachel Moore | Joe Tarantino | Affirmative | N/A |
| 3 | Salt River Project | John Coggins | | Affirmative | N/A |
| 3 | Santee Cooper | James Poston | | Affirmative | N/A |

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|---|---|---|---|---|---|
| 3 | SCANA - South Carolina Electric and Gas Co. | Clay Young | | None | N/A |
| 3 | Seattle City Light | Dana Wheelock | | Affirmative | N/A |
| 3 | Seminole Electric Cooperative, Inc. | James Frauen | | Affirmative | N/A |
| 3 | Sho-Me Power Electric Cooperative | Jeff Neas | | Affirmative | N/A |
| 3 | Snohomish County PUD No. 1 | Mark Oens | | Affirmative | N/A |
| 3 | Southern Company - Alabama Power Company | R. Scott Moore | | Affirmative | N/A |
| 3 | Tacoma Public Utilities (Tacoma, WA) | Marc Donaldson | | Affirmative | N/A |
| 3 | Tallahassee Electric (City of Tallahassee, FL) | John Williams | | Abstain | N/A |
| 3 | TECO - Tampa Electric Co. | Ronald Donahey | | None | N/A |
| 3 | Tennessee Valley Authority | Ian Grant | | Abstain | N/A |
| 3 | Tri-State G and T Association, Inc. | Janelle Marriott Gill | | Affirmative | N/A |
| 3 | Westar Energy | Bo Jones | | Affirmative | N/A |
| 3 | Xcel Energy, Inc. | Michael Ibold | | Abstain | N/A |
| 4 | Alliant Energy Corporation Services, Inc. | Kenneth Goldsmith | | Affirmative | N/A |
| 4 | Austin Energy | Tina Garvey | | Affirmative | N/A |
| 4 | Blue Ridge Power Agency | Duane Dahlquist | | None | N/A |
| 4 | City of Clewiston | Lynne Mila | | Negative | Comments Submitted |
| 4 | City of New Smyrna | Tim Beyrle | | Negative | Comments |

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|---|---|---|---|---|---|
| | Beach Utilities Commission | | | | Submitted |
| 4 | DTE Energy - Detroit Edison Company | Daniel Herring | | Affirmative | N/A |
| 4 | FirstEnergy - Ohio Edison Company | Doug Hohlbaugh | | Affirmative | N/A |
| 4 | Florida Municipal Power Agency | Carol Chinn | | Negative | Comments Submitted |
| 4 | Georgia System Operations Corporation | Guy Andrews | | Affirmative | N/A |
| 4 | Illinois Municipal Electric Agency | Bob Thomas | | Abstain | N/A |
| 4 | Keys Energy Services | Stanley Rzad | | Negative | Comments Submitted |
| 4 | Municipal Energy Agency of Nebraska | Robin Spady | | Abstain | N/A |
| 4 | Public Utility District No. 1 of Snohomish County | John Martinsen | | Affirmative | N/A |
| 4 | Public Utility District No. 2 of Grant County, Washington | Yvonne McMackin | | Negative | Comments Submitted |
| 4 | Sacramento Municipal Utility District | Michael Ramirez | Joe Tarantino | Affirmative | N/A |
| 4 | Seattle City Light | Hao Li | | Affirmative | N/A |
| 4 | Seminole Electric Cooperative, Inc. | Michael Ward | | Affirmative | N/A |
| 4 | South Mississippi Electric Power Association | Steve McElhaney | | None | N/A |
| 4 | Tacoma Public Utilities (Tacoma, WA) | Hien Ho | | Affirmative | N/A |
| 4 | Utility Services, Inc. | Brian Evans-Mongeon | | Abstain | N/A |
| 4 | WEC Energy Group, Inc. | Anthony Jankowski | | Affirmative | N/A |

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|---|---|---|---|---|---|
| 5 | AEP | Thomas Foltz | | Abstain | N/A |
| 5 | Ameren - Ameren Missouri | Sam Dwyer | | None | N/A |
| 5 | APS - Arizona Public Service Co. | Stephanie Little | | Affirmative | N/A |
| 5 | Austin Energy | Jeanie Doty | | Affirmative | N/A |
| 5 | Avista - Avista Corporation | Steve Wenke | | None | N/A |
| 5 | Basin Electric Power Cooperative | Mike Kraft | | None | N/A |
| 5 | BC Hydro and Power Authority | Clement Ma | | None | N/A |
| 5 | Boise-Kuna Irrigation District - Lucky Peak Power Plant Project | Mike Kukla | | Affirmative | N/A |
| 5 | Bonneville Power Administration | Francis Halpin | | Affirmative | N/A |
| 5 | Brazos Electric Power Cooperative, Inc. | Shari Heino | | Affirmative | N/A |
| 5 | Calpine Corporation | Hamid Zakery | | Abstain | N/A |
| 5 | Choctaw Generation Limited Partnership, LLLP | Rob Watson | | Affirmative | N/A |
| 5 | City and County of San Francisco | Daniel Mason | | Affirmative | N/A |
| 5 | City of Independence, Power and Light Department | Jim Nail | | Affirmative | N/A |
| 5 | Cleco Corporation | Stephanie Huffman | Louis Guidry | Affirmative | N/A |
| 5 | CMS Energy - Consumers Energy Company | David Greyerbiehl | | Abstain | N/A |
| 5 | Con Ed - Consolidated Edison Co. of New York | Brian O'Boyle | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 5 | Dairyland Power Cooperative | Tommy Drea | | Affirmative | N/A |
| 5 | DTE Energy - Detroit Edison Company | Jeffrey DePriest | | Affirmative | N/A |
| 5 | Duke Energy | Dale Goodwine | | Affirmative | N/A |
| 5 | Edison International - Southern California Edison Company | Michael McSpadden | | Affirmative | N/A |
| 5 | Entergy - Entergy Services, Inc. | Tracey Stubbs | | None | N/A |
| 5 | FirstEnergy - FirstEnergy Solutions | Robert Loy | | None | N/A |
| 5 | Florida Municipal Power Agency | David Schumann | | Negative | Comments Submitted |
| 5 | Great Plains Energy - Kansas City Power and Light Co. | Harold Wyble | Douglas Webb | Affirmative | N/A |
| 5 | Great River Energy | Preston Walsh | | Affirmative | N/A |
| 5 | Hydro-Qu?bec Production | Roger Dufresne | | Abstain | N/A |
| 5 | JEA | John Babik | | Affirmative | N/A |
| 5 | Lakeland Electric | Jim Howard | | None | N/A |
| 5 | Lincoln Electric System | Kayleigh Wilkerson | | Abstain | N/A |
| 5 | Los Angeles Department of Water and Power | Kenneth Silver | | None | N/A |
| 5 | Lower Colorado River Authority | Dixie Wells | | Abstain | N/A |
| 5 | Luminant - Luminant Generation Company LLC | Rick Terrill | | None | N/A |
| 5 | Manitoba Hydro | Yuguang Xiao | | Affirmative | N/A |
| 5 | Massachusetts Municipal Wholesale Electric Company | David Gordon | | Abstain | N/A |

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|---|---|---|---|---|---|
| 5 | MEAG Power | Steven Grego | Scott Miller | None | N/A |
| 5 | Muscatine Power and Water | Mike Avesing | | Affirmative | N/A |
| 5 | Nebraska Public Power District | Don Schmit | | Abstain | N/A |
| 5 | New York Power Authority | Wayne Sipperly | | Affirmative | N/A |
| 5 | NextEra Energy | Allen Schriver | | Affirmative | N/A |
| 5 | NiSource - Northern Indiana Public Service Co. | Michael Melvin | | Affirmative | N/A |
| 5 | OGE Energy - Oklahoma Gas and Electric Co. | Leo Staples | | Negative | Comments Submitted |
| 5 | Oglethorpe Power Corporation | Bernard Johnson | | None | N/A |
| 5 | Omaha Public Power District | Mahmood Safi | | Affirmative | N/A |
| 5 | Pacific Gas and Electric Company | Alex Chua | | None | N/A |
| 5 | PPL Electric Utilities Corporation | Dan Wilson | | None | N/A |
| 5 | PSEG - PSEG Fossil LLC | Tim Kucey | | Abstain | N/A |
| 5 | Public Utility District No. 1 of Snohomish County | Sam Nietfeld | | Affirmative | N/A |
| 5 | Public Utility District No. 2 of Grant County, Washington | Alex Ybarra | | Affirmative | N/A |
| 5 | Puget Sound Energy, Inc. | Lynda Kupfer | | None | N/A |
| 5 | Sacramento Municipal Utility District | Susan Gill-Zobitz | Joe Tarantino | Affirmative | N/A |
| 5 | Salt River Project | Kevin Nielsen | | Affirmative | N/A |
| 5 | SCANA - South | Edward Magic | | None | N/A |

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|---|---|---|---|---|---|
| | Carolina Electric and Gas Co. | | | | |
| 5 | Seattle City Light | Mike Haynes | | Affirmative | N/A |
| 5 | Southern Company - Southern Company Generation | William D. Shultz | | Affirmative | N/A |
| 5 | Tacoma Public Utilities (Tacoma, WA) | Chris Mattson | | None | N/A |
| 5 | Tallahassee Electric (City of Tallahassee, FL) | Karen Webb | | Affirmative | N/A |
| 5 | Tennessee Valley Authority | Brandy Spraker | | Abstain | N/A |
| 5 | Westar Energy | stephanie johnson | | Affirmative | N/A |
| 5 | Xcel Energy, Inc. | David Lemmons | | None | N/A |
| 6 | Ameren - Ameren Services | Robert Quinlivan | | None | N/A |
| 6 | APS - Arizona Public Service Co. | Bobbi Welch | | Affirmative | N/A |
| 6 | Associated Electric Cooperative, Inc. | Brian Ackermann | | Affirmative | N/A |
| 6 | Austin Energy | Andrew Gallo | | None | N/A |
| 6 | Berkshire Hathaway - PacifiCorp | Sandra Shaffer | | Abstain | N/A |
| 6 | Bonneville Power Administration | Alex Spain | | Affirmative | N/A |
| 6 | Cleco Corporation | Robert Hirchak | Louis Guidry | Affirmative | N/A |
| 6 | Colorado Springs Utilities | Shannon Fair | | Affirmative | N/A |
| 6 | Con Ed - Consolidated Edison Co. of New York | Robert Winston | | Affirmative | N/A |
| 6 | Duke Energy | Greg Cecil | | Affirmative | N/A |
| 6 | FirstEnergy - FirstEnergy Solutions | Ann Ivanc | Richard Hoag | Affirmative | N/A |

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|---|---|---|---|---|---|
| 6 | Florida Municipal Power Agency | Richard Montgomery | | Negative | Comments Submitted |
| 6 | Florida Municipal Power Pool | Tom Reedy | | Negative | Comments Submitted |
| 6 | Great Plains Energy - Kansas City Power and Light Co. | Chris Bridges | Douglas Webb | Affirmative | N/A |
| 6 | Great River Energy | Donna Stephenson | Michael Brytowski | Affirmative | N/A |
| 6 | Lower Colorado River Authority | Michael Shaw | | Abstain | N/A |
| 6 | Manitoba Hydro | Blair Mukanik | | Affirmative | N/A |
| 6 | Muscatine Power and Water | Ryan Streck | | Affirmative | N/A |
| 6 | New York Power Authority | Shivaz Chopra | | Affirmative | N/A |
| 6 | NextEra Energy - Florida Power and Light Co. | Silvia Mitchell | | Abstain | N/A |
| 6 | NiSource - Northern Indiana Public Service Co. | Joe O'Brien | | Affirmative | N/A |
| 6 | OGE Energy - Oklahoma Gas and Electric Co. | Jerry Nottnagel | | None | N/A |
| 6 | Oglethorpe Power Corporation | Donna Johnson | | Affirmative | N/A |
| 6 | Platte River Power Authority | Carol Ballantine | | Abstain | N/A |
| 6 | PPL - Louisville Gas and Electric Co. | OELKER LINN | | None | N/A |
| 6 | Sacramento Municipal Utility District | Diane Clark | Joe Tarantino | Affirmative | N/A |
| 6 | Salt River Project | William Abraham | Chris Janick | Affirmative | N/A |
| 6 | Santee Cooper | Michael Brown | | Affirmative | N/A |
| 6 | Seattle City Light | Charles Freeman | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 6 | Seminole Electric Cooperative, Inc. | Trudy Novak | | Affirmative | N/A |
| 6 | Snohomish County PUD No. 1 | Kenn Backholm | | Affirmative | N/A |
| 6 | Southern Company - Southern Company Generation and Energy Marketing | John J. Ciza | | Affirmative | N/A |
| 6 | Tacoma Public Utilities (Tacoma, WA) | Rick Applegate | | Affirmative | N/A |
| 6 | Talen Energy Marketing, LLC | Elizabeth Davis | | Affirmative | N/A |
| 6 | Tennessee Valley Authority | Marjorie Parsons | | Abstain | N/A |
| 6 | Westar Energy | Tiffany Lake | | Affirmative | N/A |
| 8 | David Kiguel | David Kiguel | | Affirmative | N/A |
| 9 | City of Vero Beach | Ginny Beigel | | Negative | Comments Submitted |
| 9 | Commonwealth of Massachusetts Department of Public Utilities | Donald Nelson | | Affirmative | N/A |
| 10 | Florida Reliability Coordinating Council | Peter Heidrich | | Affirmative | N/A |
| 10 | Midwest Reliability Organization | Russel Mountjoy | | Affirmative | N/A |
| 10 | Northeast Power Coordinating Council | Guy V. Zito | | Affirmative | N/A |
| 10 | ReliabilityFirst | Anthony Jablonski | | Affirmative | N/A |
| 10 | SERC Reliability Corporation | Joe Spencer | | Affirmative | N/A |
| 10 | Southwest Power Pool Regional Entity | Bob Reynolds | | Abstain | N/A |
| 10 | Western Electricity Coordinating Council | Steven Rueckert | | Abstain | N/A |

Showing 1 to 269 of 269 entries

Previous 1 Next

# Survey Report

## Survey Details

**Name** 2010-04.1 MOD-031 FERC Order No. 804 Directives | MOD-031-2

**Description**

**Start Date** 7/31/2015

**End Date** 9/18/2015

**Associated Ballots**

2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 IN 1 ST

2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 Non-binding Poll IN 1 NB

### Survey Questions

***1. The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.***

***Yes***

***No***

## Responses By Question

***1. The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.***

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Thomas Foltz - AEP - 5 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

## Group Information

Group Name: ISO Standards Review Committee

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Charles Yeung | SPP | SPP | 2 |
| Ben Li | IESO | NPCC | 2 |
| Mark Holman | PJM | RFC | 2 |
| Kathleen Goodman | ISONE | NPCC | 2 |
| Greg Campoli | NYISO | NPCC | 2 |
| Ali Miremadi | CAISO | WECC | 2 |
| Terry Bilke | MISO | RFC | 2 |

## Voter Information

**Voter**

Albert DiCaprio

**Segment**

2

**Entity**

PJM Interconnection, L.L.C.

**Region(s)**

RFC

**Selected Answer:** Yes

**Answer Comment:**

The ISO/RTO Standards Review Committee (ERCOT abtaining) agrees with the proposed revisions.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** No

**Answer Comment:**

While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Gul Khan - Gul Khan On Behalf of: Rod Kinard, Oncor Electric Delivery, 1**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** No

**Answer Comment:**

Please refer to ERCOT's responses provided in response to the MOD-031-1 survey.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Bob Thomas - Illinois Municipal Electric Agency - 4 -**

**Selected Answer:** No

**Answer Comment:**

Given the stongly suppported rationale for deactivating the LSE registration function under the Risk-Based Registration initiative, Requirement 2 and Requirement 4 should be revised to remove the reference to LSE.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Teresa Czyz - Teresa Czyz - -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

## Group Information

Group Name: MRO-NERC Standards Review Forum (NSRF)

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Joe Depoorter | Madison Gas & Electric | MRO | 3,4,5,6 |
| Amy Casucelli | Xcel Energy | MRO | 1,3,5,6 |
| Chuck Lawrence | American Transmission Company | MRO | 1 |
| Chuck Wicklund | Otter Tail Power Company | MRO | 1,3,5 |
| Theresa Allard | Minnkota Power Cooperative, Inc | MRO | 1,3,5,6 |
| Dave Rudolph | Basin Electric Power Cooperative | MRO | 1,3,5,6 |
| Kayleigh Wilkerson | Lincoln Electric System | MRO | 1,3,5,6 |
| Jodi Jenson | Western Area Power Administration | MRO | 1,6 |
| Larry Heckert | Alliant Energy | MRO | 4 |
| Mahmood Safi | Omaha Public Utility District | MRO | 1,3,5,6 |
| Shannon Weaver | Midwest ISO Inc. | MRO | 2 |
| Mike Brytowski | Great River Energy | MRO | 1,3,5,6 |
| Brad Perrett | Minnesota Power | MRO | 1,5 |
| Scott Nickels | Rochester Public Utilities | MRO | 4 |
| Terry Harbour | MidAmerican Energy Company | MRO | 1,3,5,6 |
| Tom Breene | Wisconsin Public Service Corporation | MRO | 3,4,5,6 |
| Tony Eddleman | Nebraska Public Power District | MRO | 1,3,5 |

## Voter Information

| Voter | Segment |
|---|---|
| Emily Rousseau | 1,2,3,4,5,6 |
| **Entity** | **Region(s)** |
| MRO | MRO |

**Selected Answer:** Yes

**Answer Comment:**

The NSRF recommends that R4 bulleted items be updated to reflect the below changes. Our biggest concern is that all three bulleted items must be accomplished since there is an “and” at the end of the first and second bullet. The new wording allows entities the flexibility, which the NSRF believes is the intent of the bulleted items. The NSRF recommends:

- Shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement, unless,
- The requested data, if provided, would conflict with Applicable Entity’s confidentiality, regulatory, or security requirements
- Shall not be required to alter the format in which it maintains or uses the data.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Tom Reedy - Florida Municipal Power Pool - 6 -**

**Selected Answer:** No

**Answer Comment:**

While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Elizabeth Axson - Elizabeth Axson On Behalf of: christina bigelow, Electric Reliability Council of Texas, Inc., 2**

**Selected Answer:**

**Answer Comment:**

While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not

collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.

Christina Bigelow, Electric Reliability Council of Texas, Inc., 2, 8/31/2015

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

## Group Information

Group Name: NCP and Nash

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Louis Slade | Dominion - NERC Compliance Policy | NA - Not Applicable | 1,3,5,6 |
| Randi Heise | Dominion - NERC Compliance Policy | NA - Not Applicable | 1,3,5,6 |
| Larry Nash | Dominion - Electric Transmission Compliance | SERC | 1,3,5,6 |

## Voter Information

**Voter**

Connie Lowe

**Segment**

3

**Entity**

Dominion - Dominion Resources, Inc.

**Region(s)**

**Selected Answer:** Yes

**Answer Comment:**

Given that NERC has requested removal of LSE (docket # RR15-4-000) from NERC Registry Criteria, Dominion suggests removal in this standard.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Chantal Mazza - Hydro-Qu?bec TransEnergie - 2 - NA - Not Applicable**

**Selected Answer:** Yes

**Answer Comment:**

Additional comments :

- Hydro-Québec TransÉnergie's Compliance staff recently questioned a TP, BA, LSE and an entity from a neighbouring Interconnection on how to calculate Integrated demands (see 1.3.1 and 1.3.2 of MOD-031) and received 4 different answers. We recommend adding these terms to the NERC glossary with a mathematical formula or adding the formulae to an Appendix of MOD-031.

- Requested change to Implementation Plan:

Considering the nature of proposed changes to MOD-031 e.g. ensuring that the obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations, we believe that version 2 does not require any delay for implementation and is easier to implement than version 1. Therefore, we suggest that the implementation calendar be modified to read:

"MOD -031- 2 shall become effective as

The later of the effective date of MOD 30 1 -
quarter after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the effective date of MOD -
or the first day of the first calendar quarter after the date the standard is adopted bythe NERC Board of Trustees or as otherwise provided for in that jurisdiction."

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Bob Solomon - Hoosier Energy Rural Electric Cooperative, Inc. - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

## Group Information

Group Name: NPCC--Project 2010-04.1 MOD-031 FERC Order No. 804 Directives - MOD-031-2

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Alan Adamson | New York State Reliability Council, LLC | NPCC | 10 |
| David Burke | Orange and Rockland Utilities Inc. | NPCC | 3 |
| Greg Campoli | New York Independent System Operator | NPCC | 2 |
| Gerry Dunbar | Northeast Power Coordinating Council | NPCC | 10 |
| Mark Kenny | Northeast Utilities | NPCC | 1 |
| Helen Lainis | Independent Electricity System Operator | NPCC | 2 |
| Rob Vance | New Brunswick Power Corporation | NPCC | 9 |
| Paul Malozewski | Hydro One Networks Inc. | NPCC | 1 |
| Bruce Metruck | New York Power Authority | NPCC | 6 |
| Lee Pedowicz | Northeast Power Coordinating Council | NPCC | 10 |
| David Ramkalawan | Ontario Power Generation, Inc. | NPCC | 5 |
| Brian Robinson | Utility Services | NPCC | 8 |
| Wayne Sipperly | New York Power Authority | NPCC | 5 |
| Edward Bedder | Orange and Rockland Utilities Inc. | NPCC | 1 |
| Michael Jones | National Grid | NPCC | 1 |
| Brian Shanahan | National Grid | NPCC | 1 |
| Glen Smith | Entergy Services, Inc. | NPCC | 5 |
| RuiDa Shu | Northeast Power Coordinating Council | NPCC | 10 |
| Connie Lowe | Dominion Resources Services, Inc. | NPCC | 5 |

| | | | |
|---|---|---|---|
| Guy Zito | Northeast Power Coordinating Council | NPCC | 10 |
| Silvia Parada Mitchell | NextEra Energy, LLC | NPCC | 5 |
| Robert Pellegrini | The United Illuminating Company | NPCC | 1 |
| Kathleen Goodman | ISO - New England | NPCC | 2 |
| Kelly Dash | Consolidated Edison Co. of New York, Inc. | NPCC | 1 |
| Michael Forte | Consolidated Edison Co. of New York, Inc. | NPCC | 1 |
| Brian O'Boyle | Consolidated Edison Co. of New York, Inc. | NPCC | 8 |
| Peter Yost | Consolidated Edison Co. of New York, Inc. | NPCC | 3 |
| Sylvain Clermont | Hydro-Quebec TransEnergie | NPCC | 1 |
| Si Truc Phan | Hydro-Quebec TransEnergie | NPCC | 1 |

## Voter Information

| Voter | Segment |
|---|---|
| Lee Pedowicz | 10 |
| **Entity** | **Region(s)** |
| Northeast Power Coordinating Council | NPCC |

**Selected Answer:** Yes

**Answer Comment:**

Requirement is spelled incorrectly in the opening sentence of the second paragraph in the Rationale for R4.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Smith - SPP - 2 - SPP**

## Group Information

Group Name: SPP Standards Review Group

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Shannon Mickens | Southwest Power Pool | SPP | 2 |
| Jason Smith | Southwest Power Pool | SPP | 2 |
| Timothy Owens | Nebraska Public Power District | MRO | 1,3,5 |
| Ellen Watkins | Sunflower Electric Power Corporation | SPP | 1 |
| Mahmood Safi | Omaha Public Power District | MRO | 1,3,5 |
| Jonathan Hayes | Southwest Power Pool | SPP | 2 |
| Mike Kidwell | Empire District Electric Company | SPP | 1,3,5 |
| James Nail | City of Independence, Missouri | SPP | 3,5 |

## Voter Information

**Voter**

Jason Smith

**Segment**

2

**Entity**

SPP

**Region(s)**

SPP

**Selected Answer:** Yes

**Answer Comment:**

We disagree with the proposed change to strike the word “collected” and change it to “listed” in R3. The data in R1.3 – R1.5 is allowed to be determined to be collected by Planning Coordinator and Balancing Authority “as necessary” per R1. By changing the word in Requirement R3 to “listed”, the data is inferred to be ‘forced to be collected’ since it is in the R1.3-1.5 list rather than determined to be ‘necessary to be collected’.

We would also suggest removing the term ‘Load-Serving Entity’ from the applicability section of the requirement.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

## Group Information

Group Name: Duke Energy

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Doug Hils | Duke Energy | RFC | 1 |
| Lee Schuster | Duke Energy | FRCC | 3 |
| Dale Goodwine | Duke Energy | SERC | 5 |
| Greg Cecil | Duke Energy | RFC | 6 |

## Voter Information

**Voter**

Colby Bellville

**Segment**

1,3,5,6

**Entity**

Duke Energy

**Region(s)**

FRCC,SERC,RFC

**Selected Answer:** Yes

**Answer Comment:**

**Duke Energy agrees with the proposed changes, and thanks the drafting team for their efforts.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:** Yes

**Answer Comment:**

Texas RE noticed the VSLs for R3 references R2, rather than the requirement language which references “R1 Parts 1.3 through 1.5”.

Texas RE is concerned the terms listed under R4, “confidentiality, regulatory, or security requirements”, are vague. This language allows a registered entity to fail to respond to a data request by citing any source of confidentiality, regulatory, or security requirements, regardless of its legitimacy or importance. Texas RE request that the SDT provide examples of confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement that would prevent an Applicable Entity from providing data included in parts 1.3 -1.! R1.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Michiko Sell - Public Utility District No. 2 of Grant County, Washington - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

However, the use of "Applicable Entity" throughout the Standard is problematic as it is not a NERC defined term.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Oshani Pathirane - Oshani Pathirane On Behalf of: Paul Malozewski, Hydro One Networks, Inc., 1, 3**

**Selected Answer:** No

**Answer Comment:**

Hydro One Networks Inc. suggests that the wording “applicable entity in its area” (R1), and “applicable Regional Entity” (R3) be revised to add more clarity. The current wording is also ambiguous in specifying what data is required, and the requirement may be left open to any requests for data collection. For clarity, the standard should also specify minimum requirements. Further, the standard’s applicability to Load Serving Entities should be removed, given NERC’s intention to remove this functional entity from its list of available functional registrations.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable**

## Group Information

Group Name: ACES Standards Collaborators

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Bob Solomon | Hoosier Energy Rural Electric Cooperative, Inc. | RFC | 1 |
| Ginger Mercier | Prairie Power, Inc. | SERC | 1,3 |
| Bill Hutchison | Southern Illinois Power Cooperative | SERC | 1 |
| Michael Brytowski | Great River Energy | MRO | 1,3,5,6 |
| John Shaver | Arizona Electric Power Cooperative, Inc. | WECC | 4,5 |
| John Shaver | Southwest Transmission Cooperative, Inc. | WECC | 1 |
| Bill Watson | Old Dominion Electric Cooperative | SERC | 3,4 |
| Shari Heino | Brazos Electric Power Cooperative, Inc. | TRE | 1,5 |
| Chip Koloini | Golden Spread Electric Cooperative, Inc. | SPP | 5 |

## Voter Information

**Voter**

Brian Van Gheem

**Segment**

6

**Entity**

ACES Power Marketing

**Region(s)**

NA - Not Applicable

**Selected Answer:** Yes

**Answer Comment:**

We appreciate the SDT's efforts on clarifying the obligations to provide data to Regional Entities and the obligations of an applicable entity upon receipt of a data request seeking confidential information. We agree the proposed modifications provide sufficient clarity.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

# Consideration of Comments

**Project Name:** 2010-04.1 MOD-031 FERC Order No. 804 Directives | MOD-031-2

**Comment Period Start Date:** 7/31/2015

**Comment Period End Date:** 9/18/2015

**Associated Ballot:** 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 IN 1 ST

There were 28 responses, including comments from approximately 93 different people from approximately 64 different companies representing 9 of the 10 Industry Segments as shown on the following pages.

All comments submitted can be reviewed in their original format on the project page.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Director of Standards, Howard Gugel (via email) or at (404) 446-9693.

## Questions

1. **The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.**

## The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

***1. The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.***

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Thomas Foltz - AEP - 5 -**

**Selected Answer:** Yes

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

**Group Name:** ISO Standards Review Committee

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Charles Yeung | SPP | SPP | 2 |
| Ben Li | IESO | NPCC | 2 |
| Mark Holman | PJM | RFC | 2 |
| Kathleen Goodman | ISONE | NPCC | 2 |
| Greg Campoli | NYISO | NPCC | 2 |
| Ali Miremadi | CAISO | WECC | 2 |
| Terry Bilke | MISO | RFC | 2 |

| | |
|---|---|
| **Selected Answer:** | Yes |
| **Answer Comment:** | The ISO/RTO Standards Review Committee (ERCOT abtaining) agrees with the proposed revisions.<br>Thank you for your affirmative response. |

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

| | |
|---|---|
| **Selected Answer:** | No |
| **Answer Comment:** | While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data. |

| | |
|---|---|
| | The data specific to this standard is for the collection and reporting of data necessary for reliability analysis. The scope of the data is consistent with the current MOD standards that will be replaced by this standard. The SDT believes that if the entity does not have the data requested the entity would be required to collect the data and provide such data to the Regional Entity under this requirement. |
| **Gul Khan - Gul Khan On Behalf of: Rod Kinard, Oncor Electric Delivery, 1**<br><br>**Selected Answer:** | Yes |
| **Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**<br><br>**Selected Answer:** | Yes |
| **Leonard Kula - Independent Electricity System Operator - 2 -**<br><br>**Selected Answer:** | Yes |
| **Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**<br><br>**Selected Answer:** | Yes |
| **christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -** | |

**Selected Answer:** No

**Answer Comment:** Please refer to ERCOT's responses provided in response to the MOD-031-1 survey.
Please see our response to ERCOT's comments.

**Bob Thomas - Illinois Municipal Electric Agency - 4 -**

**Selected Answer:** No

**Answer Comment:** Given the stongly suppported rationale for deactivating the LSE registration function under the Risk-Based Registration initiative, Requirement 2 and Requirement 4 should be revised to remove the reference to LSE.
The deactivation of the LSE registration is not final at this point in time. When and if the deactivation occurs all standards that are applicable to an LSE will be re-evaluated.

**Teresa Czyz - Teresa Czyz - -**

**Selected Answer:** Yes

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Name:** MRO-NERC Standards Review Forum (NSRF)

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Joe Depoorter | Madison Gas & Electric | MRO | 3,4,5,6 |
| Amy Casucelli | Xcel Energy | MRO | 1,3,5,6 |
| Chuck Lawrence | American Transmission Company | MRO | 1 |
| Chuck Wicklund | Otter Tail Power Company | MRO | 1,3,5 |
| Theresa Allard | Minnkota Power Cooperative, Inc | MRO | 1,3,5,6 |
| Dave Rudolph | Basin Electric Power Cooperative | MRO | 1,3,5,6 |
| Kayleigh Wilkerson | Lincoln Electric System | MRO | 1,3,5,6 |
| Jodi Jenson | Western Area Power Administration | MRO | 1,6 |
| Larry Heckert | Alliant Energy | MRO | 4 |
| Mahmood Safi | Omaha Public Utility District | MRO | 1,3,5,6 |
| Shannon Weaver | Midwest ISO Inc. | MRO | 2 |

| | | | |
|---|---|---|---|
| Mike Brytowski | Great River Energy | MRO | 1,3,5,6 |
| Brad Perrett | Minnesota Power | MRO | 1,5 |
| Scott Nickels | Rochester Public Utilities | MRO | 4 |
| Terry Harbour | MidAmerican Energy Company | MRO | 1,3,5,6 |
| Tom Breene | Wisconsin Public Service Corporation | MRO | 3,4,5,6 |
| Tony Eddleman | Nebraska Public Power District | MRO | 1,3,5 |

**Selected Answer:** Yes

**Answer Comment:** The NSRF recommends that R4 bulleted items be updated to reflect the below changes. Our biggest concern is that all three bulleted items must be accomplished since there is an "and" at the end of the first and second bullet. The new wording allows entities the flexibility, which the NSRF believes is the intent of the bulleted items. The NSRF recommends:

- Shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement, unless,
- The requested data, if provided, would conflict with Applicable Entity's confidentiality, regulatory, or security requirements
- Shall not be required to alter the format in which it maintains or uses the data.

The SDT modified the requirement to address your concerns.

**Tom Reedy - Florida Municipal Power Pool - 6 -**

**Selected Answer:** No

**Answer Comment:** While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.
The data specific to this standard is for the collection and reporting of data necessary for reliability analysis. The scope of the data is consistent with the current MOD standards that will be replaced by this standard. The SDT believes that if the entity does not have the data requested the entity would be required to collect the data and provide such data to the Regional Entity under this requirement.

**Elizabeth Axson - Elizabeth Axson On Behalf of: christina bigelow, Electric Reliability Council of Texas, Inc., 2**

**Selected Answer:**

**Answer Comment:**

While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.

The data specific to this standard is for the collection and reporting of data necessary for reliability analysis. The scope of the data is consistent with the current MOD standards that will be replaced by this standard. The SDT believes that if the entity does not have the data requested the entity would be required to collect the data and provide such data to the

Regional Entity under this requirement.

Christina Bigelow, Electric Reliability Council of Texas, Inc., 2, 8/31/2015

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

**Selected Answer:** Yes

**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

**Group Name:** NCP and Nash

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Louis Slade | Dominion - NERC Compliance Policy | NA - Not Applicable | 1,3,5,6 |
| Randi Heise | Dominion - NERC Compliance Policy | NA - Not Applicable | 1,3,5,6 |
| Larry Nash | Dominion - Electric Transmission Compliance | SERC | 1,3,5,6 |

**Selected Answer:** Yes

**Answer Comment:** Given that NERC has requested removal of LSE (docket # RR15-4-000) from NERC Registry Criteria, Dominion suggests removal in this standard.
The deactivation of the LSE registration is not final at this point in time. When and if the deactivation occurs all standards that are applicable to an LSE will be re-evaluated.

**Chantal Mazza - Hydro-Qu?bec TransEnergie - 2 - NA - Not Applicable**

**Selected Answer:** Yes

**Answer Comment:** Additional comments :

• Hydro-Québec TransÉnergie's Compliance staff recently questioned a TP, BA, LSE and an entity from a neighbouring Interconnection on how to calculate Integrated demands (see 1.3.1 and 1.3.2 of MOD-031) and received 4 different answers. We recommend adding these terms to the NERC glossary with a mathematical formula or adding the formulae to an Appendix of MOD-031.
The SDT believes that your suggested modification is outside the scope of the SAR created for development of this draft of the standard. The SDT encourages you to develop a SAR to address your issue and submit it to NERC.

• Requested change to Implementation Plan:

Considering the nature of proposed changes to MOD-031 e.g. ensuring that the obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations, we believe that version 2 does not require any delay for implementation and is easier to implement than version 1. Therefore, we suggest that the implementation calendar be modified to read:

"MOD-031-2 shall become effective as follows:

The later of the effective date of MOD-031-1 or the first day of the first calendar quarter after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the effective date of MOD-031-1 or the first day of the first calendar quarter after the date the standard is adopted bythe NERC Board of Trustees or as otherwise provided for in that jurisdiction."

The SDT thanks you for your suggested modification to the effective date. However, the SDT does not believe that it has industry consensus to support modifying the effective date.

**Bob Solomon - Hoosier Energy Rural Electric Cooperative, Inc. - 1 -**

**Selected Answer:** Yes

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Group Name:** NPCC--Project 2010-04.1 MOD-031 FERC Order No. 804 Directives - MOD-031-2

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Alan Adamson | New York State Reliability Council, LLC | NPCC | 10 |
| David Burke | Orange and Rockland Utilities Inc. | NPCC | 3 |
| Greg Campoli | New York Independent System Operator | NPCC | 2 |
| Gerry Dunbar | Northeast Power Coordinating Council | NPCC | 10 |
| Mark Kenny | Northeast Utilities | NPCC | 1 |
| Helen Lainis | Independent Electricity System Operator | NPCC | 2 |
| Rob Vance | New Brunswick Power Corporation | NPCC | 9 |
| Paul Malozewski | Hydro One Networks Inc. | NPCC | 1 |
| Bruce Metruck | New York Power Authority | NPCC | 6 |
| Lee Pedowicz | Northeast Power Coordinating Council | NPCC | 10 |
| David Ramkalawan | Ontario Power Generation, Inc. | NPCC | 5 |
| Brian Robinson | Utility Services | NPCC | 8 |

| | | | |
|---|---|---|---|
| Wayne Sipperly | New York Power Authority | NPCC | 5 |
| Edward Bedder | Orange and Rockland Utilities Inc. | NPCC | 1 |
| Michael Jones | National Grid | NPCC | 1 |
| Brian Shanahan | National Grid | NPCC | 1 |
| Glen Smith | Entergy Services, Inc. | NPCC | 5 |
| RuiDa Shu | Northeast Power Coordinating Council | NPCC | 10 |
| Connie Lowe | Dominion Resources Services, Inc. | NPCC | 5 |
| Guy Zito | Northeast Power Coordinating Council | NPCC | 10 |
| Silvia Parada Mitchell | NextEra Energy, LLC | NPCC | 5 |
| Robert Pellegrini | The United Illuminating Company | NPCC | 1 |
| Kathleen Goodman | ISO - New England | NPCC | 2 |
| Kelly Dash | Consolidated Edison Co. of New York, Inc. | NPCC | 1 |
| Michael Forte | Consolidated Edison Co. of New York, Inc. | NPCC | 1 |
| Brian O'Boyle | Consolidated Edison Co. of New York, Inc. | NPCC | 8 |
| Peter Yost | Consolidated Edison Co. of New York, Inc. | NPCC | 3 |
| Sylvain Clermont | Hydro-Quebec TransEnergie | NPCC | 1 |
| Si Truc Phan | Hydro-Quebec TransEnergie | NPCC | 1 |

**Selected Answer:** Yes

**Answer Comment:** Requirement is spelled incorrectly in the opening sentence of the second paragraph in the Rationale for R4.
The SDT thanks you for your affirmative response and suggested correction. The SDT has made the necessary change to the rationale box for Requirement R4.

**Jason Smith - SPP - 2 - SPP**

**Group Name:** SPP Standards Review Group

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Shannon Mickens | Southwest Power Pool | SPP | 2 |
| Jason Smith | Southwest Power Pool | SPP | 2 |
| Timothy Owens | Nebraska Public Power District | MRO | 1,3,5 |
| Ellen Watkins | Sunflower Electric Power Corporation | SPP | 1 |
| Mahmood Safi | Omaha Public Power District | MRO | 1,3,5 |
| Jonathan Hayes | Southwest Power Pool | SPP | 2 |
| Mike Kidwell | Empire District Electric Company | SPP | 1,3,5 |
| James Nail | City of Independence, Missouri | SPP | 3,5 |

**Selected Answer:** Yes

**Answer Comment:**

We disagree with the proposed change to strike the word "collected" and change it to "listed" in R3. The data in R1.3 – R1.5 is allowed to be determined to be collected by Planning Coordinator and Balancing Authority "as necessary" per R1. By changing the word in Requirement R3 to "listed", the data is inferred to be 'forced to be collected' since it is in the R1.3-1.5 list rather than determined to be 'necessary to be collected'. The early part of the requirement referencing Part 1.3 through Part 1.5 is the possible scope of the request. The request, later in the requirement, provides the actual scope of what an entity must provide.

We would also suggest removing the term 'Load-Serving Entity' from the applicability section of the requirement. The deactivation of the LSE registration is not final at this point in time. When and if the deactivation occurs all standards that are applicable to an LSE will be re-evaluated.

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Name:** Duke Energy

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Doug Hils | Duke Energy | RFC | 1 |

| | | | |
|---|---|---|---|
| Lee Schuster | Duke Energy | FRCC | 3 |
| Dale Goodwine | Duke Energy | SERC | 5 |
| Greg Cecil | Duke Energy | RFC | 6 |

**Selected Answer:** Yes

**Answer Comment:** **Duke Energy agrees with the proposed changes, and thanks the drafting team for their efforts.**
The SDT thanks you for your affirmative response.

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:** Yes

**Answer Comment:** Texas RE noticed the VSLs for R3 references R2, rather than the requirement language which references "R1 Parts 1.3 through 1.5".
The SDT has made the correction.

Texas RE is concerned the terms listed under R4, "confidentiality, regulatory, or security requirements", are vague.
Given the myriad of confidentiality, regulatory and security requirements, the standard drafting team determined that it was not appropriate to detail the exact nature of those requirements in the standard. However, under Part 4.1, the entity must provide a written response justifying the refusal to provide requested data. If, in the judgment of an auditor, the

justification was not legitimate, the entity may have violated the standard.

This language allows a registered entity to fail to respond to a data request by citing any source of confidentiality, regulatory, or security requirements, regardless of its legitimacy or importance. Texas RE request that the SDT provide examples of confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement that would prevent an Applicable Entity from providing data included in parts 1.3-1.5 of Requirement R1.
As an example of confidentiality provisions, the SDT points to the EEI response to the FERC NOPR for MOD-031-1.

**Michiko Sell - Public Utility District No. 2 of Grant County, Washington - 1 -**

**Selected Answer:** Yes

**Answer Comment:** However, the use of "Applicable Entity" throughout the Standard is problematic as it is not a NERC defined term.
The SDT thanks you for your affirmative response. You are correct that the term Applicable Entity is not defined in the NERC Glossary of Terms but it is defined within this standard in Requirement R1 Part 1.1.

**Oshani Pathirane - Oshani Pathirane On Behalf of: Paul Malozewski, Hydro One Networks, Inc., 1, 3**

| | |
|---|---|
| **Selected Answer:** | No |
| **Answer Comment:** | Hydro One Networks Inc. suggests that the wording "applicable entity in its area" (R1), and "applicable Regional Entity" (R3) be revised to add more clarity.<br>With regards to use of the term "applicable entity", the term is further defined in Requirement R1 Part 1.1.<br>The term "applicable Regional Entity" is referencing the requesting Regional Entity.<br><br>The current wording is also ambiguous in specifying what data is required, and the requirement may be left open to any requests for data collection. For clarity, the standard should also specify minimum requirements.<br>The data that may be requested under this standard is defined and bounded in Requirement R1. "Any or all" of the data in Requirement R1 Part 1.3 through Part 1.5 may be requested. Relating to the minimum requirement, there is no requirement to collect data if it is not determined to be necessary by the requesting entity.<br><br>Further, the standard's applicability to Load Serving Entities should be removed, given NERC's intention to remove this functional entity from its list of available functional registrations.<br>The deactivation of the LSE registration is not final at this point in time. When and if the deactivation occurs all standards that are applicable to an LSE will be re-evaluated. |

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable**

**Group Name:** ACES Standards Collaborators

| Group Member Name | Entity | Region | Segments |
|---|---|---|---|
| Bob Solomon | Hoosier Energy Rural Electric Cooperative, Inc. | RFC | 1 |
| Ginger Mercier | Prairie Power, Inc. | SERC | 1,3 |
| Bill Hutchison | Southern Illinois Power Cooperative | SERC | 1 |
| Michael Brytowski | Great River Energy | MRO | 1,3,5,6 |
| John Shaver | Arizona Electric Power Cooperative, Inc. | WECC | 4,5 |
| John Shaver | Southwest Transmission Cooperative, Inc. | WECC | 1 |
| Bill Watson | Old Dominion Electric Cooperative | SERC | 3,4 |
| Shari Heino | Brazos Electric Power Cooperative, Inc. | TRE | 1,5 |
| Chip Koloini | Golden Spread Electric Cooperative, Inc. | SPP | 5 |

**Selected Answer:** Yes

| | |
|---|---|
| **Answer Comment:** | We appreciate the SDT's efforts on clarifying the obligations to provide data to Regional Entities and the obligations of an applicable entity upon receipt of a data request seeking confidential information. We agree the proposed modifications provide sufficient clarity.<br>The SDT thanks you for your affirmative response. |
| **Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC** | |
| **Selected Answer:** | Yes |

**End of Report**

## Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

### Description of Current Draft

This is the first posting of the proposed revised standard. This proposed draft standard will be posted for a 45-day comment period and 10-day initial ballot.

| Completed Actions | Date |
|---|---|
| Standards Committee approved SAR for posting | April 15, 2015 |
| SAR posted for a 30-day informal comment period | April 16, 2015 |

| Anticipated Actions | Date |
|---|---|
| 45-day formal comment period with initial ballot | August/September 2015 |
| Final ballot | October 2015 |
| NERC Board adoption | November 2015 |

## New or Modified Terms Used in NERC Reliability Standards

This section includes all new or modified terms used in the proposed standard that will be included in the *Glossary of Terms Used in NERC Reliability Standards* upon applicable regulatory approval. Terms used in the proposed standard that are already defined and are not being modified can be found in the *Glossary of Terms Used in NERC Reliability Standards*. The new or revised terms listed below will be presented for approval with the proposed standard.

**Term:** None

## A. Introduction

1. **Title: Demand and Energy Data**

2. **Number: MOD-031-2**

3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

4. **Applicability:**

   **4.1. Functional Entities:**

   **4.1.1** Planning Authority and Planning Coordinator (hereafter collectively referred to as the "Planning Coordinator")

   This proposed standard combines "Planning Authority" with "Planning Coordinator" in the list of applicable functional entities. The NERC Functional Model lists "Planning Coordinator" while the registration criteria list "Planning Authority," and they are not yet synchronized. Until that occurs, the proposed standard applies to both "Planning Authority" and "Planning Coordinator."

   **4.1.2** Transmission Planner

   **4.1.3** Balancing Authority

   **4.1.4** Resource Planner

   **4.1.5** Load-Serving Entity

   **4.1.6** Distribution Provider

5. **Effective Date**

   **5.1.** See the MOD-031-2 Implementation Plan.

6. **Background:**

   To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

   The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management

performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## B. Requirements and Measures

**R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data ("Applicable Entities").

**1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).

**1.3.** A request to provide any or all of the following actual data, as necessary:

**1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.

**1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.

**1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.

**1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.

**1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any,

activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

**1.4.** A request to provide any or all of the following forecast data, as necessary:

**1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.

**1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.

**1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.

**1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.

**1.4.5.** Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.

**1.5.** A request to provide any or all of the following summary explanations, as necessary,:

**1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.

**1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.

**1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.

**1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.

**R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.

**R3.** The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**Rationale for R4:** This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

**R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or

otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- shall not be required to alter the format in which it maintains or uses the data;
- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; unless providing the requested data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements

**4.1.** If the Applicable Entity does not provide data requested because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the requesting entity specifying the data that is not being provided and on what basis.

**M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

#### 1.4. Additional Compliance Information

None

## Table of Compliance Elements

| R # | Time Horizon | VRF | Violation Severity Levels | | | |
|---|---|---|---|---|---|---|
| | | | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1 | Long-term Planning | Medium | N/A | N/A | N/A | The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data. |
| R2 | Long-term Planning | Medium | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5 |

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|---|---|---|---|---|---|---|
| | | | did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. |
| R3 | Long-term Planning | Medium | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 75 days | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 80 days | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 85 days | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data requested prior to 91 days |

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|---|---|---|---|---|---|---|
| | | | from the date of request but prior to 81 days from the date of the request. | from the date of request but prior to 86 days from the date of the request. | from the date of request but prior to 91 days from the date of the request. | or more from the date of the request. |
| R4 | Long-term Planning | Medium | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written resquest. | The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written resquest. |

## D. Regional Variances

None.

## E. Interpretations

None.

## F. Associated Documents

None.

## Version History

| Version | Date | Action | Change Tracking |
|---|---|---|---|
| 1 | May 6, 2014 | Adopted by the NERC Board of Trustees. | |
| 1 | February 19, 2015 | FERC order approving MOD-031-1 | |
| | | | |

## Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

**Rationale for R1:**

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

**Rationale for R2:**

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

**Rationale for R3:**

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

**Rationale for R4:**

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the provisions outlined in Requirement R4 below. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

## Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

### Description of Current Draft

This is the first posting of the proposed revised standard. This proposed draft standard will be posted for a 45-day comment period and 10-day initial ballot.

| Completed Actions | Date |
|---|---|
| Standards Committee approved SAR for posting | April 15, 2015 |
| SAR posted for a 30-day informal comment period | April 16, 2015 |

| Anticipated Actions | Date |
|---|---|
| 45-day formal comment period with initial ballot | August/September 2015 |
| Final ballot | October 2015 |
| NERC Board adoption | November 2015 |

## New or Modified Terms Used in NERC Reliability Standards

This section includes all new or modified terms used in the proposed standard that will be included in the *Glossary of Terms Used in NERC Reliability Standards* upon applicable regulatory approval. Terms used in the proposed standard that are already defined and are not being modified can be found in the *Glossary of Terms Used in NERC Reliability Standards*. The new or revised terms listed below will be presented for approval with the proposed standard.

**Term:** None

## A. Introduction

1. **Title: Demand and Energy Data**

2. **Number: MOD-031-2**

3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

4. **Applicability:**

   **4.1. Functional Entities:**

   **4.1.1** Planning Authority and Planning Coordinator (hereafter collectively referred to as the "Planning Coordinator")

   This proposed standard combines "Planning Authority" with "Planning Coordinator" in the list of applicable functional entities. The NERC Functional Model lists "Planning Coordinator" while the registration criteria list "Planning Authority," and they are not yet synchronized. Until that occurs, the proposed standard applies to both "Planning Authority" and "Planning Coordinator."

   **4.1.2** Transmission Planner

   **4.1.3** Balancing Authority

   **4.1.4** Resource Planner

   **4.1.5** Load-Serving Entity

   **4.1.6** Distribution Provider

5. **Effective Date**

   **5.1.** See the MOD-031-2 Implementation Plan.

6. **Background:**

   To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

   The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management

performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## B. Requirements and Measures

**R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data ("Applicable Entities").

**1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).

**1.3.** A request to provide any or all of the following actual data, as necessary:

**1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.

**1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.

**1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.

**1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.

**1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any,

activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

**1.4.** A request to provide any or all of the following forecast data, as necessary:

**1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.

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**1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.

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**1.5.** A request to provide any or all of the following summary explanations, as necessary,:

**1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.

**1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.

**1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.

**1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.

**R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.

**R3.** The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

**M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**Rationale for R4:** This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

**R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or

otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- shall not be required to alter the format in which it maintains or uses the data;
- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; ~~and~~unless providing
- ~~shall not be required to provide any~~the requested data ~~that, if provided,~~ would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements~~; and~~
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**M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

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The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

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If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

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| | | | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1 | Long-term Planning | Medium | N/A | N/A | N/A | The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data. |
| R2 | Long-term Planning | Medium | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part | The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5 |

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|---|---|---|---|---|---|---|
| | | | did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | 1.4.1 through part 1.4.5<br>OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. | OR<br>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2. |
| R3 | Long-term Planning | Medium | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested~~collected~~ | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested~~collected~~ | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested~~collected~~ | The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data requested~~collected under Requirement R2~~ prior to 91 |

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| | | | ~~under Requirement R2~~, but did so after 75 days from the date of request but prior to 81 days from the date of the request. | ~~under Requirement R2~~, but did so after 80 days from the date of request but prior to 86 days from the date of the request. | ~~under Requirement R2~~, but did so after 85 days from the date of request but prior to 91 days from the date of the request. | days or more from the date of the request. |
| R4 | Long-term Planning | Medium | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written resquest. | The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written resquest. | The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request<br><br>OR<br><br>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written resquest. |

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## D. Regional Variances

None.

## E. Interpretations

None.

## F. Associated Documents

None.

## Version History

| Version | Date | Action | Change Tracking |
|---|---|---|---|
| 1 | May 6, 2014 | Adopted by the NERC Board of Trustees. | |
| 1 | February 19, 2015 | FERC order approving MOD-031-1 | |
| | | | |

## Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

**Rationale for R1:**

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

**Rationale for R2:**

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

**Rationale for R3:**

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

**Rationale for R4:**

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the provisions outlined in Requirement R4 below. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

# Implementation Plan

## Project 2010-04.1 Demand and Energy Data

**Implementation Plan for MOD-031-2 – Demand and Energy Data**

***Approvals Required***
MOD-031-2 – Demand and Energy Data

***Prerequisite Approvals***
There are no other standards that must receive approval prior to the approval of this standard.

***Revisions to Glossary Terms***

**N/A**

***Applicable Entities***

Planning Coordinator and Planning Authority

Transmission Planner

Resource Planner

Balancing Authority

Load-Serving Entity

Distribution Provider

***Applicable Facilities***
N/A

***Conforming Changes to Other Standards***
None

***Effective Dates***

MOD-031-2 shall become effective as follows:

The later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is

required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

***Justification***

The six-month implementation period will provide sufficient time for the applicable entities to develop the necessary process to implement this standard.

***Retirements***

MOD-031-1 shall be retired at 11:59:59 p.m. of the day immediately prior to the effective date of MOD-031-2 in the particular jurisdiction in which the new standard is becoming effective.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

# Standards Announcement

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2

**Final Ballot Open through October 15, 2015**

**Now Available**

A final ballot for **MOD-031-2 – Demand and Energy Data** is open through **8 p.m. Eastern, Thursday, October 15, 2015.**

### Balloting

In the final ballot, votes are counted by exception. Only members of the ballot pool may cast a vote. All ballot pool members may change their previously cast vote. A ballot pool member who failed to vote during the previous ballot period may vote in the final ballot period. If a ballot pool member does not participate in the final ballot, the member's vote from the previous ballot will be carried over as their vote in the final ballot.

Members of the ballot pool associated with this project may log in and submit their vote for the standard here. If you experience any difficulties using the Standards Balloting & Commenting System (SBS), contact Wendy Muller.

*If you are having difficulty accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out, contact NERC IT support directly at ERO helpdesk@nerc.net (Monday – Friday, 8 a.m. - 8 p.m. Eastern).*

### Next Steps

The voting results for the standard will be posted and announced after the ballot closes. If approved, the standard will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

### Standards Development Process

For more information on the Standards Development Process, refer to the Standard Processes Manual.

For more information or assistance, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

# Standards Announcement

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2

### Final Ballot Results

**Now Available**

A final ballot for **MOD-031-2 – Demand and Energy Data** concluded **8 p.m. Eastern, Thursday, October 15, 2015.**

The standard received sufficient affirmative votes for approval. Voting statistics are listed below, and the Ballot Results page provides detailed results for the ballot.

| Ballot |
|---|
| **Quorum / Approval** |
| 89.60% / 90.01% |

### Next Steps

The standard will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

### Standards Development Process

For more information on the Standards Development Process, refer to the Standard Processes Manual.

For more information or assistance, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

# *BALLOT RESULTS*

**Ballot Name:** 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 FN 2 ST
**Voting Start Date:** 10/6/2015 12:17:53 PM
**Voting End Date:** 10/15/2015 8:00:00 PM
**Ballot Type:** ST
**Ballot Activity:** FN
**Ballot Series:** 2
**Total # Votes:** 267
**Total Ballot Pool:** 298
**Quorum:** 89.6
**Weighted Segment Value:** 90.01

| Segment | Ballot Pool | Segment Weight | Affirmative Votes | Affirmative Fraction | Negative Votes w/ Comment | Negative Fraction w/ Comment | Negative Votes w/o Comment | Abstain | No Vote |
|---|---|---|---|---|---|---|---|---|---|
| Segment: 1 | 76 | 1 | 58 | 0.935 | 4 | 0.065 | 0 | 7 | 7 |
| Segment: 2 | 9 | 0.9 | 8 | 0.8 | 1 | 0.1 | 0 | 0 | 0 |
| Segment: 3 | 68 | 1 | 52 | 0.897 | 6 | 0.103 | 0 | 3 | 7 |
| Segment: 4 | 26 | 1 | 16 | 0.762 | 5 | 0.238 | 0 | 1 | 4 |
| Segment: 5 | 67 | 1 | 52 | 0.963 | 2 | 0.037 | 0 | 3 | 10 |
| Segment: 6 | 41 | 1 | 34 | 0.944 | 2 | 0.056 | 0 | 2 | 3 |
| Segment: 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Segment: 8 | 1 | 0.1 | 1 | 0.1 | 0 | 0 | 0 | 0 | 0 |
| Segment: 9 | 2 | 0.2 | 1 | 0.1 | 1 | 0.1 | 0 | 0 | 0 |

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| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Segment: 10 | 8 | 0.8 | 8 | 0.8 | 0 | 0 | 0 | 0 | 0 |
| Totals: | 298 | 7 | 230 | 6.301 | 21 | 0.699 | 0 | 16 | 31 |

## *BALLOT POOL MEMBERS*

Show All entries Search: Search

| Segment | Organization | Voter | Designated Proxy | Ballot | NERC Memo |
|---|---|---|---|---|---|
| 1 | Ameren - Ameren Services | Eric Scott | | None | N/A |
| 1 | American Transmission Company, LLC | Andrew Pusztai | | Abstain | N/A |
| 1 | APS - Arizona Public Service Co. | Michelle Amarantos | | Affirmative | N/A |
| 1 | Associated Electric Cooperative, Inc. | Phil Hart | | Affirmative | N/A |
| 1 | Avista - Avista Corporation | Bryan Cox | Rich Hydzik | Affirmative | N/A |
| 1 | Balancing Authority of Northern California | Kevin Smith | Joe Tarantino | Affirmative | N/A |
| 1 | BC Hydro and Power Authority | Patricia Robertson | | Affirmative | N/A |
| 1 | Beaches Energy Services | Don Cuevas | | Negative | N/A |
| 1 | Berkshire Hathaway Energy - MidAmerican Energy Co. | Terry Harbour | | Affirmative | N/A |
| 1 | Black Hills Corporation | Wes Wingen | | Abstain | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 1 | Bonneville Power Administration | Donald Watkins | | Affirmative | N/A |
| 1 | Brazos Electric Power Cooperative, Inc. | Tony Kroskey | | None | N/A |
| 1 | Bryan Texas Utilities | John Fontenot | | Affirmative | N/A |
| 1 | CenterPoint Energy Houston Electric, LLC | John Brockhan | | Affirmative | N/A |
| 1 | Central Electric Power Cooperative (Missouri) | Michael Bax | | None | N/A |
| 1 | Cleco Corporation | John Lindsey | Louis Guidry | Affirmative | N/A |
| 1 | Con Ed - Consolidated Edison Co. of New York | Chris de Graffenried | | Affirmative | N/A |
| 1 | Dairyland Power Cooperative | Robert Roddy | | Affirmative | N/A |
| 1 | Dominion - Dominion Virginia Power | Larry Nash | | Affirmative | N/A |
| 1 | Duke Energy | Doug Hils | | Affirmative | N/A |
| 1 | Edison International - Southern California Edison Company | Steven Mavis | | Affirmative | N/A |
| 1 | Entergy - Entergy Services, Inc. | Oliver Burke | | Affirmative | N/A |
| 1 | Exelon | Chris Scanlon | | Affirmative | N/A |
| 1 | FirstEnergy - FirstEnergy Corporation | William Smith | | Affirmative | N/A |
| 1 | Georgia Transmission Corporation | Jason Snodgrass | | Affirmative | N/A |
| 1 | Great Plains Energy - Kansas City Power and Light Co. | James McBee | Douglas Webb | Affirmative | N/A |
| 1 | Great River Energy | Gordon Pietsch | | Affirmative | N/A |
| 1 | Hoosier Energy Rural Electric Cooperative, Inc. | Bob Solomon | | None | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 1 | Hydro One Networks, Inc. | Payam Farahbakhsh | | Abstain | N/A |
| 1 | Hydro-Qu?bec TransEnergie | Martin Boisvert | | Affirmative | N/A |
| 1 | IDACORP - Idaho Power Company | Laura Nelson | | Affirmative | N/A |
| 1 | International Transmission Company Holdings Corporation | Michael Moltane | Meghan Ferguson | Abstain | N/A |
| 1 | KAMO Electric Cooperative | Walter Kenyon | | Affirmative | N/A |
| 1 | Los Angeles Department of Water and Power | faranak sarbaz | | Affirmative | N/A |
| 1 | Lower Colorado River Authority | Teresa Cantwell | | Abstain | N/A |
| 1 | M and A Electric Power Cooperative | William Price | | Affirmative | N/A |
| 1 | Manitoba Hydro | Mike Smith | | Affirmative | N/A |
| 1 | MEAG Power | David Weekley | Scott Miller | Affirmative | N/A |
| 1 | Muscatine Power and Water | Andy Kurriger | | Affirmative | N/A |
| 1 | National Grid USA | Michael Jones | | Affirmative | N/A |
| 1 | NB Power Corporation | Alan MacNaughton | | Affirmative | N/A |
| 1 | Nebraska Public Power District | Jamison Cawley | | Affirmative | N/A |
| 1 | New York Power Authority | Salvatore Spagnolo | | None | N/A |
| 1 | NextEra Energy - Florida Power and Light Co. | Mike ONeil | | Affirmative | N/A |
| 1 | NiSource - Northern Indiana Public Service Co. | Charles Raney | | Affirmative | N/A |
| 1 | Northeast Missouri Electric Power | Kevin White | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | Cooperative | | | | |
| 1 | NorthWestern Energy | Belinda Tierney | | None | N/A |
| 1 | OGE Energy - Oklahoma Gas and Electric Co. | Terri Pyle | | Negative | N/A |
| 1 | Oncor Electric Delivery | Rod Kinard | Gul Khan | Affirmative | N/A |
| 1 | OTP - Otter Tail Power Company | Charles Wicklund | | Affirmative | N/A |
| 1 | Peak Reliability | Jared Shakespeare | | Abstain | N/A |
| 1 | PHI - Potomac Electric Power Co. | David Thorne | | Affirmative | N/A |
| 1 | Platte River Power Authority | John Collins | | Affirmative | N/A |
| 1 | PNM Resources - Public Service Company of New Mexico | Laurie Williams | | Affirmative | N/A |
| 1 | PPL Electric Utilities Corporation | Brenda Truhe | | Abstain | N/A |
| 1 | PSEG - Public Service Electric and Gas Co. | Joseph Smith | | Affirmative | N/A |
| 1 | Public Utility District No. 1 of Snohomish County | Long Duong | | Affirmative | N/A |
| 1 | Public Utility District No. 2 of Grant County, Washington | Michiko Sell | | Negative | N/A |
| 1 | Sacramento Municipal Utility District | Tim Kelley | Joe Tarantino | Affirmative | N/A |
| 1 | Salt River Project | Steven Cobb | | Affirmative | N/A |
| 1 | Santee Cooper | Shawn Abrams | | Affirmative | N/A |
| 1 | SCANA - South Carolina Electric and Gas Co. | Tom Hanzlik | | Affirmative | N/A |
| 1 | Seattle City Light | Pawel Krupa | | Affirmative | N/A |
| 1 | Seminole Electric Cooperative, Inc. | Mark Churilla | Bret Galbraith | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 1 | Sho-Me Power Electric Cooperative | Denise Stevens | | Affirmative | N/A |
| 1 | Southern Company - Southern Company Services, Inc. | Robert A. Schaffeld | | Affirmative | N/A |
| 1 | Southwest Transmission Cooperative, Inc. | John Shaver | | Negative | N/A |
| 1 | Tacoma Public Utilities (Tacoma, WA) | John Merrell | | Affirmative | N/A |
| 1 | Tallahassee Electric (City of Tallahassee, FL) | Scott Langston | | Affirmative | N/A |
| 1 | Tennessee Valley Authority | Howell Scott | | Affirmative | N/A |
| 1 | Tri-State G and T Association, Inc. | Tracy Sliman | | Affirmative | N/A |
| 1 | Unisource - Tucson Electric Power Co. | John Tolo | | Affirmative | N/A |
| 1 | United Illuminating Co. | Jonathan Appelbaum | | Affirmative | N/A |
| 1 | Westar Energy | Kevin Giles | | Affirmative | N/A |
| 1 | Western Area Power Administration | Steve Johnson | | None | N/A |
| 1 | Xcel Energy, Inc. | Dean Schiro | | Affirmative | N/A |
| 2 | BC Hydro and Power Authority | Venkataramakrishnan Vinnakota | | Affirmative | N/A |
| 2 | California ISO | Richard Vine | | Affirmative | N/A |
| 2 | Electric Reliability Council of Texas, Inc. | Elizabeth Axson | | Negative | N/A |
| 2 | Herb Schrayshuen | Herb Schrayshuen | | Affirmative | N/A |
| 2 | Independent Electricity System Operator | Leonard Kula | | Affirmative | N/A |
| 2 | ISO New England, Inc. | Michael Puscas | John Pearson | Affirmative | N/A |
| 2 | Midcontinent ISO, Inc. | Terry BIlke | | Affirmative | N/A |
| 2 | New York | Gregory Campoli | | Affirmative | N/A |

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|---|---|---|---|---|---|
| | Independent System Operator | | | | |
| 2 | PJM Interconnection, L.L.C. | Mark Holman | | Affirmative | N/A |
| 3 | Ameren - Ameren Services | David Jendras | | None | N/A |
| 3 | Anaheim Public Utilities Dept. | Dennis Schmidt | | Affirmative | N/A |
| 3 | APS - Arizona Public Service Co. | Jeri Freimuth | | Affirmative | N/A |
| 3 | Associated Electric Cooperative, Inc. | Todd Bennett | | Affirmative | N/A |
| 3 | Austin Energy | Lisa Martin | | Affirmative | N/A |
| 3 | Avista - Avista Corporation | Scott Kinney | | Affirmative | N/A |
| 3 | Basin Electric Power Cooperative | Jeremy Voll | | Affirmative | N/A |
| 3 | BC Hydro and Power Authority | Pat Harrington | | Affirmative | N/A |
| 3 | Beaches Energy Services | Steven Lancaster | | Negative | N/A |
| 3 | Berkshire Hathaway Energy - MidAmerican Energy Co. | Thomas Mielnik | Darnez Gresham | Affirmative | N/A |
| 3 | Bonneville Power Administration | Rebecca Berdahl | | Affirmative | N/A |
| 3 | Central Electric Power Cooperative (Missouri) | Adam Weber | | Affirmative | N/A |
| 3 | City of Green Cove Springs | Mark Schultz | | Negative | N/A |
| 3 | City of Leesburg | Chris Adkins | | Negative | N/A |
| 3 | Clark Public Utilities | Jack Stamper | | Affirmative | N/A |
| 3 | CMS Energy - Consumers Energy Company | Karl Blaszkowski | | Affirmative | N/A |
| 3 | Colorado Springs | Charles Morgan | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | Utilities | | | | |
| 3 | Con Ed - Consolidated Edison Co. of New York | Peter Yost | | Affirmative | N/A |
| 3 | Dominion - Dominion Resources, Inc. | Connie Lowe | | Affirmative | N/A |
| 3 | DTE Energy - Detroit Edison Company | Kent Kujala | | Affirmative | N/A |
| 3 | Duke Energy | Lee Schuster | | Affirmative | N/A |
| 3 | Edison International - Southern California Edison Company | Romel Aquino | | Affirmative | N/A |
| 3 | Exelon | John Bee | | Affirmative | N/A |
| 3 | FirstEnergy - FirstEnergy Corporation | Theresa Ciancio | | Affirmative | N/A |
| 3 | Florida Municipal Power Agency | Joe McKinney | | Negative | N/A |
| 3 | Georgia System Operations Corporation | Scott McGough | | Affirmative | N/A |
| 3 | Grand River Dam Authority | Jeff Wells | | Abstain | N/A |
| 3 | Great Plains Energy - Kansas City Power and Light Co. | Jessica Tucker | Douglas Webb | Affirmative | N/A |
| 3 | Great River Energy | Brian Glover | | Affirmative | N/A |
| 3 | Hydro One Networks, Inc. | Paul Malozewski | Oshani Pathirane | Abstain | N/A |
| 3 | JEA | Garry Baker | | None | N/A |
| 3 | KAMO Electric Cooperative | Ted Hilmes | | Affirmative | N/A |
| 3 | Lakeland Electric | David Hadzima | | Negative | N/A |
| 3 | Lincoln Electric System | Jason Fortik | | Affirmative | N/A |
| 3 | Los Angeles Department of Water | Mike Anctil | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| | and Power | | | | |
| 3 | M and A Electric Power Cooperative | Stephen Pogue | | Affirmative | N/A |
| 3 | Manitoba Hydro | Karim Abdel-Hadi | | Affirmative | N/A |
| 3 | MEAG Power | Roger Brand | Scott Miller | Affirmative | N/A |
| 3 | Muscatine Power and Water | Seth Shoemaker | | Affirmative | N/A |
| 3 | National Grid USA | Brian Shanahan | | Affirmative | N/A |
| 3 | Nebraska Public Power District | Tony Eddleman | | Affirmative | N/A |
| 3 | New York Power Authority | David Rivera | | Affirmative | N/A |
| 3 | NiSource - Northern Indiana Public Service Co. | Ramon Barany | | Affirmative | N/A |
| 3 | Northeast Missouri Electric Power Cooperative | Skyler Wiegmann | | Affirmative | N/A |
| 3 | OGE Energy - Oklahoma Gas and Electric Co. | Donald Hargrove | | Negative | N/A |
| 3 | PHI - Potomac Electric Power Co. | Mark Yerger | | Affirmative | N/A |
| 3 | PNM Resources | Michael Mertz | | None | N/A |
| 3 | PPL - Louisville Gas and Electric Co. | Charles Freibert | | Abstain | N/A |
| 3 | PSEG - Public Service Electric and Gas Co. | Jeffrey Mueller | | Affirmative | N/A |
| 3 | Public Utility District No. 1 of Okanogan County | Dale Dunckel | | None | N/A |
| 3 | Puget Sound Energy, Inc. | Andrea Basinski | | None | N/A |
| 3 | Sacramento Municipal Utility District | Rachel Moore | Joe Tarantino | Affirmative | N/A |
| 3 | Salt River Project | John Coggins | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 3 | Santee Cooper | James Poston | | Affirmative | N/A |
| 3 | SCANA - South Carolina Electric and Gas Co. | Clay Young | | None | N/A |
| 3 | Seattle City Light | Dana Wheelock | | Affirmative | N/A |
| 3 | Seminole Electric Cooperative, Inc. | James Frauen | | Affirmative | N/A |
| 3 | Sho-Me Power Electric Cooperative | Jeff Neas | | Affirmative | N/A |
| 3 | Snohomish County PUD No. 1 | Mark Oens | | Affirmative | N/A |
| 3 | Southern Company - Alabama Power Company | R. Scott Moore | | Affirmative | N/A |
| 3 | Tacoma Public Utilities (Tacoma, WA) | Marc Donaldson | | Affirmative | N/A |
| 3 | Tallahassee Electric (City of Tallahassee, FL) | John Williams | | Affirmative | N/A |
| 3 | TECO - Tampa Electric Co. | Ronald Donahey | | None | N/A |
| 3 | Tennessee Valley Authority | Ian Grant | | Affirmative | N/A |
| 3 | Tri-State G and T Association, Inc. | Janelle Marriott Gill | | Affirmative | N/A |
| 3 | WEC Energy Group, Inc. | James Keller | | Affirmative | N/A |
| 3 | Westar Energy | Bo Jones | | Affirmative | N/A |
| 3 | Xcel Energy, Inc. | Michael Ibold | | Affirmative | N/A |
| 4 | Alliant Energy Corporation Services, Inc. | Kenneth Goldsmith | | Affirmative | N/A |
| 4 | Austin Energy | Tina Garvey | | Affirmative | N/A |
| 4 | Blue Ridge Power Agency | Duane Dahlquist | | None | N/A |
| 4 | City of Clewiston | Lynne Mila | | Negative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 4 | City of New Smyrna Beach Utilities Commission | Tim Beyrle | | Negative | N/A |
| 4 | City of Redding | Nick Zettel | Bill Hughes | Affirmative | N/A |
| 4 | CMS Energy - Consumers Energy Company | Julie Hegedus | | None | N/A |
| 4 | DTE Energy - Detroit Edison Company | Daniel Herring | | Affirmative | N/A |
| 4 | FirstEnergy - Ohio Edison Company | Doug Hohlbaugh | | Affirmative | N/A |
| 4 | Florida Municipal Power Agency | Carol Chinn | | Negative | N/A |
| 4 | Georgia System Operations Corporation | Guy Andrews | | Affirmative | N/A |
| 4 | Illinois Municipal Electric Agency | Bob Thomas | | Affirmative | N/A |
| 4 | Keys Energy Services | Stanley Rzad | | Negative | N/A |
| 4 | MGE Energy - Madison Gas and Electric Co. | Joseph DePoorter | | Affirmative | N/A |
| 4 | Modesto Irrigation District | Spencer Tacke | | None | N/A |
| 4 | Municipal Energy Agency of Nebraska | Robin Spady | | Abstain | N/A |
| 4 | Oklahoma Municipal Power Authority | Ashley Stringer | | Affirmative | N/A |
| 4 | Public Utility District No. 1 of Snohomish County | John Martinsen | | Affirmative | N/A |
| 4 | Public Utility District No. 2 of Grant County, Washington | Yvonne McMackin | | Negative | N/A |
| 4 | Sacramento Municipal Utility District | Michael Ramirez | Joe Tarantino | Affirmative | N/A |
| 4 | Seattle City Light | Hao Li | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 4 | Seminole Electric Cooperative, Inc. | Michael Ward | | Affirmative | N/A |
| 4 | South Mississippi Electric Power Association | Steve McElhaney | | None | N/A |
| 4 | Tacoma Public Utilities (Tacoma, WA) | Hien Ho | | Affirmative | N/A |
| 4 | Utility Services, Inc. | Brian Evans-Mongeon | | Affirmative | N/A |
| 4 | WEC Energy Group, Inc. | Anthony Jankowski | | Affirmative | N/A |
| 5 | AEP | Thomas Foltz | | Affirmative | N/A |
| 5 | Ameren - Ameren Missouri | Sam Dwyer | | None | N/A |
| 5 | APS - Arizona Public Service Co. | Stephanie Little | | Affirmative | N/A |
| 5 | Austin Energy | Jeanie Doty | | Affirmative | N/A |
| 5 | Avista - Avista Corporation | Steve Wenke | | None | N/A |
| 5 | Basin Electric Power Cooperative | Mike Kraft | | None | N/A |
| 5 | BC Hydro and Power Authority | Clement Ma | | Affirmative | N/A |
| 5 | Boise-Kuna Irrigation District - Lucky Peak Power Plant Project | Mike Kukla | | Affirmative | N/A |
| 5 | Bonneville Power Administration | Francis Halpin | | Affirmative | N/A |
| 5 | Brazos Electric Power Cooperative, Inc. | Shari Heino | | Affirmative | N/A |
| 5 | Calpine Corporation | Hamid Zakery | | Affirmative | N/A |
| 5 | Choctaw Generation Limited Partnership, LLLP | Rob Watson | | Affirmative | N/A |
| 5 | City and County of San Francisco | Daniel Mason | | Affirmative | N/A |
| 5 | City of Independence, Power and Light | Jim Nail | | Affirmative | N/A |

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|---|---|---|---|---|---|
| | Department | | | | |
| 5 | City of Redding | Paul Cummings | Bill Hughes | Affirmative | N/A |
| 5 | Cleco Corporation | Stephanie Huffman | Louis Guidry | Affirmative | N/A |
| 5 | CMS Energy - Consumers Energy Company | David Greyerbiehl | | Affirmative | N/A |
| 5 | Con Ed - Consolidated Edison Co. of New York | Brian O'Boyle | | Affirmative | N/A |
| 5 | Dairyland Power Cooperative | Tommy Drea | | Affirmative | N/A |
| 5 | Dominion - Dominion Resources, Inc. | Randi Heise | | Affirmative | N/A |
| 5 | DTE Energy - Detroit Edison Company | Jeffrey DePriest | | Affirmative | N/A |
| 5 | Duke Energy | Dale Goodwine | | Affirmative | N/A |
| 5 | Edison International - Southern California Edison Company | Michael McSpadden | | Affirmative | N/A |
| 5 | Entergy - Entergy Services, Inc. | Tracey Stubbs | | Affirmative | N/A |
| 5 | Exelon | Vince Catania | | Affirmative | N/A |
| 5 | FirstEnergy - FirstEnergy Solutions | Robert Loy | | None | N/A |
| 5 | Florida Municipal Power Agency | David Schumann | | Negative | N/A |
| 5 | Great Plains Energy - Kansas City Power and Light Co. | Harold Wyble | Douglas Webb | Affirmative | N/A |
| 5 | Great River Energy | Preston Walsh | | Affirmative | N/A |
| 5 | Hydro-Qu?bec Production | Roger Dufresne | | Affirmative | N/A |
| 5 | JEA | John Babik | | Affirmative | N/A |
| 5 | Lakeland Electric | Jim Howard | | None | N/A |
| 5 | Lincoln Electric | Kayleigh Wilkerson | | Affirmative | N/A |

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|---|---|---|---|---|---|
| | System | | | | |
| 5 | Los Angeles Department of Water and Power | Kenneth Silver | | Affirmative | N/A |
| 5 | Lower Colorado River Authority | Dixie Wells | | Abstain | N/A |
| 5 | Luminant - Luminant Generation Company LLC | Rick Terrill | | None | N/A |
| 5 | Manitoba Hydro | Yuguang Xiao | | Affirmative | N/A |
| 5 | Massachusetts Municipal Wholesale Electric Company | David Gordon | | Abstain | N/A |
| 5 | MEAG Power | Steven Grego | Scott Miller | Affirmative | N/A |
| 5 | Muscatine Power and Water | Mike Avesing | | Affirmative | N/A |
| 5 | NB Power Corporation | Rob Vance | | Affirmative | N/A |
| 5 | Nebraska Public Power District | Don Schmit | | Affirmative | N/A |
| 5 | New York Power Authority | Wayne Sipperly | | Affirmative | N/A |
| 5 | NextEra Energy | Allen Schriver | | Affirmative | N/A |
| 5 | NiSource - Northern Indiana Public Service Co. | Michael Melvin | | Affirmative | N/A |
| 5 | OGE Energy - Oklahoma Gas and Electric Co. | Leo Staples | | Negative | N/A |
| 5 | Oglethorpe Power Corporation | Bernard Johnson | | Affirmative | N/A |
| 5 | Omaha Public Power District | Mahmood Safi | | Affirmative | N/A |
| 5 | OTP - Otter Tail Power Company | Cathy Fogale | | Affirmative | N/A |
| 5 | Pacific Gas and Electric Company | Alex Chua | | None | N/A |
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|---|---|---|---|---|---|
| 5 | Platte River Power Authority | Tyson Archie | | Affirmative | N/A |
| 5 | PPL Electric Utilities Corporation | Dan Wilson | | Abstain | N/A |
| 5 | PSEG - PSEG Fossil LLC | Tim Kucey | | Affirmative | N/A |
| 5 | Public Utility District No. 1 of Snohomish County | Sam Nietfeld | | Affirmative | N/A |
| 5 | Public Utility District No. 2 of Grant County, Washington | Alex Ybarra | | Affirmative | N/A |
| 5 | Puget Sound Energy, Inc. | Lynda Kupfer | | None | N/A |
| 5 | Sacramento Municipal Utility District | Susan Gill-Zobitz | Joe Tarantino | Affirmative | N/A |
| 5 | Salt River Project | Kevin Nielsen | | Affirmative | N/A |
| 5 | SCANA - South Carolina Electric and Gas Co. | Edward Magic | | None | N/A |
| 5 | Seattle City Light | Mike Haynes | | Affirmative | N/A |
| 5 | Southern Company - Southern Company Generation | William D. Shultz | | Affirmative | N/A |
| 5 | Tacoma Public Utilities (Tacoma, WA) | Chris Mattson | | None | N/A |
| 5 | Tallahassee Electric (City of Tallahassee, FL) | Karen Webb | | Affirmative | N/A |
| 5 | Tennessee Valley Authority | Brandy Spraker | | Affirmative | N/A |
| 5 | WEC Energy Group, Inc. | Linda Horn | | Affirmative | N/A |
| 5 | Westar Energy | stephanie johnson | | Affirmative | N/A |
| 5 | Xcel Energy, Inc. | David Lemmons | | Affirmative | N/A |
| 6 | Ameren - Ameren Services | Robert Quinlivan | | None | N/A |

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|---|---|---|---|---|---|
| 6 | APS - Arizona Public Service Co. | Bobbi Welch | | Affirmative | N/A |
| 6 | Associated Electric Cooperative, Inc. | Brian Ackermann | | Affirmative | N/A |
| 6 | Austin Energy | Andrew Gallo | | Affirmative | N/A |
| 6 | Berkshire Hathaway - PacifiCorp | Sandra Shaffer | | Affirmative | N/A |
| 6 | Bonneville Power Administration | Alex Spain | | Affirmative | N/A |
| 6 | City of Redding | Marvin Briggs | Bill Hughes | Affirmative | N/A |
| 6 | Cleco Corporation | Robert Hirchak | Louis Guidry | Affirmative | N/A |
| 6 | Colorado Springs Utilities | Shannon Fair | | Affirmative | N/A |
| 6 | Con Ed - Consolidated Edison Co. of New York | Robert Winston | | Affirmative | N/A |
| 6 | Dominion - Dominion Resources, Inc. | Louis Slade | | Affirmative | N/A |
| 6 | Duke Energy | Greg Cecil | | Affirmative | N/A |
| 6 | Exelon | Dave Carlson | | Affirmative | N/A |
| 6 | FirstEnergy - FirstEnergy Solutions | Ann Ivanc | Richard Hoag | Affirmative | N/A |
| 6 | Florida Municipal Power Agency | Richard Montgomery | | Negative | N/A |
| 6 | Florida Municipal Power Pool | Tom Reedy | | Negative | N/A |
| 6 | Great Plains Energy - Kansas City Power and Light Co. | Chris Bridges | Douglas Webb | Affirmative | N/A |
| 6 | Great River Energy | Donna Stephenson | Michael Brytowski | Affirmative | N/A |
| 6 | Lower Colorado River Authority | Michael Shaw | | Abstain | N/A |
| 6 | Manitoba Hydro | Blair Mukanik | | Affirmative | N/A |
| 6 | Muscatine Power and | Ryan Streck | | Affirmative | N/A |

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|---|---|---|---|---|---|
| | Water | | | | |
| 6 | New York Power Authority | Shivaz Chopra | | Affirmative | N/A |
| 6 | NextEra Energy - Florida Power and Light Co. | Silvia Mitchell | | Affirmative | N/A |
| 6 | NiSource - Northern Indiana Public Service Co. | Joe O'Brien | | Affirmative | N/A |
| 6 | OGE Energy - Oklahoma Gas and Electric Co. | Jerry Nottnagel | | None | N/A |
| 6 | Oglethorpe Power Corporation | Donna Johnson | | Affirmative | N/A |
| 6 | Platte River Power Authority | Carol Ballantine | | Affirmative | N/A |
| 6 | PPL - Louisville Gas and Electric Co. | OELKER LINN | | Abstain | N/A |
| 6 | Sacramento Municipal Utility District | Diane Clark | Joe Tarantino | Affirmative | N/A |
| 6 | Salt River Project | William Abraham | Chris Janick | Affirmative | N/A |
| 6 | Santee Cooper | Michael Brown | | Affirmative | N/A |
| 6 | Seattle City Light | Charles Freeman | | Affirmative | N/A |
| 6 | Seminole Electric Cooperative, Inc. | Trudy Novak | | Affirmative | N/A |
| 6 | Snohomish County PUD No. 1 | Kenn Backholm | | Affirmative | N/A |
| 6 | Southern Company - Southern Company Generation and Energy Marketing | John J. Ciza | | Affirmative | N/A |
| 6 | Tacoma Public Utilities (Tacoma, WA) | Rick Applegate | | Affirmative | N/A |
| 6 | Talen Energy Marketing, LLC | Elizabeth Davis | | Affirmative | N/A |
| 6 | Tennessee Valley Authority | Marjorie Parsons | | Affirmative | N/A |

| | | | | | |
|---|---|---|---|---|---|
| 6 | WEC Energy Group, Inc. | David Hathaway | | None | N/A |
| 6 | Westar Energy | Megan Wagner | | Affirmative | N/A |
| 6 | Xcel Energy, Inc. | Peter Colussy | | Affirmative | N/A |
| 8 | David Kiguel | David Kiguel | | Affirmative | N/A |
| 9 | City of Vero Beach | Ginny Beigel | | Negative | N/A |
| 9 | Commonwealth of Massachusetts Department of Public Utilities | Donald Nelson | | Affirmative | N/A |
| 10 | Florida Reliability Coordinating Council | Peter Heidrich | | Affirmative | N/A |
| 10 | Midwest Reliability Organization | Russel Mountjoy | | Affirmative | N/A |
| 10 | Northeast Power Coordinating Council | Guy V. Zito | | Affirmative | N/A |
| 10 | ReliabilityFirst | Anthony Jablonski | | Affirmative | N/A |
| 10 | SERC Reliability Corporation | David Greene | | Affirmative | N/A |
| 10 | Southwest Power Pool Regional Entity | Bob Reynolds | | Affirmative | N/A |
| 10 | Texas Reliability Entity, Inc. | Rachel Coyne | | Affirmative | N/A |
| 10 | Western Electricity Coordinating Council | Steven Rueckert | | Affirmative | N/A |

Previous 1 Next

Showing 1 to 298 of 298 entries

# Exhibit E

## Standards Drafting Team Roster

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

# Project 2010-04.1 Standards Drafting Team MOD-031-2

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|---|---|---|---|
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| 3 | Brian Glover | Great River Energy | BGlover@GREnergy.com |
| 4 | Robert Emmert | Califiornia ISO (CAISO) | REmmert@caiso.com |
| 5 | Barbara Doland | SERC Reliability Corporation, Inc. | BDoland@serc1.org |
| 6 | Andrey Oks | Northeast Power Coordinating Council, Inc. (NPCC) | aoks@npcc.org |
| 6 | Shamai Elstein | NERC | shamai.elstein@nerc.net |
| 6 | Darrel Richardson | NERC | darrel.richardson@nerc.net |