

Mike Cadwalader comments on the draft Transmission Services Manual:

p. 2-1: In the 2nd para. under Sec. 2.1, it should be "Transmission Congestion Contracts", not "Transmission Congestion Charges".

p. 2-2: The 1st para. states that transmission schedules must be in terms of thousands of kW per hour. I thought I had heard at a recent WG meeting that schedules in terms of tenths of MW could be accepted under SMD2, although someone was going to go back and check. (There are many similar references in Sec. 2.1.3, and section 3.1.3 also includes such requirements when discussing LSEs.)

p. 4-7 & 4-8: Don't items 2 and 3 have to be modified to reflect the elimination of the TSC for exports to NE? (Similarly, the examples beginning on p. 4-10 would need to be changed.)

p. 4-13: Similar comment re applicability of NTAC to exports to NE.

p. 6-9: Delete extraneous "OK".

p. 7-5: In Sec. 7.1.8, reference to RTC should really be a reference to RTC15, since that is the version of RTC that determines schedules for external transactions. Also, the references to dec bids for customers using internal generators to supply exports should be deleted, since (as is explained in Sec. 7.1.9), dec bids are not used for exports.

And the first sentence of Sec. 7.1.9 should be deleted. Dec bids aren't evaluated differently for imports and wheels through than for internal transactions or exports, because that implies that dec bids are evaluated in some manner to determine the schedules for internal transactions and exports, and they're not. However, dec bids can be submitted for the generators designated as sources for those transactions, which will affect the schedules those generators receive, so the wording in this paragraph is a little too broad. Instead, what is now the 3rd sentence in that para. should be modified to state that "Dec bids are not used to determine the schedules associated with internal or export transactions...."

p. 7-6: Under wheels through, delete the part of the last sentence of the first paragraph following the comma. (The concept exists--the manual just described it, after all! It simply isn't being implemented.)

pp. 7-7 and 7-8: While the most extreme (e.g., highest and lowest) bids are reserved for preschedules, which maximizes the chances that prescheduled transactions will be scheduled, there are some circumstances when prescheduled transactions will not be prescheduled while some non-prescheduled transactions will be scheduled. The language in this section glosses over this possibility. I wouldn't get into the details of it, but I would slightly modify a couple of statements. On p. 7-7, the 4th para. of Sec. 7.1.10 states that such a transaction "will be a 'price taker'"; add "generally" after "will". On p. 7-8, the last para. states that prescheduled transactions will be scheduled in the DAM "before other transactions are scheduled"; add "specifying the same POI and POW" after "transactions".

p. 7-24: Delete the last sentence of the 3rd para. of Sec. 7.3.4, since the TRM won't be observed in actual operation, and since the ISO will be observing an operating margin in actual operations, as discussed in the preceding sections. Similarly, delete the last part of the last sentence of the 4th para.