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April 29, 2011

VIA ELECTRONIC/E-TARIFF FILING

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

Re: *Deseret Generation & Transmission Co-operative, Inc.*
Amendment to Section 205 Filing and Request for Partial Waiver of
Order Nos. 729 and 676-E Requirements,
Docket No. ER11-3095-_____

Dear Secretary Bose:

On March 15, 2011, Deseret Generation & Transmission Co-operative, Inc. ("Deseret") submitted a Section 205 filing in the above captioned proceeding, wherein Deseret proposed certain modifications to its Open Access Transmission Tariff ("OATT") to comply with Order Nos. 676-E¹ and 729,² and requesting waiver of the Commission's 60-day prior notice requirements such that the modifications to the OATT have an effective date of April 1, 2011.

Based on recommendations made by Commission Staff, Deseret desires to amend its March 15, 2011 filing and propose additional amendments to Attachment C of its OATT. Additional changes are proposed, as follows:

¹ *Standard for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-E, 74 Fed. Reg. 63,288 (December 3, 2009), 129 FERC ¶ 61,162 (2009) ("Order No. 676-E").

² *Mandatory Reliability Standards for the Calculation of Available Transfer Capability, Capacity Benefit Margins, Transmission Reliability Margins, Total Transfer Capability, and Existing Transmission Commitments and Mandatory Reliability Standards for the Bulk-Power System*, Order No. 729, 129 FERC ¶ 61,155 (2009); Order on Clarification, Order No. 729-A, 131 FERC ¶ 61,109 (2010); Order on Rehearing and Reconsideration, Order No. 729-B, 132 FERC ¶ 61,027 (2010).

- Attachment C, Section 1.8 has been modified to further define “Postbacks” rather than referencing the definition contained within Deseret’s business practice.
- Attachment C, Section 1.10 has been modified to change the interval within the definition of “Scheduling Horizon” to mean the current hour plus the next eight (8) hours.
- Attachment C, Section 2.1 has been modified to add a title to the section and to add firm counterflows to the mathematical algorithm for firm Available Transmission Capability (“ATC”) calculations, as specified in NERC Reliability Standard MOD-029-1A, Requirement 7.
- Attachment C, Section 2.2 has been added to clearly specify the hourly, daily and monthly ATC calculation intervals, as specified in NERC Reliability Standard MOD-001-1A, Requirement 2.
- Attachment C, Section 2.3 has been added to clearly specify the minimum hourly, daily and monthly ATC recalculation intervals, as specified in NERC Reliability Standard MOD-001-1A, Requirement 8.
- Attachment C, Section 2.4 has been added to incorporate a process flow diagram.
- Attachment C, Section 3.5.1 and Section 3.6.1 have been modified to further define Deseret’s practice for firm and non-firm “Postbacks” and “Counterflows” rather than referencing information contained within Deseret’s OASIS.

By this amendment filing, Deseret proposes to withdraw in its entirety the proposed Attachment C submitted on March 15, 2011. This filing includes:

- This transmittal letter;
- A clean and marked copy (Attachments A and B, respectively) of an amended Attachment C; and
- All XML format schema and metadata required under Order No. 714.

A copy of this filing will be served on each of Deseret’s transmission customers.

Kimberly D. Bose
April 29, 2011
Page 3

Thank you for your prompt attention to this matter. Please do not hesitate to contact the undersigned if you have any questions concerning this request.

Sincerely,

A handwritten signature in black ink, appearing to read "CWSK".

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ATTACHMENT A

ATTACHMENT C

Methodology to Assess Available Transfer Capability

This Attachment C contains the Transmission Provider's methodology for determining Available Transfer Capability.

1. Definitions

- 1.1. **Available Transfer Capability (ATC)** - The measure of the transfer capability remaining in the physical transmission network for the further commercial activity over and above already committed uses. It is defined as the Total Transfer Capability less the Existing Transmission Commitments (including retail service), less a Capacity Benefit Margin, less a Transmission Reliability Margin, plus Postbacks, plus Counterflows.
- 1.2. **Capacity Benefit Margin (CBM)** - Capacity Benefit Margin (CBM) is that amount of firm transmission transfer capability preserved by the Transmission Provider for Load-Serving Entities (LSEs), whose loads are located on that Transmission Service Provider's system, to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies.
- 1.3. **Counterflows** - The scheduled energy values of transactions utilizing a Firm Transmission Service on the path in opposite direction for which an ATC is being

calculated, i.e., for the purposes of ATC calculations, Counterflows are firm tagged counter-schedules.

- 1.4. Existing Transmission Commitments (ETC)** - Committed uses of a Transmission Service Provider's Transmission System considered when determining ATC.
- 1.5. Firm Existing Transmission Commitments (ETC_F)** – The sum of firm transmission capacity set aside to satisfy all existing commitments for firm transmission service.
- 1.6. Non-Firm Existing Transmission Commitments (ETC_{NF})** – The sum of non-firm transmission capacity set aside to meet all existing commitments for non-firm transmission service.
- 1.7. Operating Horizon** - The period of time that begins at end of the Scheduling Horizon and extends through the end of the last day that has been or is being prescheduled.
- 1.8. Postbacks** - Positive adjustments to the ATC calculation. A Postback is the confirmed firm transmission reservation that has been redirected to another transmission path for the period of time that the redirection is effective. Postbacks for the non-firm ATC calculation also include any non scheduled portion of a firm transmission service reservation on the associated path.
- 1.9. Planning Horizon** - The period of time that begins at the end of the Operating Horizon and extends through the end of the posting period, as required by applicable regulations.
- 1.10. Scheduling Horizon** - The period of time that begins with the current hour plus the next eight hours.
- 1.11. Total Transfer Capability (TTC)** - The amount of electric power that can be transferred reliably from one area to another area on the interconnected transmission

systems by way of transmission lines (paths) between those areas under specified system conditions.

1.12. Transmission Reliability Margin (TRM) - That amount of transmission transfer capability necessary to provide a reasonable assurance that the interconnected transmission network will be secure. TRM accounts for the inherent uncertainty in system and the need for operating flexibility to ensure reliable system operation as system conditions change.

1.13. Transmission Service Request (TSR) – a request for transmission service submitted pursuant to Transmission Provider’s Open Access Transmission Tariff.

2. Description of Mathematical Algorithm Used to Calculate Firm And Non-Firm ATC

2.1. The ATC Calculation

The Transmission Provider uses the Rated System Path Methodology in the assessment of firm and non-firm ATC for all posted paths in the Planning, Operating and Scheduling Horizons. This ATC methodology is as prescribed in NERC Standard MOD-029-1, Rated System Path Methodology. The process of calculating ATC is performed in a third-party software product that utilizes variable parameter settings and calculation adjustments to establish formulas for the various firm and non-firm ATCs consistent with the mathematical algorithms used by the Transmission Provider.

The mathematical algorithms for firm and non-firm ATC in the Scheduling, Operating and Planning Horizons consist of the following general formulas:

$$ATC_F = TTC - ETC_F - CBM - TRM + Postbacks_F + Counterflows_F$$

$$ATC_{NF} = TTC - ETC_F - ETC_{NF} - CBM_S - TRM_U + Postbacks_{NF} + Counterflows_{NF}$$

The components of these general formulas are described in further detail in this Attachment C.

2.2. **Frequency of the ATC Calculation**

The ATC values are calculated for the following time periods:

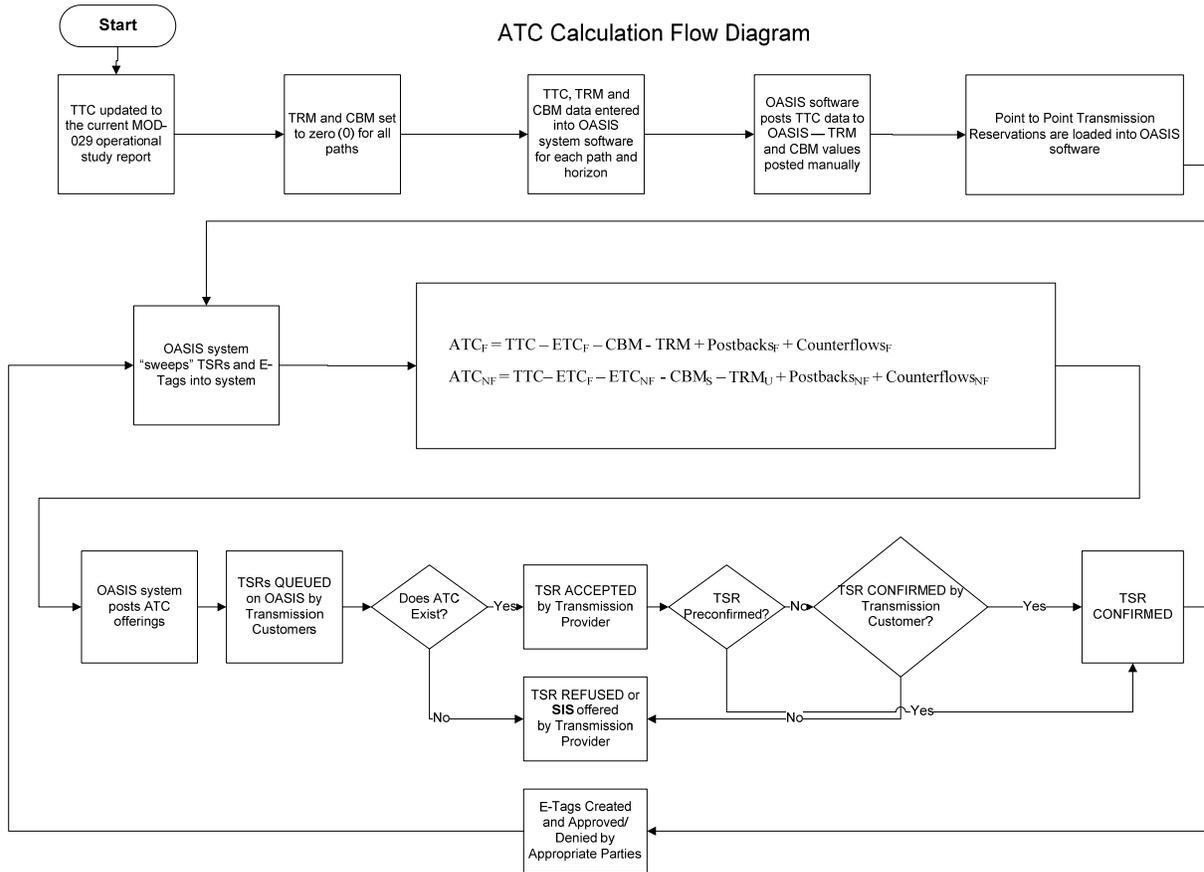
- (a) Hourly values for the next 48 hours.
- (b) Daily values for the next 31 calendar days.
- (c) Monthly values for the next 12 months (months 2-13).

2.3 **Frequency of the Recalculation of** the ATC Calculation

The updating or recalculation of the ATC values are calculated at a minimum for the following time periods:

- (a) Hourly values-once per hour.
- (b) Daily values-once per day
- (c) Monthly values-once per week.

2.4 **Process Flow Diagram Illustrating Various Steps through Which ATC is Calculated**



3. Detailed Description of How Each ATC Component is Calculated for the Operating and Planning Horizons

3.1 Total Transfer Capability (TTC)

3.1.1 Calculation Methodology

(a) When performing the technical studies to determine the TTC, the Transmission

Provider will follow the current version of the NERC Reliability Standard MOD-029

— Rated System Path Methodology, which states the process for determining TTC.

Power flow simulation software is used to model the transmission system.

- (b) Values for TTC on lines are the same for all Horizons. In the event of a forced or planned line outage the TTC is temporarily set to zero for the duration of the line outage.
- (c) Additional information regarding determination of TTC for specific paths may be posted and updated from time to time on Transmission Provider's OASIS.

3.1.2 Databases Used in TTC Assessments

The Transmission Provider uses the transmission model from the up-to-date system base cases that are developed annually by WECC for its member use in planning and operating studies. WECC base cases include—

- Equivalent representation of radial transmission lines.
- All contiguous transmission systems within the WECC Regional interconnection are modeled.
- Initial condition models of system elements are modeled as in or out of service as consistent for the time period being studied.
- All generation (either a single generator or multiple generators) greater than 20 MVA at the point of interconnection.
- By default phase shifters are modeled with automatic controls in non-regulating mode.
- Load as forecast by the Balancing Authorities for time period represented in the base cases.
- Transmission and Generation Facility additions and retirements are represented consistent with the time period represented.
- Special Protection Systems and/or Remedial Action Schemes are modeled as appropriate which currently exist or are projected to be implemented within the studied time horizon.
- Series compensation is modeled at the expected operating level.

- Facility Ratings are modeled as provided by the transmission and generator owners for the time period being studied.

3.2 Existing Transmission Commitments (ETC)

3.2.1 Determination Methodology

Existing Transmission Commitments (ETCs) are divided into two categories dependent upon whether the use is defined as being either for a firm or non-firm transmission use and its subsequent impact on the calculation of firm or non-firm ATC.

3.2.2 Firm Existing Transmission Commitments (ETC_F)

The following algorithm will be used when calculating ETC_F for all time horizons:

$$ETC_F = NL_F + NITS_F + GF_F + PTP_F + ROR_F + OS_F$$

Where:

- NL_F is the firm capacity set aside to serve peak Native Load commitments for the time period being calculated, to include losses and Native Load growth, not otherwise included in TRM or CBM. Currently all transmission use on the Transmission Provider's transmission system is Point-to-Point so NL_F is zero.
- NITS_F is the firm capacity reserved for the Network Integration Transmission Service serving Load, to include losses and load growth, not otherwise included in TRM or CBM. Since all current transmission service is PTP, NITS_F is zero.
- GF_F is the firm capacity set aside for the grandfathered firm transmission service and contracts for energy and/or Transmission Service, executed prior to the effective date of a Transmission Service Provider's Open Access Transmission

Tariff. The Transmission Provider has issued PTP_F AREF's for all GF service. Therefore GF_F is zero.

- PTP_F is the firm capacity reserved for confirmed Point-To-Point Transmission Service.
- ROR_F is the firm capacity reserved for Roll-over rights for contracts granting Transmission Customers the right of first refusal to take or continue to take transmission Service when the Transmission Customer's Transmission Service contract expires or is eligible for renewal.
- OS_F is the firm capacity reserved for any other service(s), contract(s) or agreements not specified above using Firm Transmission Service as specified in the Available Transfer Capability Implementation Document (ATCID).

3.2.3 **Non-Firm Existing Transmission Commitments (ETC_{NF})**

The following algorithm will be used when calculating ETC_{NF} for all time horizons:

$$ETC_{NF} = NITS_{NF} + GF_{NF} + PTP_{NF} + OS_{NF}$$

Where:

- $NITS_{NF}$ is the non-firm capacity reserved for Network Integration Transmission Service (i.e. secondary service), to include losses and local growth not otherwise included in TRM and CBM. For the Transmission Provider this is zero.
- GF_{NF} is the non-firm capacity set aside for grandfathered Transmission Service and contracts for energy and/or Transmission Service, executed prior to the effective date of a Transmission Service Provider's Open Access Transmission Tariff. The Transmission Provider does not use this.

- PTP_{NF} is the non-firm capacity reserved for non-firm Point-To-Point Transmission Service.

OS_{NF} – is the non-firm capacity reserved for any other service(s), contract(s), or agreement(s) not specified above using non-firm transmission service as specified in the ATCID.

3.3 **Transmission Reliability Margin (TRM)**

3.3.1 **Calculation Methodology**

The Transmission Provider does not use TRM so for purposes of calculating Firm and Non-Firm ATC; TRM is set to zero (0) for all posted paths.

3.3.2 **Databases Used in TRM Assessments**

Because the Transmission Provider does not set aside transfer capability for TRM in its ATC calculation methodology, no databases are currently used in assessing TRM.

3.4 **Capacity Benefit Margin (CBM)**

3.4.1 **Calculation Methodology**

It is the Transmission Provider's practice to not set aside transfer capability as CBM and as such CBM is set to zero (0) for all posted paths.

3.4.2 **Databases Used in CBM Assessments**

Because the Transmission Provider does not set aside transfer capability for CBM in its ATC calculation methodology, no databases are currently used in assessing CBM.

3.4.3 **No-Double Counting of Contingency Outages when Performing CBM, TTC, and TRM Calculations**

Because the Transmission Provider does not set aside transfer capability for CBM in its ATC calculation methodology and therefore sets CBM to zero (0) for all posted paths, there is no double counting of contingency outages when performing CBM calculations.

3.4.4 **Procedures for Use of CBM during Emergencies**

Because the Transmission Provider does not set aside transfer capability for CBM in its ATC calculation methodology, the Transmission Provider does not allow the use of CBM during emergencies.

3.5 **Postbacks**

3.5.1 **Practice**

Postbacks_F are set to zero (0) in the Firm ATC calculation. Postbacks_{NF} are included as an addition to the non-firm ATC calculation. For clarity, Postbacks_{NF} include any firm transmission service reservation on the associated path which has not been scheduled. In the Scheduling Horizon redirects are already included as part of non-scheduled firm transmission service.

3.6 **Counterflows**

3.6.1 **Practice**

Counterflows_F are set to zero (0) in the firm ATC calculation. Counterflows are included as an addition to the non-firm ATC calculation.

ATTACHMENT B

ATTACHMENT C

Methodology ~~Toto~~ Assess Available Transfer Capability

~~The Transmission Provider is not a control area operator. The Transmission Provider has delegated the responsibility for determining and posting Available Transmission Capacity (ATC) to PacifiCorp pursuant to the Control Area Services Agreement dated August 13, 2003, which was filed the Commission on August 14, 2003 in Docket No. ER03-1210-000. A brief description of the method by which PacifiCorp will determine and post Deseret's ATC is contained therein at Article 4. _____~~

This Attachment C contains the Transmission Provider's methodology for determining Available Transfer Capability.

1. Definitions

1.1. Available Transfer Capability (ATC) - The measure of the transfer capability remaining in the physical transmission network for the further commercial activity over and above already committed uses. It is defined as the Total Transfer Capability less the Existing Transmission Commitments (including retail service), less a Capacity Benefit Margin, less a Transmission Reliability Margin, plus Postbacks, plus Counterflows.

1.2. Capacity Benefit Margin (CBM) - Capacity Benefit Margin (CBM) is that amount of firm transmission transfer capability preserved by the Transmission Provider for Load-Serving Entities (LSEs), whose loads are located on that Transmission Service Provider's system, to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability

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2. Description of Mathematical Algorithm Used to Calculate Firm And Non-Firm ATC

2.1. The ATC Calculation

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The mathematical algorithms for firm and non-firm ATC in the Scheduling, Operating and Planning Horizons consist of the following general formulas:

$$ATC_F = TTC - ETC_F - CBM - TRM + Postbacks_F + Counterflows_F$$

$$ATC_{NF} = TTC - ETC_F - ETC_{NF} - CBM_S - TRM_U + Postbacks_{NF} + Counterflows_{NF}$$

The components of these general formulas are described in further detail in this Attachment C.

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The ATC values are calculated for the following time periods:

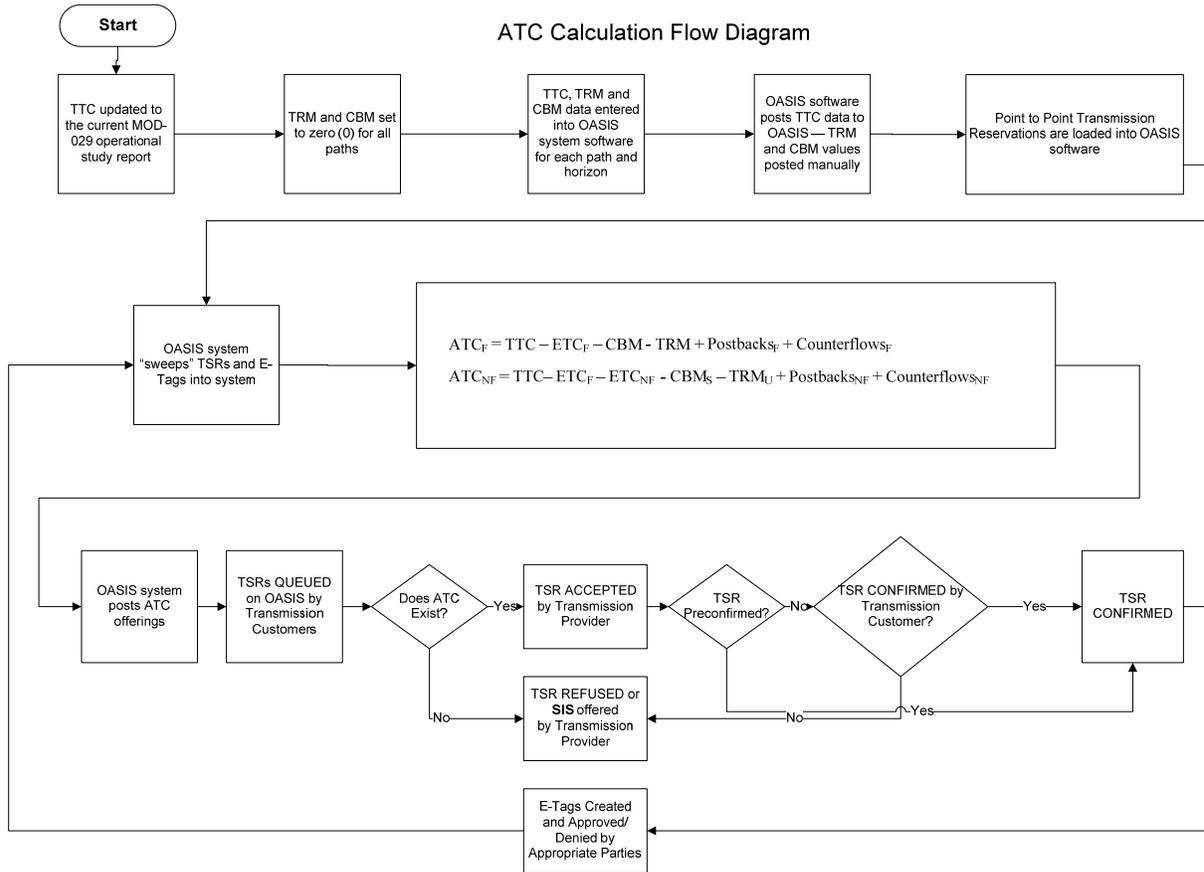
- (a) Hourly values for the next 48 hours.
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The updating or recalculation of the ATC values are calculated at a minimum for the following time periods:

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- (c) Monthly values-once per week.

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3. Detailed Description of How Each ATC Component is Calculated for the Operating and Planning Horizons

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3.1.1 Calculation Methodology

(a) When performing the technical studies to determine the TTC, the Transmission

Provider will follow the current version of the NERC Reliability Standard MOD-029

— Rated System Path Methodology, which states the process for determining TTC.

Power flow simulation software is used to model the transmission system.

(b) Values for TTC on lines are the same for all Horizons. In the event of a forced or planned line outage the TTC is temporarily set to zero for the duration of the line outage.

(c) Additional information regarding determination of TTC for specific paths may be posted and updated from time to time on Transmission Provider's OASIS.

3.1.2 Databases Used in TTC Assessments

The Transmission Provider uses the transmission model from the up-to-date system base cases that are developed annually by WECC for its member use in planning and operating studies. WECC base cases include—

- Equivalent representation of radial transmission lines.
- All contiguous transmission systems within the WECC Regional interconnection are modeled.
- Initial condition models of system elements are modeled as in or out of service as consistent for the time period being studied.
- All generation (either a single generator or multiple generators) greater than 20 MVA at the point of interconnection.
- By default phase shifters are modeled with automatic controls in non-regulating mode.
- Load as forecast by the Balancing Authorities for time period represented in the base cases.
- Transmission and Generation Facility additions and retirements are represented consistent with the time period represented.
- Special Protection Systems and/or Remedial Action Schemes are modeled as appropriate which currently exist or are projected to be implemented within the studied time horizon.
- Series compensation is modeled at the expected operating level.

- Facility Ratings are modeled as provided by the transmission and generator owners for the time period being studied.

3.2 Existing Transmission Commitments (ETC)

3.2.1 Determination Methodology

Existing Transmission Commitments (ETCs) are divided into two categories dependent upon whether the use is defined as being either for a firm or non-firm transmission use and its subsequent impact on the calculation of firm or non-firm ATC.

3.2.2 Firm Existing Transmission Commitments (ETC_F)

The following algorithm will be used when calculating ETC_F for all time horizons:

$$\frac{ETC}{F} = \frac{NL}{F} + \frac{NITS}{F} + \frac{GF}{F} + \frac{PTP}{F} + \frac{ROR}{F} + \frac{OS}{F}$$

Where:

- NL_F is the firm capacity set aside to serve peak Native Load commitments for the time period being calculated, to include losses and Native Load growth, not otherwise included in TRM or CBM. Currently all transmission use on the Transmission Provider's transmission system is Point-to-Point so NL_F is zero.
- NITS_F is the firm capacity reserved for the Network Integration Transmission Service serving Load, to include losses and load growth, not otherwise included in TRM or CBM. Since all current transmission service is PTP, NITS_F is zero.
- GF_F is the firm capacity set aside for the grandfathered firm transmission service and contracts for energy and/or Transmission Service, executed prior to the effective date of a Transmission Service Provider's Open Access Transmission

Tariff. The Transmission Provider has issued PTP_F AREF's for all GF service. Therefore GF_F is zero.

- PTP_F is the firm capacity reserved for confirmed Point-To-Point Transmission Service.
- ROR_F is the firm capacity reserved for Roll-over rights for contracts granting Transmission Customers the right of first refusal to take or continue to take transmission Service when the Transmission Customer's Transmission Service contract expires or is eligible for renewal.
- OS_F is the firm capacity reserved for any other service(s), contract(s) or agreements not specified above using Firm Transmission Service as specified in the Available Transfer Capability Implementation Document (ATCID).

3.2.3 Non-Firm Existing Transmission Commitments (ETC_{NF})

The following algorithm will be used when calculating ETC_{NF} for all time horizons:

$$\text{ETC}_{NF} = \text{NITS}_{NF} + \text{GF}_{NF} + \text{PTP}_{NF} + \text{OS}_{NF}$$

Where:

- NITS_{NF} is the non-firm capacity reserved for Network Integration Transmission Service (i.e. secondary service), to include losses and local growth not otherwise included in TRM and CBM. For the Transmission Provider this is zero.
- GF_{NF} is the non-firm capacity set aside for grandfathered Transmission Service and contracts for energy and/or Transmission Service, executed prior to the effective date of a Transmission Service Provider's Open Access Transmission Tariff. The Transmission Provider does not use this.

- PTP_{NF} is the non-firm capacity reserved for non-firm Point-To-Point Transmission Service.

OS_{NF} – is the non-firm capacity reserved for any other service(s), contract(s), or agreement(s) not specified above using non-firm transmission service as specified in the ATCID.

3.3 Transmission Reliability Margin (TRM)

3.3.1 Calculation Methodology

The Transmission Provider does not use TRM so for purposes of calculating Firm and Non-Firm ATC; TRM is set to zero (0) for all posted paths.

3.3.2 Databases Used in TRM Assessments

Because the Transmission Provider does not set aside transfer capability for TRM in its ATC calculation methodology, no databases are currently used in assessing TRM.

3.4 Capacity Benefit Margin (CBM)

3.4.1 Calculation Methodology

It is the Transmission Provider's practice to not set aside transfer capability as CBM and as such CBM is set to zero (0) for all posted paths.

3.4.2 Databases Used in CBM Assessments

Because the Transmission Provider does not set aside transfer capability for CBM in its ATC calculation methodology, no databases are currently used in assessing CBM.

3.4.3 No-Double Counting of Contingency Outages when Performing CBM, TTC, and TRM Calculations

Because the Transmission Provider does not set aside transfer capability for CBM in its ATC calculation methodology and therefore sets CBM to zero (0) for all posted paths, there is no double counting of contingency outages when performing CBM calculations.

3.4.4 Procedures for Use of CBM during Emergencies

Because the Transmission Provider does not set aside transfer capability for CBM in its ATC calculation methodology, the Transmission Provider does not allow the use of CBM during emergencies.

3.5 Postbacks

3.5.1 Practice

Postbacks_F are set to zero (0) in the Firm ATC calculation. Postbacks_{NF} are included as an addition to the non-firm ATC calculation. For clarity, Postbacks_{NF} include any firm transmission service reservation on the associated path which has not been scheduled. In the Scheduling Horizon redirects are already included as part of non-scheduled firm transmission service.

3.6 Counterflows

3.6.1 Practice

Counterflows_F are set to zero (0) in the firm ATC calculation. Counterflows are included as an addition to the non-firm ATC calculation.