publicly available."²⁰ This information must be available for download on the RIN.

Question 16. The Commission requests comments on how the data used in calculating ATC should be formatted. Should it be in free form text, predefined tables, or comma delimited ASCII files? If in free form text, should it be in plain ASCII text or in a word processor format, such as WordPerfect or Word?

Question 17. The Commission requests comments on what is the appropriate time delay for making supporting information on ATC available. Should the Commission require specific formats for ATC supporting data? If so, what should the formats be?

Near-Term Transmission Information

The What Report provides arguments for and against providing additional information beyond ATC on the RIN. Those entities who are against providing additional information argue that this information is of little practical use, sufficiently voluminous to substantially reduce performance of the RIN, and burdensome to provide. They further argue that some of this information is competitive data. Those entities who are in favor of providing additional information beyond ATC on the RIN argue that the additional information will increase the confidence of transmission customers in the validity of the posted ATC and that this information will help the transmission customers anticipate with greater certainty whether to attempt to request and schedule resources that may be subject to curtailment due to projected loading trends on certain system components.

The Commission believes that the issue of customer confidence can be addressed through audits of posted ATC values or by raising the issue at regional forums or filing a complaint with the Commission. However, the Commission also believes that transmission customers should have as much pertinent information available as will enable them to make informed decisions about the relative quality of wholesale transmission services they intend to request and purchase.

The Commission therefore proposes to require that Transmission Providers post information about those system elements that have a direct and significant impact on ATC. Such elements could include generators, transmission lines, phase shifters, series and shunt capacitors, static VAR compensators, special protection systems or remedial action schemes, etc. In addition, the Commission proposes to require the posting of actual path loadings in addition to the path schedules.

Question 18. To keep the amount of information on the RIN manageable, the Commission requests comment on whether it is sufficient to provide information only about planned outages and return dates (for both planned and forced outages) for those system elements deemed to have a direct and significant impact on ATC and whether posting this information on the RIN would cause any confidentiality concerns.

Question 19. Since many system elements can impact the ATC of a path, how should "significant and direct impact" be defined? Is it acceptable to limit the additional information to those system elements for which nomograms, derating tables, and operating guides have been developed?

Question 20. Are there any difficulties, technical or otherwise, associated with posting actual path flows on the RIN?

The ATC of some transmission paths is a function of run status and/or megawatt output of certain generators. For example, the Southern California Import Transmission Nomogram is affected by the run status of units in the Palo Verde Generation Complex. When one or more of the Palo Verde units are not on line, the nomogram is reduced by several hundred megawatts.²¹

Question 21. In cases where ATC of a path is a function of run status of one or more generators, is it sufficient to post the expected amount and date of changes to ATC on the RIN, corresponding to the planned outage or return dates of generators?

Question 22. If operating guides, nomograms, operating studies, and similar information are to be made available on the RIN for download, would it be logical to expect that transmission customers will be able to deduce the run status of those generators which significantly and directly impact ATC by observing the changes to ATC?

Far-Term Transmission Information

The What Report proposes that for "far-term" transmission service (over one year), firm service (non-recallable) ATC should be posted "seasonal[ly], by year, for years 1–10 (as available)." ²² The caveat "as available" suggests that the What Group does not want utilities to have to perform additional transmission studies to calculate "farterm" ATCs beyond those done for normal planning and special requests.

The Commission agrees with this. However, we find the "as available" requirement vague. It appears to leave the posting of this information to the discretion of the Transmission Provider. For clarity, the Commission proposes to require that any planning or specifically requested studies of the transmission network performed by the Transmission Provider be provided on the RIN on a same-time basis. This would include only those parts of customer-specific interconnection studies that relate to network impacts.

Question 23. The Commission requests comments on how transmission studies should be formatted for download from the RIN. Should they be in free form ASCII text, or in a word processor format, such as WordPerfect or Word?

p. Requested Start and End Times/Dates

In the section in the What Report on "Information Provided by Transmission Customer in Requesting Service", under "duration" the report states that "[t]his must correspond to full clock hour periods."²³ The Commission proposes to enhance flexibility by requiring instead that the duration must be a specific time as stated in the Transmission Provider's tariff.

q. Transaction Anonymity

The What Report raises a question about whether individual transmission requests and responses should be made known only to the Transmission Customer making the request, the Transmission Provider to whom the request is made and, to the extent necessary, the affected control area operators and/or security centers, or to all users of the RIN on a same-time basis. The Commission proposes to restrict information about the request and response process, while it is ongoing, to those parties directly involved.

We believe that this procedure will be adequate because we are proposing standards of conduct that would require Transmission Providers to separate the functions of their marketing employees and their system operations employees and that would restrict access by wholesale marketing employees to information available on the RIN. Information about a completed request and response process should be recorded in the audit file.

r. Auditing Transmission Service Information

The Commission proposes that RIN audit log files ²⁴ must be downloadable from the RIN in a standard format and must be retained on a rolling basis for three years from entry on the RIN.

The Commission notes that transmission transaction prices are to be

²⁰What Report at 121.

²¹ A nomogram defines the interactive relationship of the transfer capability of a transmission path to other system conditions, especially power flows on one or more other transmission paths.

²²What Report at 24.

²³ What Report at 26.

²⁴ See What Report at 31.