

## Moleski, Thomas M.

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**From:** paul.kure@rfirst.org  
**Sent:** Thursday, January 14, 2016 11:14 AM  
**To:** Moleski, Thomas M.; rwestphal@misoenergy.org; cblanfor  
**Subject:** FW: Replacement of MOD-016, MOD-017, MOD-018, MOD-019, and MOD-021 with MOD-031

External Email – Think before clicking links or attachments.  
Gentlemen:

With the implementation of NERC standard MOD-031 and the retirement of MOD-016, MOD-017, MOD-018, MOD-019, and MOD-021, effective on July 1, ReliabilityFirst does not believe there is any need to confirm the submittal of the data required in the soon to be retired MOD-017 and MOD-019 standards. Accordingly, there will be no MOD-017 and MOD-019 data submittal identified in the monthly compliance monitoring schedule issued monthly by ReliabilityFirst compliance staff.

If any of your members have questions about the data confirmation that we have done in previous years, you may use this email to document that this confirmation of data submission will no longer be required. For further information, see the email below.

Submission of the data identified in these MOD standards will continue to be requested by NERC and ReliabilityFirst. The NERC Rules of Procedure and ReliabilityFirst Bylaws provide the authority to collect this data for our reliability assessments. However, there is no longer a compliance obligation to document or confirm the data submittal.

Regards,

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-----Original Message-----

From: Paul Kure  
Sent: Tuesday, January 05, 2016 11:41 AM  
To: Bob Folt <[bob.folt@rfirst.org](mailto:bob.folt@rfirst.org)>  
Subject: Replacement of MOD-016, MOD-017, MOD-018, MOD-019, and MOD-021 with MOD-031

Hi Bob:

In reference to NERC standards MOD-017 and MOD-019, (to be replaced by MOD-031), there is no specific due date associated with the data submittals required in MOD 017 and MOD-019. We (RAPA) believe we can defer MOD-017 and MOD-019 data submittal compliance to the replacement standard, MOD-031, which is effective 7/1/16.

Data submittals under MOD-031 are made to the PCs or BAs, if and when the PC or BA uses the MOD-031 authority for the purpose of collecting data specifically allowed under MOD-031. There is no request to provide this compliance documentation to the Regional Entity outside of a compliance audit of MOD-031 and only if a request for this data is specifically made by a PC or BA using the MOD-031 authority granted in the standard.

Since it is expected that PJM and MISO will collect this data from their members in the normal course of conducting RTO business, RAPA does not anticipate a need for either RTO to use MOD-031 as the authority to collect data. With the implementation of MOD-031 and retirement of MOD-016, MOD-017, MOD-018, MOD-019, and MOD-021, there is no longer any need to document for standard compliance that the data has been submitted by PJM or MISO to ReliabilityFirst on behalf of their members. Furthermore, the standard requirements for LSEs under MOD-017 and MOD-019 became moot when the LSEs were removed from the NERC registry. Therefore, there is no longer a compliance requirement associated with this data collection.

Regards,

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