

**NORTH AMERICAN ENERGY STANDARDS BOARD**  
**Wholesale Electric Quadrant Report**  
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(effective 01/18/05)

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## **Appendix I: Requests for Standards**

The standards reported in this filing were based on the following standards requests:

Request No. R04005\*  
Request No. R04006  
Request No. R04011  
Request No. R04013

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\* The attachments to Request R04005 have not been included in this appendix due to their size, but are available for download from the NAESB web site. Please contact the NAESB office (713-356-0060 or [naesb@naesb.org](mailto:naesb@naesb.org)) for assistance in locating the documents.

# R04005

## **Request for Initiation of a NAESB Standard for Electronic Business Transactions or Request for Enhancement of a NAESB Standard for Electronic Business Transactions**

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### **North American Energy Standards Board**

#### **Request for Initiation of a NAESB Business Practice Standard, Model Business Practice or Electronic Transaction or Enhancement of an Existing NAESB Business Practice Standard, Model Business Practice or Electronic Transaction**

#### Instructions:

1. Please fill out as much of the requested information as possible. It is mandatory to provide a contact name, phone number and fax number to which questions can be directed. If you have an electronic mailing address, please make that available as well.
2. Attach any information you believe is related to the request. The more complete your request is, the less time is required to review it.
3. Once completed, send your request to:  
Rae McQuade  
NAESB, Executive Director  
1301 Fannin, Suite 2350  
Houston, TX 77002  
  
Phone: 713-356-0060  
Fax: 713-356-0067

by either mail, fax, or to NAESB's email address, [naesb@aol.com](mailto:naesb@aol.com).

Once received, the request will be routed to the appropriate subcommittees for review.

Please note that submitters should provide the requests to the NAESB office in sufficient time so that the NAESB Triage Subcommittee may fully consider the request prior to taking action on it. It is preferable that the request be submitted a minimum of 3 business days prior to the Triage Subcommittee meetings. Those meeting schedules are posted on the NAESB web site at [http://www.naesb.org/monthly\\_calendar.asp](http://www.naesb.org/monthly_calendar.asp).

# R04005

## **Request for Initiation of a NAESB Standard for Electronic Business Transactions or Request for Enhancement of a NAESB Standard for Electronic Business Transactions**

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### **North American Energy Standards Board**

#### **Request for Initiation of a NAESB Business Practice Standard, Model Business Practice or Electronic Transaction**

**or**

#### **Enhancement of an Existing NAESB Business Practice Standard, Model Business Practice or Electronic Transaction**

Date of Request: December 29, 2003

1. Submitting Entity & Address:  
Southern Company Services  
600 North 18th Street  
Birmingham, AL 35291
  
2. Contact Person, Phone #, Fax #, Electronic Mailing Address:  
Name : Mr. Joel Dison  
Title : Manager of Market Policy  
Phone : (205) 257-6481  
Fax : (205) 257-6824  
E-mail: [jjdison@southernco.com](mailto:jjdison@southernco.com)
  
3. Description of Proposed Standard or Enhancement:  
We propose the WEQ's acceptance of the current OASIS Business Practice Standards and Communication Protocol Standards.
  
4. Use of Proposed Standard or Enhancement (include how the standard will be used, documentation on the description of the proposed standard, any existing documentation of the proposed standard, and required communication protocols):

The business practice standards are designed to implement the Commission's policy related to on-line price negotiation and to improve the commercial operation of the Open Access Same-Time Information System (OASIS). Complete documentation of the business practice standards and the related communication protocols is attached to this request:

- Federal Energy Regulatory Commission Business Practice Standards

# R04005

## **Request for Initiation of a NAESB Standard for Electronic Business Transactions or Request for Enhancement of a NAESB Standard for Electronic Business Transactions**

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for Open Access Same-Time Information System (OASIS) Transactions, Version 1.2, issued October 25, 2000 (Attachment A).

- Standards and Communication Protocols for Open Access Same-Time Information System (OASIS), Version 1.4, July 26, 2000 (Attachment B).
- Data Dictionary, Standards and Communication Protocols for Open Access Same-Time Information System (OASIS), Version 1.4, July 26, 2000 (Attachment C)
- Revisions to Section 4.2.10.2 of the S&CP Document, 4.2.10.2, Status Values (Attachment D).
- Oasis Version 1.4 corrections, outlined in a letter dated January 30, 2001, from Paul R. Sorenson, OSC Chair, to David P. Borgers, Office of the Secretary, Federal Energy Regulatory Commission (Attachment E).
- FERC Order 605 (Attachment F).
- FERC Order 889 (Attachment G).
- FERC Order 889 Appendix A Data Element Dictionary (Attachment H).
- FERC Order 889 Appendix B Request (Query) Variables (Attachment I).

5. Description of Any Tangible or Intangible Benefits to the Use of the Proposed Standard or Enhancement:

The industry and the Commission have already ascertained and realized the benefits of these standards as they are already required by FERC regulation.

6. Estimate of Incremental Specific Costs to Implement Proposed Standard or Enhancement:

No additional costs for implementation are expected – this request to adopt standards is reflective of a final order that requires companies to implement such. As the order is final, the parties have already implemented these standards.

7. Description of Any Specific Legal or Other Considerations:

This is an existing standard already adopted by the FERC.

# R04005

## **Request for Initiation of a NAESB Standard for Electronic Business Transactions or Request for Enhancement of a NAESB Standard for Electronic Business Transactions**

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8. If This Proposed Standard or Enhancement Is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement (Corporations and contacts):

N/A

9. If This Proposed Standard or Enhancement Is In Use, Who are the Trading Partners :

The standard applies to transmission users' interactions with public utilities.

10. Attachments (such as : further detailed proposals, transaction data descriptions, information flows, implementation guides, business process descriptions, examples of ASC ANSI X12 mapped transactions):

The Standards are composed from the following attached documents:

- Federal Energy Regulatory Commission Business Practice Standards for Open Access Same-Time Information System (OASIS) Transactions, Version 1.2, issued October 25, 2000 (Attachment A).
- Standards and Communication Protocols for Open Access Same-Time Information System (OASIS), Version 1.4, July 26, 2000 (Attachment B).
- Data Dictionary, Standards and Communication Protocols for Open Access Same-Time Information System (OASIS), Version 1.4, July 26, 2000 (Attachment C)
- Revisions to Section 4.2.10.2 of the S&CP Document, 4.2.10.2, Status Values (Attachment D).
- Oasis Version 1.4 corrections, outlined in a letter dated January 30, 2001, from Paul R. Sorenson, OSC Chair, to David P. Borgers, Office of the Secretary, Federal Energy Regulatory Commission (Attachment E).
- FERC Order 605 (Attachment F).
- FERC Order 889 (Attachment G).
- FERC Order 889 Appendix A Data Element Dictionary (Attachment H).
- FERC Order 889 Appendix B Request (Query) Variables (Attachment I).

# **R04006**

## **Request for Initiation of a NAESB Standard for Electronic Business Transactions or Request for Enhancement of a NAESB Standard for Electronic Business Transactions**

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### **North American Energy Standards Board**

#### **Request for Initiation of a NAESB Business Practice Standard, Model Business Practice or Electronic Transaction or Enhancement of an Existing NAESB Business Practice Standard, Model Business Practice or Electronic Transaction**

#### Instructions:

1. Please fill out as much of the requested information as possible. It is mandatory to provide a contact name, phone number and fax number to which questions can be directed. If you have an electronic mailing address, please make that available as well.
2. Attach any information you believe is related to the request. The more complete your request is, the less time is required to review it.
3. Once completed, send your request to:  
Rae McQuade  
NAESB, Executive Director  
1301 Fannin, Suite 2350  
Houston, TX 77002  
  
Phone: 713-356-0060  
Fax: 713-356-0067

by either mail, fax, or to NAESB's email address, [naesb@aol.com](mailto:naesb@aol.com).

Once received, the request will be routed to the appropriate subcommittees for review.

Please note that submitters should provide the requests to the NAESB office in sufficient time so that the NAESB Triage Subcommittee may fully consider the request prior to taking action on it. It is preferable that the request be submitted a minimum of 3 business days prior to the Triage Subcommittee meetings. Those meeting schedules are posted on the NAESB web site at [http://www.naesb.org/monthly\\_calendar.asp](http://www.naesb.org/monthly_calendar.asp).



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## Request for Initiation of a NAESB Standard for Electronic Business Transactions or Request for Enhancement of a NAESB Standard for Electronic Business Transactions

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### North American Energy Standards Board

#### Request for Initiation of a NAESB Business Practice Standard, Model Business Practice or Electronic Transaction or Enhancement of an Existing NAESB Business Practice Standard, Model Business Practice or Electronic Transaction

Date of Request: December 29, 2003

1. Submitting Entity & Address:  
Southern Company Services  
600 North 18th Street  
Birmingham, AL 35291
  
2. Contact Person, Phone #, Fax #, Electronic Mailing Address:  
Name : Mr. Monroe Landrum  
Title : Manager, Operating Systems  
Phone : (205) 257-6936  
Fax : (205) 257-6663  
E-mail: mjlandru@southernco.com
  
3. Description of Proposed Standard or Enhancement:  
We propose the WEQ's acceptance of the IT subcommittee's recommended actions on the OASIS 1A issues that were left over from the OASIS Scheduling Collaborative.
  
4. Use of Proposed Standard or Enhancement (include how the standard will be used, documentation on the description of the proposed standard, any existing documentation of the proposed standard, and required communication protocols):

The specification/business practice issues represent enhancements or development of new standards that would need to be created to support the recommendations of the IT Subcommittee that would need to be created. Our comments reflect which items that we feel that the NAESB WEQ EC should take action on and which items that we feel do not

# R04006

## **Request for Initiation of a NAESB Standard for Electronic Business Transactions or Request for Enhancement of a NAESB Standard for Electronic Business Transactions**

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warrant further consideration from a cost/benefit perspective. Note that some of the items that we recommended not to move forward on, only apply to OASIS 1A but should be considered in the development of OASIS II. Those are noted in the attachment.

5. Description of Any Tangible or Intangible Benefits to the Use of the Proposed Standard or Enhancement:

The compliance/clarification issues involve concerns about standards not being followed or various implementations of the standard due to varying interpretations of the standards. It is our position that since NAESB is not a compliance monitoring organization and since the FERC has a hotline for presenting such issues, that NAESB take no further actions other than to post our responses on the ITS website.

6. Estimate of Incremental Specific Costs to Implement Proposed Standard or Enhancement:

N/A

7. Description of Any Specific Legal or Other Considerations:

This is an existing standard already adopted by the FERC.

8. If This Proposed Standard or Enhancement Is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement (Corporations and contacts):

N/A

9. If This Proposed Standard or Enhancement Is In Use, Who are the Trading Partners :

N/A

10. Attachments (such as : further detailed proposals, transaction data descriptions, information flows, implementation guides, business process descriptions, examples of ASC ANSI X12 mapped transactions):

- **Letter from Monroe Landrum to Rae McQuade**

To: Rae McQuade, chair NAESB WEQ EC  
From: Monroe Landrum, chair NAESB WEQ ITS

Subject: OASIS 1A Issues

On the behalf of the ITS, I am forwarding our recommended actions on the OASIS 1A issues that were left over from the OASIS Scheduling Collaborative. Looking at the attachment, you will notice that we have categorized the issues into general issues, compliance/clarification issues, and specification/business practices issues. We have provided comments on each of the issues and recommend that the document be posted on the ITS website with a notice to those subscribed to the ITS.

The general issues are primarily opinions on how we should proceed with OASIS 1A. The compliance/clarification issues involve concerns about standards not being followed or various implementations of the standard due to varying interpretations of the standards. It is our position that since NAESB is not a compliance monitoring organization and since the FERC has a hotline for presenting such issues, that NAESB take no further actions other than to post our responses on the ITS website.

The specification/business practice issues represent enhancements or new standards that would need to be created. Our comments reflect which items that we feel that the NAESB WEQ EC should take action on and which items that we feel do not warrant further consideration from a cost/benefit perspective. Note that some of the items that we recommended not to move forward on, only apply to OASIS 1A but should be considered in the development of OASIS II. Those are noted in the attachment. Our recommended action items are listed:

- **Redirect of Transmission Service**

Using OASIS to process and record redirects of transmission service is a difficult task. There are many issues related to the redirect and resale functionality, but most are caused by provider business rules or vendor design choices.

The primary issue concerns redirects of transmission service. The current OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold (reassigned) transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as REDIRECTS, that use this resold or reassigned transmission service. This is only an issue when the 2<sup>nd</sup> customer wants to redirect transmission usage to a constrained path. Currently, unless the provider intervenes on the backend, that provider only has the option to deny this type of transaction when it is tagged. (Specification/Business Practice)

**This issue, since it is not addressed in the S&CP, is ripe for standardization. It is suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort in specification in OASIS 1A.**

- **Recalls of Transmission Service**

Recall allows a provider to reduce the capacity or duration of a transmission request. The issue with recalls concerns implementation and may be an issue to address at the provider/vendor level. However, clarification is needed.

When a provider recalls a transmission request that is a REDIRECT, should capacity be returned to the impacted request? When a provider recalls any impacting request type, should capacity be returned to the impacted request? If so, should a provider post reductions for the entire “chain” of requests? (Business Practices)

**This issue also is not addressed in the S&CP and needs standardization through business practices process. It was suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort.**

- **Multiple Submissions of Identical Transmission Requests / Queuing Issues**

OASIS business rules are very similar across most providers. In general, customers submitting transmission request have time periods when they can “queue” their requests. This queue process and the way it relates to the Internet can create issues when customers are “battling” for ATC on constrained interfaces.

Many customers have automated the submission of transmission requests. In order to ensure their place in the queue, these customers schedule these requests to be submitted as a scheduled event. To account for delays caused by the Internet and the nature of web server systems, customers usually submit multiple copies of the same request beginning a few minutes before the top of the hour and lasting until well after the top of the hour.

The issues created by duplicate request submittal are fairly straightforward. Backend systems and the operators working those systems are impacted dramatically. Each request that arrives after the top of the hour is a valid request. Therefore, the provider can have hundreds of requests in the queue that will never be confirmed.

Other issues that are created are related to OASIS performance. Anyone using transstatus to retrieve a list of OASIS requests submitted during a time period similar to the one described above can receive hundreds of bogus requests and only a hand full of legitimate requests. Also, while the systems are busy working on the bogus requests, valid requests can be delayed due to bottlenecks created by this issue. Does there need to be a standard to limit these issues? Will FERC Order 605 address this issue? (Specification/Business Practice)

**This issue should be worked on as both a technical and business practice modification. This was discussed at length and the discussion revealed this is a very complex issue that needs to be resolved. (Note that the MIPS attempted to address this issue a couple of years ago, but their recommendations were turned down by FERC).**

- **Standardized Process for NITS service on OASIS Part(b)**

Examples:

Standardized process for NITS service on OASIS:

- a) Initial service application procedure
  - b) Designation of network resources
  - c) Addition of network resources
  - d) Elimination of network resources
- (Business Practice)

**The enumerated standardization process was identified as a business process issue that should be referred to the ESS.**

**• Naming Standardization**

Standardization for items such as service points is a continuing problem in OASIS and should be addressed. (Specification/Business Practices)

**This confusion over multiple names for the same physical point(s) has been a long standing issue. The major issue was identified as follows: at a point of interconnect between two providers, how is the point name established and agreed-upon such that the name is used consistently for both parties. It was agreed that this would be both a technical and business process change for the IT and ESS to address.**

It is our suggestion that the EC review these recommendations and assign them to the ITS and/or the ESS for the development of a request for standards for these issues. Our group acknowledges that this is not the normal approach for developing standards requests, however due to the uniqueness of the situation; we wanted the EC to confirm that these issues would be the types of activities that we should be pursuing. While the business practices and S&CP have not yet been adopted by NAESB, we understand that this is currently being addressed. By moving ahead with the development of the standards requests, we would have these in place by the time that the adoption of the BPs and S&CP were complete.

**Executive Summary**

The following recommendations to address the OASIS issues listed below have been submitted by the WEQ OASIS 1A Issues Task Force for general approval by the WEQ IT Subcommittee. All issues have been documented and sub-divided into three categories (specification/business practices issues, general issues, and compliance/clarification issues). The goal of this task force is to recommend to the IT subcommittee an appropriate categorization of and resolution process for the twenty (20) OASIS Phase 1A issues listed in this document. A quick overview of the task force recommendations are presented first, followed by more detailed discussion under each specific issue. The numbering system was maintained from the original listing to promote continuity in both sections and the original.

**OASIS 1A Issues (Quick Overview)**

- 1. Additional Standardization in OASIS Phase 1A** (General)
- 2. GUI Issue/Navigation** (General)
- 3. Output Formats** (Specification)
- 4. INFO.HTM** (Compliance)
- 5. Posting of Schedules** (Compliance)

- 6. TLR & Curtailment Posting** (Compliance/Clarification)
  - 7. Posting of Advertisements** (Clarification)
  - 8. Upgrade Planning & Progression** (General)
  - 9. Responsibility Determination** (General)
  - 10. Redirect of Transmission Service** (Specification/Business Practice)
  - 11. Recalls of Transmission Service** (Business Practices)
  - 12. Multiple Submissions of Identical Transmission Requests / Queuing Issues** (Specification/Business Practice)
  - 13. Population of System Data** (Compliance)
  - 14. Ancillary Service Requests and Purchases** (Compliance)
  - 15. ATC Updates** (Business Practice)
  - 16. NAESB Implementation of a Compliance Program** (General)
  - 17. Announcing / Posting of OASIS Outages** (Specification)
  - 18. This issue originally was one item; now broken into three separate items.**
    - 18(a). Standardized Process for NITS service on OASIS (Use of Status Indicators)**  
Part(a) (Compliance)
    - 18(b). Standardized Process for NITS service on OASIS**  
Part(b) (Specification/Business Practice)
    - 18(c). Standardized Process for NITS service on OASIS (Difference in TP Posting and Capacity)**  
Part(c) (Compliance/Clarification)
  - 19. Posting Reference Field** (Compliance/Clarification/Specification)
  - 20. This issue originally was six items; now condensed down to one item.**
  - 20. Other Items (Naming Standardization)** (Specification/Business Practices)
- OASIS 1A Issues  
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## **OASIS 1A Issues**

### **Specification/Business Practices Issues**

#### **3. Output Formats**

Should additional output formats, such as XML, be added to the S&CP? (Specification)

*At this time there is not a need for making a massive change in the way output formats are generated. The S&CP standards for OASIS Phase 1A are the accepted way to communicate output formats at this time and does not need changing. Perhaps in OASIS Phase II the potential benefits of XML can be considered. It was suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort.*

#### **10. Redirect of Transmission Service**

Using OASIS to process and record redirects of transmission service is a difficult task. There are many issues related to the redirect and resale functionality, but most are caused

by provider business rules or vendor design choices.

The primary issue concerns redirects of transmission service. The current OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold (reassigned) transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as REDIRECTS, that use this resold or reassigned transmission service. This is only an issue when the 2<sup>nd</sup> customer wants to redirect transmission usage to a constrained path. Currently, unless the provider intervenes on the backend, that provider only has the option to deny this type of transaction when it is tagged. (Specification/Business Practice)

**This issue, since it is not addressed in the S&CP, is ripe for standardization. It was suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort in specification in OASIS 1A.**

## **11. Recalls of Transmission Service**

Recall allows a provider to reduce the capacity or duration of a transmission request. The issue with recalls concerns implementation and may be an issue to address at the provider/vendor level. However, clarification is needed.

When a provider recalls a transmission request that is a REDIRECT, should capacity be returned to the impacted request? When a provider recalls any impacting request type, OASIS 1A Issues

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should capacity be returned to the impacted request? If so, should a provider post reductions for the entire “chain” of requests? (Business Practices)

**This issue also is not addressed in the S&CP and needs standardization through business practices process. It was suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort.**

## **12. Multiple Submissions of Identical Transmission Requests / Queuing Issues**

OASIS business rules are very similar across most providers. In general, customers submitting transmission request have time periods when they can “queue” their requests. This queue process and the way it relates to the Internet can create issues when customers are “battling” for ATC on constrained interfaces.

Many customers have automated the submission of transmission requests. In order to ensure their place in the queue, these customers schedule these requests to be submitted as a scheduled event. To account for delays caused by the Internet and the nature of web server systems, customers usually submit multiple copies of the same request beginning a few minutes before the top of the hour and lasting until well after the top of the hour. The issues created by duplicate request submittal are fairly straightforward. Backend systems and the operators working those systems are impacted dramatically. Each request that arrives after the top of the hour is a valid request. Therefore, the provider can have hundreds of requests in the queue that will never be confirmed.

Other issues that are created are related to OASIS performance. Anyone using transstatus to retrieve a list of OASIS requests submitted during a time period similar to the one described above can receive hundreds of bogus requests and only a hand full of legitimate requests. Also, while the systems are busy working on the bogus requests, valid requests can be delayed due to bottlenecks created by this issue. Does there need to be a standard to limit these issues? Will FERC Order 605 address this issue? (Specification/Business Practice)

**This issue should be worked on as both a technical and business practice modification. This was discussed at length and the discussion revealed this is a very complex issue that needs to be resolved. (Note that the MIPS attempted to address this issue a couple of years ago, but their recommendations were turned down by FERC).**

### **15. ATC Updates**

There is a need to revisit the FERC requirement for ATC adjustments and posting updates. In Order 638, FERC requires adjustments to ATC off-line (internally) when the Transmission Provider accepts reservation requests and then on-line, following confirmation, the ATC posting is to be updated. FERC reasoned that use of this two-step method should reduce the number of accepted requests that will be denied service. This

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methodology tends to encourage delayed acceptance responses from Transmission Providers and has been a trigger for discontent expressed by marketers.

Over the last 3-4 years, there have been significant advances in the automation of backend systems, including calculation of ATC, which interface with OASIS. Revision of ATC postings can be made earlier now and with more certainty than before, so Transmission Providers can avoid the denials of service that once were more frequent due to ATC calculation uncertainties. A pilot project should be designed to test the concerns surrounding denial of service under a one-step method where ATC would only be adjusted upon confirmation. (Business Practice)

**While a consensus was not arrived at on this issue it might be noted that the S&CP does not address this issue but Order 889 Part 37.6b and Order 638 does.**

### **17. Announcing / Posting of OASIS Outages**

OASIS Outage posting is inconsistent across OASIS nodes. Some nodes send messages to an email list, such as [tsin@nerc.com](mailto:tsin@nerc.com) or [osc@nerc.com](mailto:osc@nerc.com). Other nodes send a message to a list managed by that TSIP.

Section 4.3.10.1 of the S&CP requires providers to post outages “When the OASIS node is out of service and transmission requests are received by the TP by phone or fax.”

Using the message template, OASIS users can download this information. All other postings of outages are at the discretion of the provider.

The reality is that many providers leave the posting of node outages to the TSIP.

Therefore, the provider has the obligation to make sure that the TSIP is posting outage information on the provider’s behalf.

The message functionality was added to provide a standard for the posting of specific



messages, such as node outage information. All OASIS outages can be posted using this standard and customers will have unilateral access to this data using the message template.

Should additional standards be implemented? How can compliance with this requirement be monitored? (Specification)

There was a consensus that this is a technical compliance and specification issue, but no consensus was reached on a method to include in this recommendation to the IT only that a specification for the notification of outages should be written.

## **18. Standardized Process for NITS service on OASIS**

### **Part(b)**

Examples:

Standardized process for NITS service on OASIS:

a) Initial service application procedure

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b) Designation of network resources

c) Addition of network resources

d) Elimination of network resources

(Specification/Business Practice)

The enumerated standardization process was identified as a business process issue that should be referred to the ESS.

## **19. Posting Reference Field**

The posting reference is a reference number that must identify the offers being posted on OASIS. The offer posting is in fact a combination of the ATC and the system data, reservations and the price information. When this data is combined to present the offers on the system the posting reference has no real meaning, as it is not clear which of the base items posting identifier is to be used. This worked fine in the past when the system data and the offers were not posted separately. This is a change or a clarification on the purpose of the post ref field. (Compliance/Clarification/Specification)

The S&CP provides guidance on the posting reference field in Section 4.3.7.1 and therefore becomes a compliance issue. There also is a clarification issue in that the S&CP references a posting reference field in Section 4.3.10.1, 4.3.10.2, and 4.3.10.3 and the Data Element Dictionary has a definition for two types of posting reference. The posting reference field needs to be redefined to split the type up into two definitions.

## **20. Other Items**

1) Naming Standardization

Standardization for items such as service points is a continuing problem in OASIS and should be addressed. (Specification/Business Practices)

This confusion over multiple names for the same physical point(s) has been a long standing issue. The major issue was identified as follows: at a point of interconnect between two providers, how is the point name established and agreed-upon such that the name is used consistently for both parties. It was agreed that this would be both a

technical and business process change for the IT and ESS to address.

## **General Issues**

### **1. Additional Standardization in OASIS Phase 1A**

Should additional standards be written for OASIS 1A while beginning OASIS Phase II initiatives? (General)

Additional standards should be written and outstanding issues addressed for OASIS Phase 1A. With all the unknowns surrounding OASIS Phase II it makes sense that the OASIS 1A Issues

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WEQ IT Subcommittee becomes involved in enhancing and maintaining the standards for OASIS Phase 1A while developing OASIS Phase II.

### **2. GUI Issue/Navigation**

Over the years there has been debate over the standardization of the HTML interface to OASIS. HTML “look & feel” requirements were intentionally left out of the S&CP.

The overwhelming majority of the OASIS How Working Group opposed the standardization of the HTML interface to OASIS. The reality is that, with the standardization of the CSV templates across OASIS nodes, vendors have the ability to provide a single interface to all OASIS nodes.

The GUI issue may have deeper roots in customer complaints and “free” OASIS usage. In other words, users of OASIS want a single “look & feel” and they want it at no cost. If standards were made concerning the HTML interface to OASIS, how would they be policed? What would be the scope of these standards? Would providers have the ability to offer a standard interface as well as an enhanced interface? (General)

At this time standardization of the HTML interface would not be beneficial and therefore not needed. With the existence of the current S&CP standards and with compliance issues resolved, standard template queries and responses should allow any Transmission Customer to perform the same functions across many OASIS nodes in virtually identical fashion.

### **8. Upgrade Planning & Progression**

Should OASIS changes be incremental? Who determines if a modification is mandatory or voluntary or both? If a modification is voluntary, how can compliance be monitored? (General)

Anytime an incremental change in OASIS standards is adopted, the change should include a migration and testing plan as part of that standard. Mr. Burden (Williams Gas Pipeline) noted that the Wholesale Gas Quadrant (WGQ) has an Interpretations Subcommittee to resolve issues of standards interpretation. It was suggested that the WEQ employ a similar approach.

### **9. Responsibility Determination**

Who is responsible for the categorization of issues? For example, given an issue, who determines if it is an implementation issue, a compliance issue, or a technical issue? (General)

There was no consensus proposal for this issue. However, for issues identified as OASIS issues, NAESB should be the governing body in determining an appropriate categorization and resolution.

OASIS 1A Issues

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## **16. NAESB Implementation of a Compliance Program**

Should an OASIS Compliance program be implemented? (General)

It was noted that this issue was discussed during the October IT meeting and was determined that NAESB does not perform a compliance function. Further, it was made clear that compliance was a function to be completed by FERC and that FERC does have a hotline established to handle compliance issues.

## **Compliance/Clarification Issues**

### **4. INFO.HTM**

The posting of information in the INFO.HTM file is inconsistent. The availability of the file across providers is also inconsistent.

Should additional standards be written to clarify the information and design of INFO.HTM? How should non-compliance be monitored? (Compliance)

It is clearly specified in the S&CP (3.4, 4.5) as to which documents should be included.

### **5. Posting of Schedules**

There is a need for compliance on the use of the OASIS template “scheduledetail” for queries and responses associated with schedules and curtailments/interruptions (see OASIS S&CP section 4.3.4.1). This is the template where FERC requires information specific to an individual schedule. There is a tendency to use the tag for this information; however, the OASIS data is currently the required source for audit information associated with schedules and curtailments/interruptions. (Compliance)

There is a compliance issue with some Transmission Providers (TPs) not posting this information in the required format as defined by S&CP (4.3.4.1).

### **6. TLR & Curtailment Posting**

There is a need for compliance on use of the OASIS template “security” for queries and responses associated with security events such as curtailments or TLR's (see OASIS S&CP section 4.3.4.2). This is the template where FERC requires information specific to the event, such as facilities involved, start time of the event, etc. Currently, the NERC website provides a central repository for such information associated with the Eastern Interconnection. There is a need to add Western Interconnection information to this repository. (Compliance/Clarification)

There is a compliance issue with S&CP (4.3.4.2) in the way that some TPs post the required events. There is also a compliance issue with some TPs not posting this information in the required format. There also is a clarification or interpretation issue in regards to which events should be posted.

OASIS 1A Issues

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## **7. Posting of Advertisements**

Should the posting of related and/or unrelated advertisements be allowed on OASIS nodes? (Clarification)

S&CP (4.3.10.1, 4.3.10.2) is somewhat vague in this area. A clarification is needed on this issue to more clearly define what types of messages are permissible. Note that this issue is complicated by the fact that many OASIS sites are hosted by external companies and a “hosted by” reference could be viewed as an advertisement.

## **13. Population of System Data**

There is a need for compliance with the S&CP on use of the OASIS template “systemdata” for queries and responses associated with ATC/TTC, etc. (see OASIS S&CP section 4.3.4.4).

This is the template that must be populated in order to meet FERC requirements associated with uploads and downloads of ATC/TTC data. Prior to publication of the S&CP version 1.4, the S&CP required provision of ATC/TTC data through use of the “transoffering” template.

When FERC required CBM data on OASIS, uploads and downloads of CBM were combined with all other system attribute data through the use of "systemdata". At the same time, use of “transoffering” for ATC/TTC data became optional. (Compliance) S&CP (4.3.4.4) already specifies the use of “systemdata”; thus it appears that some TPs may not be in full compliance with the “systemdata” template.

## **14. Ancillary Service Requests and Purchases**

There is a need for compliance on use of the several ancillary services templates in OASIS for queries and responses associated with the sale and purchase of ancillary services. FERC requires this under Order 889, and as revised. This priority may be lower due to the complexities involved and chaos in the industry associated with ancillary services, in addition to the somewhat rigid methodology provided for in the current OASIS S&CP. This will also be a requirement under OASIS II. (Compliance)

Compliance issue, the S&CP (4.3.2.2, 4.3.3.2, 4.3.8, and 4.3.9) already specifies how to handle this type of service. Further enhancements may be required in the development of OASIS Phase II.

## **18. Standardized Process for NITS service on OASIS (Use of Status Indicators)**

### **Part(a)**

Overall problem of misusing the different status indicators, e.g. setting a request to REFUSED because the request was incomplete. There is a need for a uniform interpretation of the S&CP. Specifically, making sure that similar conventions and data definitions are employed on all nodes. (Compliance)

OASIS 1A Issues

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This issue is a compliance issue with S&CP (4.2.10.2) dealing with the misuse of the status indicators.

## **18. Standardized Process for NITS service on OASIS (Difference in TP**

## **Posting and Capacity)**

### **Part(c)**

Some providers post things in “blocks” (i.e., an on-peak block), while others post everything in hourly increments (i.e., 24 discrete values). Another might be that some providers respond to a TRANSSTATUS by using CAPACITY REQUESTED and STATUS to allow a customer to derive CAPACITY\_GRANTED, while other providers specifically indicate CAPACITY\_GRANTED (and some only use CAPACITY\_GRANTED if it differs from CAPACITY\_REQUESTED).

There are different implementations all have their own unique flavor that have to be coded around. “If PROVIDER =” type statements must be written in order to catch all the node specific implementation details. Obviously you can write exception rules to deal with it, but you shouldn't have to.

If we did some standard queries against all the nodes and compared the data, we'd probably find some interesting differences. If there are valid reasons for the differences, then they should be codified in the S&CP or in Order 638. If not, they should be clarified to ensure uniform interpretation and the nodes modified to meet the clarified S&CP.

The standardization issue above is probably a good idea but it might be a little late unless we see the existence of OASIS according to the S&CP 1.4 continuing more than a couple of more years.

The key question is, is it a matter of S&CP 1.4 implementation (i.e., template access) or is it a really a matter of a TP's tariff (i.e., data content). It would not seem you could affect change to the latter (e.g., your reference to “block” vs. hourly), only the first (e.g., element name usage discrepancies).

Many solutions and associated support systems have been built around the different interpretations and implementations as they are today. Some companies may not be inclined to incur the cost to make significant changes, unless a clarified standard is issued.

A submission to FERC would be required since they are the ones responsible for enforcement of the OASIS S&CP. A validation suite should be developed.

(Compliance/Clarification)

**This issue was identified as a technical clarification issue that needed to be clarified and provided by the WEQ IT Subcommittee.**

## **19. Posting Reference Field**

### **OASIS 1A Issues**

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The posting reference is a reference number that must identify the offers being posted on OASIS. The offer posting is in fact a combination of the ATC and the system data, reservations and the price information. When this data is combined to present the offers on the system the posting reference has no real meaning, as it is not clear which of the base items posting identifier is to be used. This worked fine in the past when the system data and the offers were not posted separately. This is a change or a clarification on the

purpose of the post ref field. (Compliance/Clarification/Specification)

The S&CP provides guidance on the posting reference field in Section 4.3.7.1 and therefore becomes a compliance issue. There also is a clarification issue in that the S&CP references a posting reference field in Section 4.3.10.1, 4.3.10.2, and 4.3.10.3 and the Data Element Dictionary has a definition for two types of posting reference. There is also a need for a specification change to identified both and split the definition into parts.

# **R04011**

## **North American Energy Standards Board**

**Request for Initiation of a NAESB Business Practice Standard, Model Business Practice or Electronic Transaction**

**or**

**Enhancement of an Existing NAESB Business Practice Standard, Model Business Practice or Electronic Transaction**

### **Instructions:**

- 1. Please fill out as much of the requested information as possible. It is mandatory to provide a contact name, phone number and fax number to which questions can be directed. If you have an electronic mailing address, please make that available as well.**
  
- 2. Attach any information you believe is related to the request. The more complete your request is, the less time is required to review it.**
  
- 3. Once completed, send your request to:**  
Rae McQuade  
NAESB, Executive Director  
1301 Fannin, Suite 2350  
Houston, TX 77002  
  
Phone: 713-356-0060  
Fax: 713-356-0067

**by either mail, fax, or to NAESB's email address, naesb@aol.com.**

**Once received, the request will be routed to the appropriate subcommittees for review.**

**Please note that submitters should provide the requests to the NAESB office in sufficient time so that the NAESB Triage Subcommittee may fully consider the request prior to taking action on it. It is preferable that the request be submitted a minimum of 3 business days prior to the Triage Subcommittee meetings. Those meeting schedules are posted on the NAESB web site at [http://www.naesb.org/monthly\\_calendar.asp](http://www.naesb.org/monthly_calendar.asp).**

# R04011

## North American Energy Standards Board

### Request for Initiation of a NAESB Business Practice Standard, Model Business Practice or Electronic Transaction

or

### Enhancement of an Existing NAESB Business Practice Standard, Model Business Practice or Electronic Transaction

Date of Request: January , 2004

1. Submitting Entity & Address:

Bonneville Power Administration  
P.O. Box 491  
Vancouver, WA 98666-0491

Also PacifiCorp

2. Contact Person, Phone #, Fax #, Electronic Mailing Address:

Name : Barbara Rehman  
Title : OASIS Policy Manager  
Phone : 360 418 8079  
Fax : 360 418 8207  
E-mail : [bmrehman@bpa.gov](mailto:bmrehman@bpa.gov)

3. Description of Proposed Standard or Enhancement:

Establish a task force to review and investigate possible standards creation Associated with OASIS posting requirements under FERC Order 2003, Docket No. RM 02-1- 000, Standardization of Generator Interconnection Agreements and Procedures, Issued July 24, 2003. The effective date of the Order is January 20, 2004. See attachments for specific OASIS posting requirements under the Order.



**Request for Initiation of a NAESB Standard for Electronic Business Transactions or  
Request for Enhancement of a NAESB Standard for Electronic Business Transactions**

**Page 3**

4. Use of Proposed Standard or Enhancement (include how the standard will be used, documentation on the description of the proposed standard, any existing documentation of the proposed standard, and required communication protocols):  
**Standards created under this Request will assist the wholesale electric industry in compliance with OASIS postings required under Order 2003. Also see attachments.**
  
5. Description of Any Tangible or Intangible Benefits to the Use of the Proposed Standard or Enhancement:  
**Assist the wholesale electric industry in compliance with OASIS posting requirements under Order 2003 and provide consistent implementation across OASIS sites.**
  
6. Estimate of Incremental Specific Costs to Implement Proposed Standard or Enhancement:  
**Unknown at this point.**
  
7. Description of Any Specific Legal or Other Considerations:  
**Unknown at this point.**

**Request for Initiation of a NAESB Standard for Electronic Business Transactions or  
Request for Enhancement of a NAESB Standard for Electronic Business Transactions**

**Page 4**

8. If This Proposed Standard or Enhancement Is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement (Corporations and contacts):  
**Sponsors and potentially all OASIS nodes.**
  
9. If This Proposed Standard or Enhancement Is In Use, Who are the Trading Partners :  
**N/A**
  
10. Attachments (such as : further detailed proposals, transaction data descriptions, information flows, implementation guides, business process descriptions, examples of ASC ANSI X12 mapped transactions):
  1. **Order 2003**
  2. **Rehman Paper on Order 2003 Transmission Provider OASIS Requirements and Summary Table**

# Order 2003 Transmission Provider OASIS Requirements (Large Generation Interconnection)

Draft 12/30/03

## I. OASIS Requirements under the Standard Large Generator Interconnection Procedure (LGIP):

### A. LGIP Section 3.4:

1. The Transmission Provider shall maintain on its OASIS a list of all Interconnection Requests. The list will identify, for each Interconnection Request:

(i) the maximum summer and winter megawatt electrical output; (ii) the location by county and state; (iii) the station or transmission line or lines where the interconnection will be made; (iv) the projected In-Service Date; (v) the status of the Interconnection Request, including Queue Position; (vi) the type of Interconnection Service being requested; and (vii) the availability of any studies related to the Interconnection Request; (viii) the date of the Interconnection Request; (ix) the type of Generating Facility to be constructed (combined cycle, base load or combustion turbine and fuel type); and (x) for Interconnection Requests that have not resulted in a completed interconnection, an explanation as to why it was not completed.

2. Mask the identify of the Interconnection Customer until Customer executes an LGIA or requests that the TP file an unexecuted LGIA with FERC.
3. Post on OASIS any deviations from the study timelines set forth in the LGIP along with explanation for the delay (see Docket No.RM02-1-000, paragraph 115).
4. Post on OASIS Interconnection Study reports (not actual studies) and Optional Interconnection Study reports subsequent to the meeting between the Interconnection Customer and the TP to discuss applicable study results.
5. Post any known deviations in the In-Service Date.

### B. LGIP Section 3.3.2 **[no posting required, unless automated]**

The TP shall acknowledge receipt of the Interconnection Request within five (5) Business Days of receipt of the request and attach a copy of the received Interconnection Request to the acknowledgement.

### C. LGIP Section 3.6 Withdrawal

The TP shall update the OASIS Queue Position posting in the event of Withdrawal.

### D. LGIP Section 4.1 Queue Position **[no posting required; information only]**

The Queue Position is based on the date and time of receipt of the valid Interconnection Request.

### E. LGIP Section 4.2 Clustering

Any changes to the established Queue Cluster Window interval and opening or closing dates shall be announced with a posting on the TP's OASIS, beginning at least one hundred and eighty (180) Calendar Days in advance of the change and continuing thereafter through the end date of the first Queue Cluster Window that is to be modified.

### F. LGIP Section 4.3 Transferability of Queue Position **[may required posting change]**

Any Interconnection Customer may transfer its Queue Position to another entity only if such entity acquires the specific Generating Facility identified in the Interconnection Request and the Point Of Interconnection (POI) does not change.

- G. LGIP Section 4.4 Modifications **[may require posting change]**  
The Interconnection Customer shall retain its Queue Position if the modifications are In accordance with Sections 4.4.1, 4.4.2, or 4.4.5 or are determined not be Material Modifications pursuant to Section 4.4.3.

**II. OASIS Requirements under the Standard Large Generator Interconnection Agreement (LGIA):**

- A. LGIA Section 9.7.1.2 Outage Schedules  
The TP shall post scheduled outages of its transmission facilities on the OASIS.

## SUMMARY OF TP OASIS POSTING REQUIREMENTS UNDER ORDER 2003

	OASIS Posting Requirement	Reference	Notes/Issues
1	The maximum summer and winter megawatt electrical output	LGIP Section 3.4, (i)	See Appendix 1, 4.b. Interconnection Request Template
2	The type of Interconnection Service being requested	LGIP Sections 3.2 and 3.4, (vi)	See Appendix 1, 3. Types = Energy Resource Interconnection Service (ER) or Network Resource Interconnection Service (NR)
3	Date of the Request	LGIP Section 3.4, (viii)	See Appendix 1, 9.
4	The station or transmission line or lines where the interconnection will be made	LGIP Section 3.4, (iii)	<u>Possibly</u> included under Appendix 1, 4.a. (address) or f. (POI approx. location)
5	Status of Request including Queue Position	LGIP Section 3.4, (v)	Some Standard OASIS status value definitions could apply (See S&CP, Sec. 4.2.10.2 and Exhibit 4 -1 – State Diagram), for the States: QUEUED (see LGIP, section 4.1), INVALID (see LGIP, section 4.1), RECEIVED (see LGIP, section 4.1), STUDY, WITHDRAWN, and ANNULLED. Some definitions might need to be modified to clearly apply also to Interconnection Requests, including: DECLINED, CONFIRMED, REFUSED, ACCEPTED, and RETRACTED. TRANSFERRED could be a new state value when Queue Position is transferred to another entity. Implementation of Queue Position is complicated by the issue of required integrated queue per geographic region (see Docket No. RM02-1-000, paragraph 147).
6	Type of Generating Facility to be constructed and fuel type	LGIP Section 3.4, (ix)	<u>Possibly</u> included under Appendix 1, c. Generating Facility Types include: combined cycle, base load or combustion turbine
7	Explanation if Request has not resulted in a completed interconnection	LGIP Section 3.4 (x)	The period for this posting could be greater than 10 yrs from date of Request (see LGIP Section 3.3.1.) This could hamper automation of OASIS postings on Interconnection Requests if tracking Requests is desired. Current OASIS template data only retained for 3 yrs
8	Mask identity of Interconnection Customer until Customer executes an LGIA or requests that TP to file an unexecuted LGIA with FERC.	LGIP Section 3.4	May require internal protocol for posting LGIA information, unless automated. This could be more complex than current OASIS unmasking procedures.
9	Any deviations from the study timelines set forth in the LGIP along with explanation for the delay.	Docket No. RM02-1-000, paragraph 115	May require internal protocol for posting timeline deviation information, unless automated.
10	Interconnection Study reports (not actual studies) and Optional Interconnection Study reports subsequent to the meeting between the Interconnection Customer and the TP to discuss applicable study results.	LGIP Section 3.4	May require internal protocol for posting Study reports subsequent to meeting on applicable study results, unless automated.
11	Any known deviations in the In-Service Date.	LGIP Section 3.4	May require internal protocol for In-Service Date deviation information, unless automated.
12	Update the OASIS Queue Position posting in the event of Withdrawal	LGIP Section 3.6	May require internal protocol for Withdrawal information, unless automated.
13	Any changes to the established Queue Cluster Window interval and opening or closing dates, beginning at least one hundred and eighty (180) Calendar Days in advance of the change and continuing thereafter through the end date of the first Queue Cluster Window that is to be modified.	LGIP Section 4.2	May require internal protocol for information on established Queue Cluster Window interval and opening or closing dates, at least 180 days in advance of change through end date of changed Window, unless automated.
14	Scheduled outages of its transmission facilities.	LGIA Section 9.7.1.2	OASIS Template <i>security</i> may be used for this. See S&CP section 4.3.4.2. Unclear whether all scheduled outages must be posted or only related outages.

15	The location by county and state	Section 3.4, (ii)	Interconnection Request Template does <u>not</u> require "county" information
16	The projected" In-Service" date	Section 3.4, (iv)	Interconnection Request Template requires "Commercial Operation Date" only
17	Availability of studies related to the Request	Section 3.4, (vii)	Interconnection Request Template does <u>not</u> require this information.
18	Lower Queue Position for moving POI, if deemed a Material Modification under Section 4.4.3.	Section 4.1	LGIP does not indicate where to place Request that changes the POI, except that it shall be "lower". Possible BP needed here.

**Legend:**

<b>Postings may be taken from Interconnection Request information; easy to automate.</b>
<b>May require modifications to Request template and OASIS S&amp;CP Status Value definitions for automation of postings on OASIS. Tracking of Requests for Section 3.4 (x) will be difficult to maintain because of potential length of time involved. May require internal protocols for postings.</b>
<b>Requires modifications to Request template for automation of postings on OASIS.</b>



## North American Energy Standards Board

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**via email and posting**

**TO:** NAESB WEQ Business Practices Subcommittee Participants  
**FROM:** Rae McQuade, Executive Director  
**RE:** Request for Standards Development and Timeline and Deliverable Dates for Preparing "Version 0" Business Practices  
**DATE:** May 13, 2004

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Dear WEQ BPS Interested Parties,

The WEQ BPS met on May 11 to discuss the transition of the business practices in the existing NERC policies from those NERC policies to NAESB business practices. The goal of the meeting was twofold – to finalize the request for standards development, and to set a timeline and deliverables deadlines that coincide with NERC's Transition Plan for developing "Version 0" reliability standards.<sup>1</sup> The request was unanimously endorsed by the BPS on May 11 and is attached for your information. The timeline also attached, was drafted by the NAESB office with the BPS leadership in coordination with NERC and the ISO RTO Council.

Please note that the intent of the request is to develop "Version 0" business practices that complement the "Version 0" reliability standards. "Version 0" reflects the business practices from the reliability operating policies, planning standards and compliance templates in effect today, with language changes for consistency with the NERC functional model.

Best Regards,

*Rae McQuade*

Rae McQuade

Executive Director, North American Energy Standards Board

cc: WEQ Executive Committee Members  
Mark Fidrych  
Glenn Ross  
Mike Grim  
Linda Campbell  
Gerry Cauley  
Bill Lohrman  
Don Benjamin

Gordon Scott  
Michael Desselle  
Lou Oberski  
Steve Cobb  
Phil Cox  
Joel Dison  
DeDe Kirby  
Todd Oncken

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<sup>1</sup> The NERC Accelerated Transition Plan can be downloaded from:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/Accelerated-Standards-Transition-Plan-Draft-4-19-04-FINAL.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/Accelerated-Standards-Transition-Plan-Draft-4-19-04-FINAL.pdf)



# North American Energy Standards Board

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## **WHOLESALE ELECTRIC QUADRANT BUSINESS PRACTICES SUBCOMMITTEE MEETING SCHEDULE OF EVENTS AND MILESTONES TO PREPARE "VERSION 0" BUSINESS PRACTICES**

<b>Date</b>	<b>Time</b>	<b>Location</b>	<b>Event</b>
May 11	1 - 4 P Central	Houston	NAESB WEQ BPS Meeting
May 20-21	All Day	Chicago	NERC Standards Drafting Team Meeting
June 9-11	All Day	Chicago	NERC Standards Drafting Team Meeting
June 17-18	All Day	Columbus, OH	NAESB WEQ BPS Meeting
June 28-30	All Day	Chicago	NERC Standards Drafting Team Meeting
July 1-2	All Day	Chicago	NAESB WEQ BPS Meeting
July 2			Distribution of NERC Version 0 Reliability Standards Draft 1 for comment
July 6			Distribution of NAESB Version 0 Business Practice Standards Draft 1 for comment - comments to be returned by August 6
July 13	Afternoon	Salt Lake City	Proposed JIC Meeting where the two version 0 requests (the SAR from NERC and the request from NAESB) will be presented for JIC review and assignment - presumably to NERC and NAESB.
Aug 6			Comments returned to NAESB on proposed standards included in Draft 1 of the NAESB Version 0 Business Practice Standards
Aug 11-13	All Day	??	NERC Standards Drafting Team Meeting
Aug 17-18	All Day	Houston	NAESB WEQ BPS Meeting
Aug 24	All Day	Colorado Springs	NAESB WEQ EC Meeting
Aug 30			Distribution of NERC Version 0 Reliability Standards Draft 2 for comment
Aug 30			Distribution of NAESB Version 0 Business Practice Standards Draft 2 for comment - comments to be returned by September 30
Sep 30			Comments returned to NAESB on proposed standards included in Draft 2 of the NAESB Version 0 Business Practice Standards
Oct 12-13	All Day	Washington DC	NAESB WEQ BPS Meeting
Oct 25			Distribution of NERC Version 0 Reliability Standards Draft 3 for comment
Oct 25			Distribution of NAESB Version 0 Business Practice Standards Draft 3 for comment - comments to be returned by November 25





# North American Energy Standards Board

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## **WHOLESALE ELECTRIC QUADRANT BUSINESS PRACTICES SUBCOMMITTEE MEETING SCHEDULE OF EVENTS AND MILESTONES TO PREPARE "VERSION 0" BUSINESS PRACTICES**

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<b>Date</b>	<b>Time</b>	<b>Location</b>	<b>Event</b>
Nov 16	All Day	Washington DC	NAESB WEQ EC Meeting
Nov 25			Comments returned to NAESB on proposed standards included in Draft 3 of the NAESB Version 0 Business Practice Standards. Comments forwarded to the WEQ EC for consideration with Draft 3 for vote.
Nov 30	All Day	Tampa	WEQ EC Meeting, EC vote on proposed standards included in Draft 3 proposed standards including consideration of comments submitted on November 25.
Nov 30			Assuming the proposed standards are adopted by the EC on November 30, the EC-endorsed proposed standards are sent out to the WEQ membership for ratification.
Dec 30			Ratification ballot due back to the NAESB office. Assuming results indicate that members ratify EC-endorsed proposed standards, they are considered NAESB standards.

**R04013**  
**North American Energy Standards Board**

**Request for Initiation of a NAESB Business Practice Standard, Model Business Practice or  
Electronic Transaction**  
**or**  
**Enhancement of an Existing NAESB Business Practice Standard, Model Business Practice or  
Electronic Transaction**

**Date of Request:** May 13 2004

**1. Submitting Entity & Address:**

WEQ Business Practices Subcommittee

**2. Contact Persons, Phone #, Fax #, Electronic Mailing Address:**

<b>Name :</b>	Phil Cox	Mr. Joel Dison
<b>Company:</b>	American Electric Power	Southern Company
<b>Title :</b>	Transmission and Markets Analyst	Manager of Market Policy
<b>Phone:</b>	614-324-4598	(205) 257-6481
<b>Fax :</b>	614-583-7505	(205) 257-6824
<b>E-mail :</b>	epcox@aep.com	jjdison@southernco.com

**3. Description of Proposed Standard or Enhancement:**

Prepare business practices that support NERC's reliability practices and functional model terminology reflective of today's implementation. This request should be considered a companion request to the NERC Standards Authorization Request for Version 0 Reliability Standards.

The NERC Board of Trustee-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 balloted in April 2004 – will be translated into an initial baseline (Version 0) set of business practice standards. The list of items can be found as an attachment – see item 10 of this request.

As NERC notes in its SAR:

There are several important reasons for accelerating the transition from existing operating policies and planning standards to a single set of reliability standards under the ANSI-accredited process:

a The August 14 blackout has challenged NERC and the industry to demonstrate that its reliability standards are unambiguous and measurable – now.

b The U.S./Canada Power System Outage Task Force final report of April 5, 2004 states in Recommendation 25: "NERC should reevaluate its existing reliability standards development process and accelerate the adoption of enforceable standards."

c An April 14, 2004 Order of the Federal Energy Regulatory Commission (FERC) states a policy objective addressing "the need to expeditiously modify [NERC] reliability standards in order to make these standards clear and enforceable."

d The continued use of multiple formats, processes and forums for developing and maintaining reliability rules is an inefficient dilution of industry and staff resources.

e The transition to new standards and retiring of existing operating policies and planning standards will be too complex for industry implementation if taken one standard at a time over several years.

NERC's reliability policies have essential business practice elements that integrally support the reliability standards. However, from NAESB's perspective, such business practice standards when adopted would be voluntary. Regulatory agencies may then take their own subsequent actions to make such standards jurisdictionally enforceable. NAESB will coordinate its filing with the FERC to coincide with NERC adoption of the Version 0 standards.

**4. Use of Proposed Standard or Enhancement (include how the standard will be used, documentation on the description of the proposed standard, any existing documentation of the proposed standard and required communication protocols):**

These business practice standards will be drafted to implement existing business practices as they reside in NERC's current reliability operating policies and planning standards effective today:

- a. Extract the business practices from the existing reliability rules – namely the existing Board-approved operating policies and planning standards, the 38 compliance templates approved by the NERC board on April 2, and all approved revisions to Operating Policies 5, 6, and 9 balloted in April 2004 – into an initial baseline (Version 0) set of business practice standards.
- b. Follow NERC's effort to identify the Functional Model designation for each performance requirement and measure in the Version 0 standards, and reflect the same functional model terminology in NAESB business practices.
- c. Work collaboratively with NERC to identify sections of the existing operating policies and planning standards that are suitable for NAESB to incorporate into NAESB "Version 0" business practice standards.

**5. Description of Any Tangible or Intangible Benefits to the Use of the Proposed Standard or Enhancement:**

As described above, these complementary business practice standards are integral to the operation and enforceability of NERC's reliability standards. The collaborative effort with NERC to prepare a Version 0 foundation of business practices will serve as a cornerstone for future NAESB business practice standards development.

**6. Estimate of Incremental Specific Costs to Implement Proposed Standard or Enhancement:**

There should be no additional costs to implement the business practices supporting Version 0 reliability standards as these business practices are in effect today in NERC's operating policies and planning standards.

**7. Description of Any Specific Legal or Other Considerations:**

NAESB should continue to coordinate with NERC as the Version 0 business practices are developed to ensure that they fully support and track NERC's reliability standards.

**8. If This Proposed Standard or Enhancement Is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement (Corporations and contacts):**

There should be no additional testing required to implement the business practices supporting Version 0 reliability standards as these business practices are in effect in current NERC operating policies and planning standards today.

**9. If This Proposed Standard or Enhancement Is In Use, Who are the Trading Partners:**

Please see the response to item 8.

**10. Attachments and reference materials (such as : further detailed proposals, transaction data descriptions, information flows, implementation guides, business process descriptions, examples of ASC ANSI X12 mapped transactions):**

NERC operating policies, planning standards, and compliance templates

<http://www.nerc.com/~oc/pds.html> (operating policies)

<http://www.nerc.com/~oc/standards/> (revised operating policy 5, 6, 9)

<http://www.nerc.com/~filez/pss-psg.html> (planning standards)

<http://www.nerc.com/~comply/annual.html> (compliance templates)

Functional model

<http://www.nerc.com/~filez/functionalmodel.html>

NERC Transition Plan

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/Accelerated-Standards-Transition-Plan-Draft-4-19-04-FINAL.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/Accelerated-Standards-Transition-Plan-Draft-4-19-04-FINAL.pdf)

SAR – Version 0 reliability standards development

<http://www.nerc.com/~filez/standards/Version-0.html>

## **APPENDIX II: Meeting Minutes**

### Wholesale Electric Quadrant Executive Committee Meetings\* :

February 24, 2004  
November 16, 2004  
November 30, 2004

### Joint Interface Committee Meetings:

February 18-19, 2004  
July 16, 2004  
August 16, 2004

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\* The attachments to WEQ EC minutes have not been included in this appendix due to their size, but are available for download from the NAESB web site. Please contact the NAESB office (713-356-0060 or [naesb@naesb.org](mailto:naesb@naesb.org)) for assistance in locating the documents.



# North American Energy Standards Board

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March 7, 2004

**TO:** NAESB Wholesale Electric Quadrant Executive Committee and Interested Industry Participants  
**FROM:** Todd Oncken, NAESB Deputy Director  
**RE:** WEQ Executive Committee Meeting Final Minutes – February 24, 2004

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**NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING  
WHOLESALE ELECTRIC QUADRANT (WEQ)  
Tuesday, February 24, 2004 – 10:00 am to 4:00 pm Central  
Hosted by NAESB – Houston, Texas  
Final Minutes**

**1. Welcome**

Mr. Oberski called the meeting to order. Mr. Oncken gave the antitrust advice and called the roll of Executive Committee members. Quorum was established.

**2. Wholesale Electric Quadrant Draft Agenda & Draft Minutes**

Mr. Oberski reviewed the draft agenda. A discussion of the NERC Alliance West Task Force (AWTF) was added under subcommittee updates. Mr. Dison moved, seconded by Mr. Norris to adopt the amended agenda. The agenda was adopted without modification.

The draft minutes from the December 9, 2004 Wholesale Electric Quadrant (WEQ) Executive Committee meeting were reviewed. Mr. Cobb moved, seconded by Mr. Reed, to adopt the minutes without modification. The motion passed unanimously.

**3. Triage Recommendations**

Request R04005: Mr. Dison reviewed Request R04005 (OASIS Baseline), noting it would form a foundation within NAESB for the current OASIS business practices and S&CP. Mr. Dison stated the Triage Subcommittee recommended Request R04005 was within NAESB scope, properly assigned to the WEQ, and should be worked on by the Electronic Scheduling Subcommittee (ESS) in high priority.

Request R04006: Mr. Dison reviewed Request R04006 (OASIS 1A Enhancements), which would produce modifications to OASIS 1A based on the deliverables of the OASIS Scheduling Collaborative. Mr. Dison stated the Triage Subcommittee recommended Request R04006 was within NAESB scope, properly assigned to the WEQ, and should be worked on jointly by the ESS and Information Technology Subcommittee (ITS) in the normal course of business.

Request R04007: Mr. Dison reviewed Request R04007 (OASIS Phase II). Mr. Dison stated the Triage Subcommittee recommended Request R04007 was within NAESB scope, properly assigned to the WEQ, and should be worked on by the ESS and ITS in the normal course of business.

Mr. Dison moved, seconded by Mr. Reed, to accept the Triage Subcommittee recommendations for Request R04005, R04006 and R04007. After limited discussion the motion passed unanimously.

Request R04011: Ms. Rehman discussed Request R04011. She stated there are approximately 18 requirements under FERC Order 2003 that relate to OASIS posting. Mr. Oberksi stated the



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Triage Subcommittee recommended Request R04011 was within NAESB scope, properly assigned to the WEQ, and should be worked on by the ESS and ITS in the normal course of business. During discussion it was noted that the subcommittee assignment recommendation was appropriate since the nature of the work would be determined by the solution proposed, and could include either a change to business practices or the S&CP. Mr. Dison moved, seconded by Mr. Johnson, to accept the Triage Subcommittee recommendation for Request R04011. During discussion it was noted that the item has preliminarily been assigned to the OASIS 1A Task Force. The motion passed unanimously.

Request R03035: Mr. Oberski reviewed the status of Request R03035, which addresses gas quality. Mr. Oberski stated the determination of scope is an all-EC issue, and in this case the Wholesale Gas Quadrant found the request out of NAESB scope. As a result, the scope determination was referred to the Board of Directors where the Board Managing Committee found the request in scope – a decision that was subsequently ratified by the whole Board through notational ballot. He noted no action was required from the WEQ on this request, but thought the Executive Committee should be updated on its procedural status. Ms. McQuade noted the issue would likely be discussed extensively at the March Board meeting.

Concern was expressed about the WEQ's level of participation in the Triage Subcommittee. Mr. Oberski noted that WEQ participation at the follow up conference calls to adopt the Triage Subcommittee recommendations on scope and quadrant assignment was also concerning, since those issues required approval of the entire Executive Committee for all requests.

#### 4. Subcommittee Updates

Business Practices Subcommittee: There was no report for the Business Practices Subcommittee.

Inadvertent Interchange Payback Task Force: Mr. Terelmes provided the update for the Inadvertent Interchange Payback Task Force (IIPTF). Mr. Terelmes reported participation and interest in the task force has increased. Mr. Terelmes stated an open issue for the task force was the format of standards for submission to the Executive Committee. Mr. Terelmes reviewed recent actions by the subcommittee, including the decision to define the concept of frequency bandwidth and consider different solutions according to bandwidth. Mr. Terelmes noted that antitrust concerns ~~of price-fixing~~ (a motion was crafted that a participation alleged provided a defined as a non-economic basis for a price) were ~~stated-raised~~ at the January IIPTF meeting regarding a pending motion, and those concerns have subsequently been resolved by NAESB's General Counsel with the decision that there were no antitrust concerns with language of the motion.

The Executive Committee discussed the IIPTF deliverables. Mr. Terelmes stated the IIPTF has set an internal deadline of October for recommendations to the Executive Committee. Mr. Terelmes referenced the substantive motions document maintained by the IIPTF and suggested review of the document would help the Executive Committee monitor the task force's progress. Mr. Terelmes stated that most of the successful motions have been general, but the task force is moving to a different level of granularity. Mr. Dison suggested the IIPTF submit multiple recommendations to the Executive Committee, instead of one recommendation in October, so that the Executive Committee could better understand work of the IIPTF and provide feedback on the direction the task force was taking. Ms. McQuade agreed that process could be beneficial, especially in instances when the draft standards are controversial. Mr. Terelmes stated the IIPTF would discuss the option of multiple recommendations at its February 26-27 meeting in Houston at the NAESB Offices.



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Information Technology Subcommittee: Mr. Johnson reported on the Information Technology Subcommittee (ITS), noting the subcommittee has met once since the last Executive Committee meeting. Mr. Johnson said the ITS has begun its work on Request R04006 (OASIS 1A enhancements) through the OASIS IA Task Force to determine the proper resolution for each of the five items. Mr. Johnson noted that the task force is working jointly with the ESS OASIS 1A Task Force and the group has just begun its work. Additionally, Mr. Johnson reported that the OASIS Phase II Structural Design Task Force has evaluated the OASIS II use cases and determined that development of OASIS Phase II has not moved far enough to being working on the functional specifications or S&CP. Mr. Johnson said the OASIS Phase II Structural Design Task Force report will be distributed to the ESS and ITS for a 30-day comment period.

Mr. Johnson reported the ITS and ESS have decided to hold joint meetings to discuss joint issues, such as the OASIS 1A enhancements and OASIS Phase II. The next ITS and ESS meetings will be held on April 5-7 hosted by California ISO in Folsom, CA.

Electronic Scheduling Subcommittee: Mr. Dison's report on the ESS included a brief review of the February 17-18 meeting, discussion and consideration of Recommendation R04005, a review of the work of the Coordinate Interchange Business Practices Task Force (CIBPTF), and a presentation on OASIS Phase II development and coordination.

Mr. Dison presented Recommendation R04005 (OASIS Baseline). Mr. Dison stated the recommendation consists of OASIS business practices that have been derived from various FERC Orders and the most recent version of the S&CP. Mr. Dison explained that the recommendation adopts current rules being followed by FERC-jurisdictional entities as NAESB standards. Mr. Dison stated the recommendation was voted out of the ESS in January and posted for industry comment shortly thereafter. Mr. Dison also noted that all comments received were reviewed at the February ESS meeting.

Mr. Dison moved, seconded by Mr. Reed, to accept the recommendation of the ESS to accept Recommendation R04005, modified to change the reference date for Attachment B to July and to delete Attachment D. During discussion on the motion, it was noted that the referenced modifications were necessary to correct a typographical error and remove duplicate language since Attachment D was incorporated in Attachment B. Mr. Oberski commented that this issue was discussed at the December Executive Committee meeting. Further, it was noted that the process used in the development and adoption of this recommendation in no way violated the ANSI-approved NAESB standards development process. All Executive Committee members present voted in favor of the motion, but the results of the motion were undetermined because there were not enough members of the end user or distribution/LSE segments to pass the voting threshold. Subsequent to the meeting, votes in favor of the motion were received and the motion passed unanimously.

Mr. Dison stated the CIBPTF presented its draft standard at the February ESS meeting. Mr. Dison said the CIBPTF standard represents the business practices associated with NERC's Coordinate Interchange standard and NERC Policy 3. After extended discussion and several modifications, the ESS voted the CIBPTF standard out of subcommittee as a recommendation to the Executive Committee. Mr. Dison noted the recommendation is out for an extended industry comment period (45 days). Mr. Dison stated the Executive Committee will be asked to consider and vote on Recommendation R03013 at its May meeting.

Mr. Dison gave a presentation titled, *OASIS II – A Vision of the Future*. Mr. Dison reviewed the trends and risks for the industry, provided several recommendations for moving forward, proposed a timeline and phased approach for OASIS II, and proposed an organizational





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structure for the development of OASIS II. Mr. Dison's presentation is posted as a work paper for this meeting.

Participants discussed Mr. Dison's presentation. During discussion, Mr. Dison noted that the ESS and ITS would form the joint OASIS II Task Force at its April meeting. Additionally, the importance of coordination with NERC regarding both the status of the Functional Model and the extension of current tools was highlighted. Additionally, it was noted that although Mr. Dison's proposal relies on the assumption that the Functional Model will be adopted, the design of OASIS Phase II is not limited to that model. Mr. Desselle briefly reviewed the current efforts regarding transitioning the current NERC Policies into reliability and commercial standards.

Glossary Subcommittee: Mr. Reed reported on the Glossary Subcommittee. He stated the work of the subcommittee is progressing, though at a slower pace than originally intended. Mr. Reed stated the task force is creating a working glossary by pooling data from existing sources and evaluating like terms. Once that is complete, he said the document would be distributed for industry comment and the subcommittee would meet to discuss the content of the document. Additionally, he noted a meeting has been scheduled between Glossary Subcommittee leadership and the ISO glossary team to discuss the work of each organization and any opportunities for collaboration.

During discussion it was noted that the primary objective of the Glossary Subcommittee is to focus on the content of the definitions, not a software solution to house the glossary. Mr. Desselle suggested that infrastructure would likely be discussed at the upcoming meeting with the ISO glossary group. Mr. McCoy said a glossary effort was critical so that the standards drafting groups would be using terms consistently. He noted this effort could benefit the NERC standards drafting as well.

Standards Review Subcommittee: Mr. Yeung gave the report on the Standards Review Subcommittee (SRS). He stated the SRS spent significant time at the last meeting reviewing additional proposed NERC SARs or standards, but discovered the items were not far enough along in the process so that the SRS could make a full assessment of commercial implications. He stated the SRS is continuing its review of NERC's Coordinate Operations (CO) draft standard and Operate Within Limits (OWL) draft standard. Mr. Yeung noted that the SRS has asked the NERC Markets Committee (MC) to provide an opinion regarding the level of consistency needed for reliability, since that need for consistency could lead to a complementary business practice related to NERC's OWL standard. Ms. Rehman noted there were open questions to the MC regarding NERC Balance Resources and Demand draft standard and ATC.

The SRS will meet February 25, 2004 in Houston, TX. Mr. Yeung stated the CO and OWL will be discussed. Additionally, he stated for the review of the OWL, the SRS would probably review NERC Appendix 9(c)(1) to identify the areas that are business practices. It was noted that the NERC Reliability Coordinators Working Group has completed a review of Policy 5, 6, 9 and Appendix 9d, and forwarded those documents to the NAESB Office.

Seams Subcommittee: Mr. Cobb reported on the Seams Subcommittee. He stated that following the December Executive Committee meeting, where the Seams Catalog was approved by the Executive Committee without any recommendations on assignment, the Seams Subcommittee held several conference calls and a meeting to make recommendations on assignment and gain consensus on those recommendations. Mr. Cobb reviewed the methodology used by the subcommittee to develop the recommendations. He noted NERC went



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through a similar process. Mr. Cobb stated that the Seams Catalog was presented to the Joint Interface Committee on February 18-19, 2004.

Mr. Desselle reviewed the JIC discussion of the Seams Catalog. He stated the JIC reviewed the NAESB recommendation and NERC recommendation on assignment, and accepted the recommendation on those 97 items where the recommendations matched. Mr. Oberski added that the JIC decided to label the remaining 37 items as undecided. Mr. Desselle noted that the JIC will have the opportunity to review the Seams Catalog items assigned to NERC or NAESB as individual requests for standards are developed and processed. However, he noted there is no such requirement for items assigned to the IRC, or undecided items the IRC decides to address.

The Executive Committee briefly discussed the items assigned to NAESB and the undecided items. Mr. Desselle suggested the Seams Subcommittee review those items assigned to NAESB and the undecided items and determine if, and where, they fit into the 2004 WEQ Annual Plan. Further, it was noted the NAESB items should be reviewed by the subcommittee for priority. Finally, it was agreed that the industry would have the opportunity to provide feedback on the importance of the undecided issues. Mr. Cobb noted several significant issues were left undecided, such as ATC. Industry participants with a particular interest in either the NAESB items or undecided items should file a request for standards to begin the standards development process.

Gas Electric Coordination Task Force: Mr. Oberski reported on the Gas Electric Coordination Task Force (GECTF), a four-quadrant task force that is addressing WEQ Annual Plan Item 4. He stated the GECTF has held two, two day meetings, and the next meeting is scheduled for March 15-16 in Houston, TX. Mr. Oberski said the GECTF has held a general information session, developed a preliminary issues list, and has begun working through the concepts on that list. He noted that while the meetings have been cordial, some serious discussion and tough questions have been asked. Mr. Oberski stated WEQ support and participation in the GECTF very important, especially since the issue originated from the WEQ Annual Plan.

The Executive Committee discussed the participation issue. Mr. Johnson questioned if the lack of participation signaled that the WEQ did not view the coordination as an important issue. Mr. Desselle noted that the coordination of gas and electricity is a global issue that is getting attention at the FERC, and was in fact discussed at the January FERC meeting. Mr. Oberski commented that the work being done by the GECTF could have some real impacts on the way business is done on the electric side, e.g. different procedures for working with the pipelines when citing a new gas-fired generation plant. Ms. Westerfield committed to discuss the participation issue with state regulatory staff, because the importance of the interdependency of the industries and associated price issues. She noted the interdependence could have real impacts for alternative fuel sources. Mr. Hughes stated that this issue has reached the CEO level in the industrial industry. Mr. Desselle noted the issue has also been raised to EEI.

Alliance West Task Force (NERC): Mr. Green, the NAESB representative on the Alliance West Task Force (AWTF), provided a report. Mr. Green reviewed the findings of the AWTF, including the determination that the reliability impact was caused by large volumes of small transactions on the impacted interfaces. Mr. Green stated the AWTF has drafted several recommendations and will report back to the MC in March. Mr. Green stated some of the recommendations are focused on Summer 2004, but others have longer term impacts. Mr. Green stated that he intends to support short term recommendations because the region is experiencing some real reliability issues, but oppose the longer term recommendations because the task force should not be addressing long-term issues. No one disagreed with Mr. Green's approach.



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Mr. Green reviewed the potential recommendations (a report is not yet available), as follows: 1) revise the methodology for calculating TRM – the holdback for uncertainties; or 2) reduce the threshold for impacted entities in a TLR from 5% to 3%. Mr. Green noted these recommendations have large impacts, especially since lowering the TLR threshold would affect a huge number of transactions in a huge geographic region. Mr. Green stated the long term solution would be better coordination of transmission sales. Mr. Green contended that was clearly a NAESB or NERC issue, depending on which organization is assigned ATC issues, and not an issue the AWTF should address.

Mr. Dison suggested the long term issue requires a commercial solution. To move forward, Mr. Oberski stated a standards request should be drafted and submitted. He suggested that standards request should explain why a commercial solution is appropriate. He noted any request will proceed through the JIC process. Given the discussion of the issue, it was suggested that the Seams Subcommittee shepherd this issue through the process. Mr. Yeung noted that the SRS's previous review of an ATC standard produced negative comments.

### **5. JIC Meeting Summary**

Please see discussion above.

### **6. Nominations and elections**

BPS Chair: Mr. Oberski stated that since Mr. Goss is on assignment in Iraq, a co-chair should be elected for the Business Practices Subcommittee (BPS). It was noted that since Mr. Goss is an Executive Committee member, the co-chair does not have to be an Executive Committee member. Mr. Cobb moved, seconded by Mr. Reed, to elect Phil Cox as the BPS co-chair. The motion passed unanimously.

GECTF Chair: Mr. Oberski stated that since Mr. Jackson retired he has served as the interim co-chair of the GECTF. Ms. Westerfield and Mr. Porter of TVA volunteered to serve as co-chairs. Mr. Hughes moved, seconded by Mr. Ulch, to elect Ms. Westerfield and Mr. Porter as the WEQ co-chairs of the GECTF. The motion passed unanimously.

### **7. New Business**

Transition Issues - NERC Policies 3, 5, 9: Mr. Desselle presented this topic. He stated NAESB is trying to be proactive in the transition of business practices out of the NERC Policies. To that end, he said the NERC Policies should be evaluated for portions that are business practices and then NAESB standards requests should be drafted for the identified sections. Mr. Desselle said this would be a collaborative effort with NERC. The BPS was assigned the task of working on this project.

During discussion, concern was expressed about the implications of incorporating the current NERC Policies into NAESB standards and the potential of those standards to be adopted by the FERC. It was noted that the proposal is to include the NERC Policies as written, but regional differences could be recognized where appropriate. Additionally, Executive Committee members found it important to develop a transition plan for the transition from NERC Policies to NAESB business practice standards, and in fact noted that as an overriding concern in cases where there would be complementary business and reliability standards. Ms. Rehman suggested the transition should be expanded to include planning standards, such as the standards on ATC.

ISO/RTO WEQ representation: Mr. Desselle encouraged the Executive Committee members to seriously consider creating a separate segment for ISO/RTO representation. Mr. Oberski identified this topic as an agenda item for the May meeting. It was noted that the original



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proposals for an ISO/RTO segment was posted on the NAESB web site on the page dedicated to WEQ formation.

### Future Meetings:

March 24, 2003 – Joint meeting with NERC MC in Nashville

March 18, 2004 – NAESB Board meeting in Houston

May 4, 2004 - WEQ Executive Committee Meeting in Florida hosted by FPL.

### **8. Adjourn**

The meeting adjourned at 4:25 p.m. Central

### **9. Executive Committee Attendance and Voting Record**

<b>End User Segment</b>		<b>Attendance</b>	<b>Rec. R04005</b>
John Hughes	Director Technical Affairs, Electricity Consumers Resource Council (ELCON)	In Person	In Favor
V A C A N C Y	V A C A N C Y		
Steve Sayuk	Manager Americas Supply, Power & Gas Services Group, ExxonMobil Power & Gas Services, Inc.	Absent	In Favor (notational)
Randy Corbin	Assistant Director Analytical Services, Ohio Consumers' Counsel	Absent	
Paul Jett	Manager of Electric System Operation Customer Choice Transition, Cinergy Services Inc.	Absent	
Lou Ann Westerfield	Policy Strategist, Idaho Public Utilities Commission, rep. National Association of Regulatory Utility Commissioners	Phone	In Favor
<b>Distribution/LSE Segment</b>			
Thomas Ringenbach	Manager Business Standards, American Electric Power Service Corporation	Phone	In Favor
Jack Leonard	Director, Transmission Management, Exelon PECO Energy	Phone	In Favor
Patrick W. Frazier	Vice President of Energy Operations, American Municipal Power Ohio Inc.	Absent	
Daniel E. Cooper	Engineering Manager, Michigan Public Power Agency	Absent	In Favor (notational)
Syd Berwager	Industry Restructuring Project Manager, Bonneville Power Administration/Power Business Line	Phone	
Jansen Pollock	Manager of Regulatory Affairs, Constellation NewEnergy	Absent	
<b>Generation Segment</b>			
Francis Halpin, alt. for B. Goss	Bonneville Power Administration	Phone	
Louis Oberski	Transmission Manager, Dominion Energy Marketing Inc.	In Person	In Favor
Tony Reed	Project Manager, Southern Company Generation and Energy Marketing	In Person	In Favor
Barry Green	Manager US Regulatory Affairs, Ontario Power Generation	Phone	
Tony Petrella alt. for	Ontario Power Generation	In Person	In Favor



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B. Green			
Steven B. Corneli	Director of Regulatory Affairs, NRG Power Marketing Inc.	Absent	
William J. Gallagher	General Manager of Vermont Public Power Supply Authority	Absent	In Favor (notational)

## Marketer/Broker Segment

Jim Ingraham	Tennessee Valley Authority	In Person	In Favor
Joel Dison	Project Manager, Southern Company Generation and Energy Marketing	In Person	In Favor
Clay A. Norris	Division Director, Planning, North Carolina Municipal Power Agency #1	In Person	In Favor
Charles Yeung	Director of Business Standards, Reliant Resources	In Person	In Favor
Alan Johnson	Senior Policy Analyst, Mirant	In Person	In Favor
Mark Tallman	Managing Director, Commercial & Trading, PacifiCorp	Absent	

## Transmission Segment

Steven C. Cobb	Manager Transmission Services, Salt River Project	In Person	In Favor
Jim Hicks, alt. for D. Gerrard	PacifiCorp	Phone	In Favor
Dean Ulch, alt. for J. Lucas	Principal Engineer, Southern Company Services, Inc.	In Person	In Favor
Mary Ellen Paravalos	Manager ITC Development, National Grid USA	Phone	In Favor
Dan Klempel	Director Transmission Regulatory Compliance, Basin Electric Power Cooperative	Absent	
Julie Voeck	Manager Strategic Policy and Planning, American Transmission Company	Phone	In Favor

**Total                      Motion Passes**

## Other Participation:

Name	Organization	In Person/Phone
Christopher Burden	Williams Gas Pipeline	Phone
Yvette Camp	Southern Company	Phone
Phil Cox	American Electric Power	Phone
Dale Davis	Williams Gas Pipeline	Phone
Ed Davis	Entergy	In Person
Michael Desselle	American Electric Power	In Person
Duane Farmer	Public Service Co. of New Mexico	In Person
Henry French	CenterPoint Energy	In Person
Jim Hartwell	NPCC	In Person
Bill Heinrich	NY PSC	Phone
Ruth Kiselewich	Baltimore Gas & Electric	In Person
Barry Lawson	NRECA	Phone
Steve McCoy	CAISO	In Person
Rae McQuade	NAESB Executive Director	In Person
Sherri Monteith	American Electric Power	In Person
Todd Oncken	NAESB Deputy Director	In Person
Barbara Rehman	Bonneville Power Admin	Phone



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Steve Terelmes  
Veronica Thomason  
Steve Zavodnick

Ameren  
NAESB Staff  
Baltimore Gas & Electric

In Person  
In Person  
In Person



# North American Energy Standards Board

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November 18, 2004

**TO:** NAESB Wholesale Electric Quadrant Executive Committee and Interested Industry Participants  
**FROM:** Todd Oncken, NAESB Deputy Director  
**RE:** WEQ Executive Committee Meeting Draft Minutes – November 16, 2004

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**NORTH AMERICAN ENERGY STANDARDS BOARD  
WHOLESALE ELECTRIC QUADRANT (WEQ) EXECUTIVE COMMITTEE MEETING  
Tuesday, November 16, 2004 – 10:00 am to 4:00 pm ET  
Hosted by American Gas Association – Washington, DC  
Draft Minutes**

**1. Welcome**

Mr. Oberski called the meeting to order and thanked Miriam Arnaout and the American Gas Association for hosting. Mr. Oncken gave the antitrust advice and called the roll of Executive Committee members. A quorum was established for the Executive Committee, but all motions requiring a super-majority will be distributed for notational vote to the End Users Segment since 40% of the Executive Committee members for that segment were not present.

**2. Wholesale Electric Quadrant Draft Agenda & Draft Minutes**

Modifications were made to the draft agenda to consider the recommended standards before the subcommittee reports, and include discussion of the October 21-22 WEQ Members Meeting where the sub-segment organization was discussed, recent action regarding the NERC Markets Committee, and the efforts of the NERC LTATF. Mr. Lucas moved, seconded by Mr. Green, to adopt the agenda as modified. The motion passed unanimously.

The draft minutes from the August 24, 2004 WEQ Executive Committee meeting were reviewed. A modification was made to the attendance list. Mr. Norris moved, seconded by Mr. Lucas, to adopt the August 24 minutes as modified. The motion passed unanimously.

**3. Recommended Standards – Discussion & Vote**

Mr. Dison, co-chair of the Electronic Scheduling Subcommittee (ESS), provided a general overview of the recommended standards being considered by the Executive Committee. Mr. Dison noted that the ESS drafted a letter to the Executive Committee, shown under tab 7 of the meeting materials, that provides context for each of the recommendations. Mr. Dison summarized that the recommendations reorganized the OASIS Baseline Standards, proposed new Standards of Conduct that were consistent with current FERC policy, and proposed several enhancements to OASIS Phase I.

OASIS Baseline Cleanup (R04005A): Mr. Dison stated Recommendation R04005A represents a straightforward clean up of the OASIS Baseline Standards ratified in April 2004. In addition to the clean up, he stated the Standards of Conduct, which was embedded in Recommendation R04005, was removed. Mr. Dison said the subcommittee reviewed the comments submitted on the recommendation and suggests they be addressed through a separate maintenance request since they relate to items such as definitions and nomenclature. Mr. Dison stated the disadvantage of considering the comments and making the changes during the Executive Committee meeting was the shortened time to deliberate and determine the ramification of the change in the context of the whole standard.



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Mr. Norris moved, seconded by Mr. Ingraham, to adopt as written Recommendation R04005A and direct the ESS/ITS to consider the comments received during the public comment period as a maintenance item for the next revision of this standard. The motion was supported unanimously by all Executive Committee members present. Subsequent to the meeting, notational votes were received in support of the recommendation by the End Users segment. The motion passed unanimously. [*Motion 1*]

OASIS 1A Enhancements – Standards of Conduct (R04006): Mr. Dison stated the public comments received on the recommendation indicated that it did not reflect the Standards of Conduct requirements contained in FERC Orders 2004, 2004A and 2004B. As such, he said the subcommittee corrected the recommendation as Recommendation R04006A (discussed below). Mr. Lucas moved, seconded by Mr. Klempel, to reject Recommendation R04006. After limited discussion a vote on the motion was taken. The motion was supported unanimously by all Executive Committee members present. Subsequent to the meeting, notational votes were received in support of the recommendation by the End Users segment. The motion passed unanimously. [*Motion 2*]

OASIS 1A Enhancements – Corrected Standards of Conduct (R04006A): Mr. Dison stated this recommendation replaces Recommendation R04006 and adequately reflects FERC Orders 2004, 2004A and 2004B. Mr. Dison stated the issues discussed in the other comments are still outstanding, but generally parallel the comments submitted on Recommendation R04005A. Mr. Dison suggested the comments that were primarily maintenance in nature could be addressed through a separate maintenance request as they relate to items such as definitions and nomenclature. A set of comments from Southern Company submitted by Mr. Lucas, were discussed and determined not to be of a maintenance nature, nor were they determined in discussion to be included in this recommendation, nor in the request to follow for maintenance items.

Mr. Gallagher moved, seconded by Mr. Green, to approve Recommendation R04006A as submitted by the subcommittee and provide the subcommittee the direction to take the comments submitted by WE Energies and HydroQuebec under consideration as maintenance but reject the comments submitted by Southern Company Services.

Mr. Lucas discussed his comments and reiterated concern that it is not appropriate for NAESB to adopt a standard that that is the exact duplicate of regulatory text. Ms. McQuade noted GISB used a different model for standards development where standards were developed based on NOPRs since there were no business practice standards in FERC regulations, but the WEQ is adopting the business practices developed by the ESC and OSC that are contained in FERC Orders 638, 888 and 889 as a baseline for future standards development. It was noted that would not be the perpetual standards development model used by the WEQ. Mr. Lawson stated NAESB standards should support regulatory requirements, not approve regulatory language that has already been approved by the FERC. Mr. Dison noted that the recommendation is not a 100% recitation of regulatory text, because it was tailored to the WEQ. Mr. Klempel stated the Executive Committee should be particularly aware of the comments submitted by Canadian members when adopting a standard that is 99% based on FERC language, because the Canadian organizations work under a different regulatory framework. Further, Mr. Klempel suggested it was more appropriate to consider the comments submitted by Canadian members in the standards adoption process rather than treating them as a maintenance item.

After extended discussion a vote was taken on the motion. The motion was not opposed by any Executive Committee members present. Subsequent to the meeting, notational votes were





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received in support of the recommendation by the End Users segment. The motion passed unanimously. [*Motion 3*]

OASIS Requirements for FERC Order 2003 - Large Generator Interconnection (R04011): Mr. Dison stated the subcommittees developed this standard as a result of a policy statement in FERC Order 2003. Mr. Dison explained the Order requires certain information to be posted on OASIS, but does not indicate where the posting should occur. Mr. Dison said the standard, in addition to providing a location to post the documents contemplated by FERC Order 2003, provides a default location for the posting of information required by future FERC Orders.

Mr. Norris moved, seconded by Mr. Ingraham, to adopt Recommendation R04011. The motion was supported unanimously by all Executive Committee members present. Subsequent to the meeting, notational votes were received in support of the recommendation by the End Users segment. The motion passed unanimously. [*Motion 4*]

OASIS 1A Enhancements – Multiple Requests (R04006B): Mr. Dison stated this recommendation addresses the issues of queue hoarding and submission of multiple requests on OASIS systems. He noted the subcommittees have not had the opportunity to review the comments submitted on the recommendation, but stated the comments appear to be either of a wordsmithing nature or comments that are duplicative of the comments made during subcommittee meetings.

The Executive Committee discussed how to move forward and the following motion was made by Mr. Cobb, seconded by Ms. Paravalos: defer the vote on Recommendation R04006B so the ESS/ITS could consider the comments and submit an additional report prior to the November 30 Executive Committee meeting. Ms. McQuade clarified that the motion would not result in an additional 30-day comment period. During discussion, Mr. Cobb noted this resolution would allow the Executive Committee to meet the publication deadline and utilize the expertise of ESS/ITS subcommittee participants. Mr. Dison did not support the motion for concern that it would defer the responsibility of the Executive Committee to review the comments to the subcommittee. A vote was taken on the motion and the motion passed by a simple majority. [*Motion 5*]

After consideration of Recommendation R04006C (below) the Executive Committee reconsidered its action on Recommendation R04006B. Mr. Williams moved, seconded by Mr. Gallagher, to resend the vote on Recommendation R04006B and replace it with the motion that passed for Recommendation R04006C. The motion was supported unanimously by all Executive Committee members present. Subsequent to the meeting, notational votes were received in support of the recommendation by the End Users segment. The motion passed unanimously. [*Motion 7*]

OASIS 1A Enhancements – Redirects (R04006C): Mr. Dison stated this recommendation addresses issues related to redirecting transmission flow to alternate paths. He noted the recommendation was similarly situated to Recommendation R04006B since the subcommittees have not had the opportunity to review the comments submitted on the recommendation. Mr. Dison stated he has reviewed the comments and most appear to be wordsmithing or comments that are duplicative of the comments made during subcommittee deliberations. Mr. Mitreski, a participant on the ESS/ITS, agreed that many of the comments paralleled comments made during the standards development process and the subcommittees had discussed the issues at length and reached compromises on them. He added that additional deliberation on the part of the subcommittee would not likely produce a different result. Mr. Dison clarified NAESB procedures do not require a subcommittee to process public comments received on a recommendation prior to the Executive Committee's consideration of the recommendation. Ms.



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McQuade added that it is not uncommon to see comments that are duplicative of the subcommittee's deliberations since the recommendation has gone through several rounds of comments within the subcommittee during the drafting process.

Mr. Dison moved, seconded by Mr. Norris, as follows:

Having reviewed the comments on the recommendation and finding none that would suggest the standard should not move forward, it is moved that the standard be adopted as recommended. Furthermore, given that the comments are primarily (a) issues that have already been discussed at length and disposed of in the subcommittee, (b) commenters preference of wording, and (c) suggested enhancements, it is moved that the EC direct the ESS and ITS to review the comments and, if appropriate, bring forth changes and/or enhancements as a maintenance item to this recommendation.

During discussion, it was noted that the other NAESB Executive Committees typically address the comments during the deliberation process rather than refer them back to the subcommittee to be processed as enhancements. Ms. McQuade clarified there were numerous different ways to process requests and comments on requests, each with its advantages and disadvantages. Mr. Reed noted the motion paralleled the action taken on Recommendation R04005A. Mr. Klempel suggested a fuller record of how comments on a draft standard were addressed by the drafting team, much like the process used by NERC, would provide the Executive Committee members assistance in processing the comments. It was noted that information on the deliberations of the drafting team and subcommittee are available on the NAESB website.

After extended discussion a vote was taken on the motion. The motion was supported unanimously by all Executive Committee members present. Subsequent to the meeting, notational votes were received in support of the recommendation by the End Users segment. The motion passed unanimously. [*Motion 6*]

#### **4. Subcommittee Updates and Plan Updates**

Triage Subcommittee: Mr. Oberski gave the Triage Subcommittee report. He stated Request R04032 was assigned to the WEQ at the November 8 Triage conference call. He noted there was some discussion during the conference call on whether the request was within NAESB scope since it asked for the development of regional standards. Mr. Cobb added that the WECC was working on a similar effort, so this was the first instance where NAESB and another organization would be working on standards for the same issue. Mr. Desselle encouraged the requestor to more fully develop the standards request to assist the JIC members in processing the request.

Mr. Oberski reviewed the NAESB Triage Subcommittee procedures and encouraged increased participation. He noted that there were only two WEQ Triage Subcommittee members present on the conference call, and seven WEQ Executive Committee members. He added that all issues related to the scope and assignment of standards requests would be handled and approved by the Executive Committee through that process.

Business Practices Subcommittee (BPS): Mr. Dison reported on the NAESB Version 0 standards drafting process and pending Energy Day request. Mr. Dison stated the five NAESB Version 0 recommendations – ACE, Coordinate Interchange, Inadvertent Interchange, Time Error Correction, TLR – have been approved by the subcommittee and posted for industry comment. Mr. Dison said the subcommittee was tasked with converting the business practice aspects of the current NERC Operating Policies. He noted many of the comments would probably relate to changes in the business practices, so those comments would be out of scope



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regardless of their merit. The WEQ Executive Committee will meet on November 30 to vote on the Version 0 recommendations.

As a follow up to the Version 0 work, Mr. Dison said it is anticipated that the BPS will address a modification to CIBP Version 1 so that it better reflects the Version 0 standard, identify the business practices and draft TLR Version 1, draft standards addressing ATC and CBM calculations that are currently contained in the NERC Version 0 standards, and consider modifications to the NAESB Version 0 standards that arose through the comment process. During discussion it was noted that Version 0 TLR would not be included in the upcoming WEQ report to the FERC, and also it was assumed that CIBP Version 1 would not be included in the filing. Additionally, it was noted that the ATC/CBM calculations were identified as business practice issues through the NERC comment process but NERC and NAESB agreed they would remain in NERC Version 0 due to the time constraints of Version 0. To manage the subcommittee's workload, Mr. Oberski suggested the BPS evaluate each of the Version 0 enhancements that are contained in the comments and categorize them by context as corrections to standards that do not correctly reflect business practices, changes that would improve the readability of the standards (wordsmithing), and other changes to the standards.

Mr. Oberski announced the first joint WEQ BPS and WGQ BPS meeting to work on the Energy Day request (Request R04016) was scheduled for December 1-2, 2004 in New York, NY. Mr. Oberski noted the draft agenda for the meeting was included in the meeting materials and encouraged Executive Committee members to participate. Review of the draft agenda initiated a discussion on the content and presenter of the WEQ presentation. Mr. Oberski stated the presentation would probably be similar to the presentations given by Andy Rodriguez or Alan Johnson during the GECTF meetings. Mr. Dison emphasized that the WEQ must be prepared going into the meeting since setting an Energy Day could have far-reaching impacts on the wholesale electric industry; for example, a day set from 09:00 a.m. to 09:00 a.m. CCT could mean that a peak period would have to be accounted for over several days. Mr. Williams added there are examples of reliability concerns that have developed because of the lack of coordination between the two industries. It was noted that the IRC might have a vested interest in the determination of an Energy Day. Mr. Hartwell commented that coordination and communication were the focus of discussions at a recent NPCC meeting where coordination of the industries was discussed, not a common Energy Day. Mr. Desselle stated that many parties view the determination of a common Energy Day as a prerequisite to work on the pending electric timelines and pipeline/generators communications requests. At the end of a lengthy discussion, it was decided that a representative from TVA would work with the NAESB Office to develop the WEQ presentation.

*Inadvertent Interchange Payback Task Force (IIPTF):* Mr. Reed gave the IIPTF report. He stated the group is working on two different standards – a financial payback model that would include a frequency bandwidth which would determine how the inadvertent interchange would be settled, and a modification of the WECC Automatic Time Error Correction procedure. He said the task force is preparing both versions for posting in hopes that the comments received can provide guidance to the group on how to proceed. Mr. Oberski added that drafts of the posting letter and two proposals are included under Tab 5 of the meeting materials. The next IIPTF meeting is scheduled for December 7-8 in Houston, TX at the NAESB Office.

Electronic Scheduling (ESS) and Information Technology (ITS) Subcommittees: Mr. Dison reported the ESS and ITS are working on the remaining items of Request R04006, noting that the subcommittees are actively working on Resales and have two other items outstanding. Additionally, Mr. Dison stated the subcommittees were developing standards requests to consider the comments submitted on the recommendations approved today (see discussion



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above) and a modification to the OASIS Standards & Communication Protocol (S&CP) to implement one of the R04006B (Redirects) standards.

*Coordinate Interchange Business Practices Task Force (CIBP):* No report was given.

*OASIS IA Task Force:* See ESS/ITS report above.

*OASIS II Task Force:* Mr. Dison reported the task force is meeting consistently and working diligently on the development of OASIS II.

Glossary Subcommittee: Mr. Reed gave the glossary subcommittee report. Ms. Rager provided a demonstration of the WEQ glossary application which will be hosted on the NAESB website. Mr. Reed projected that the application would be complete and would be available for NAESB member use before the end of 2004. During discussion it was noted that NAESB primary definitions within the same business function should be consistent, but there could be variations among business functions due to context. NAESB primary definitions are those terms that are defined in NAESB WEQ Standards. Mr. Reed stated that in those cases where the NAESB primary definitions differed, both would be listed as primary definitions and would reference the NAESB standards where they were adopted. Mr. Reed clarified that NAESB primary definitions would be debated and developed through the standards setting body, not the Glossary Subcommittee. Participants agreed the glossary would provide benefits to the industry and NAESB standards drafting teams because the drafting teams will now have the ability to consider multiple definitions while drafting standards. Mr. Hartwell suggested the NERC Version 0 definitions should be included in the glossary, once adopted by NERC later this year. Mr. Reed agreed and requested that industry participants submit any other sources that should be included in the Glossary and the Glossary Subcommittee would consider them through its inclusion process which was adopted at the last Glossary Subcommittee meeting.

Standards Review Subcommittee (SRS): The SRS has not met since the last Executive Committee meeting.

Seams Subcommittee: Mr. Cobb gave the Seams Subcommittee report. Mr. Cobb stated that Request R04020, Electric Transaction Scheduling and Timelines, and Request R04032, Energy Product Types – Western Interconnection, resulted from the Seams Subcommittee's prioritization of Seams Catalog issues. He stated a standards request for transmission market definitions and priorities is still under development. Additionally, he noted development of a standards request for conversion of point-to-point transmission service to flow-based transmission service was deferred due to general industry consensus.

*LTATF:* Mr. Green gave a report on the LTATF, a NERC task force with NAESB participation. Mr. Green stated the task force will report to the NERC Markets Committee in March with a number of recommendations for standards development. He added the task force worked on identifying areas where standards development was needed but did not discuss whether NERC or NAESB should develop the standards.

Proposed Changes to the 2004 Annual Plan: The NAESB Office will update the WEQ 2004 Annual Plan consistent with the recommendations approved by the Executive Committee and WEQ Subcommittee reports. After review it was determined that no modifications were required. The current WEQ 2004 Annual Plan is attached.

### **5. Drafting of 2005 Annual Plan**

The Executive Committee reviewed each of the items on the draft WEQ 2005 Annual Plan. New plan items were added to discuss the TSIN Registry, DUNs issues, and Request R04032. Language for the new items will be developed prior to the Executive Committee's consideration



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of the draft WEQ 2005 Annual Plan at the November 30 Executive Committee meeting. A redlined draft WEQ 2005 Annual Plan is attached, which includes the revised language added after the meeting.

### 6. Board Update, Board Committee Updates and Other Quadrant Meetings

Ms. McQuade stated the NAESB Board of Directors has established the following Board Committees as a result of concerns that were expressed during the June Board strategic session:

- **Resources Committee** – The Resources Committee, chaired by Ms. Ogenyi, is contacting companies to determine why they are not NAESB members or why they have not renewed their NAESB membership. While membership and resources issues clearly affect all quadrants, the committee is currently focused on the WEQ.
- **Retail Awareness Committee** – The Retail Awareness Committee (RAC), chaired by Mr. Burks, is focused on increasing awareness of the NAESB Retail work products among external audiences, including state regulatory agencies, trade associations with Retail industry members, and states that have not adopted retail competition. The committee is currently collecting success stories of how NAESB Retail standards have been used and developing a general presentation on the NAESB Retail standards.
- **Gas-Electric Interdependency Committee** – The Gas-Electric Interdependency Committee (GEIC), chaired by Mr. Templeton, is examining the interdependency between the industries at an executive level. One of the events the committee will review is the January 2004 New England cold snap.

Ms. McQuade stated that updates on all the committees will be given at the Board meetings and information is available on the NAESB website.

### 7. New Business

Update on Elections for 2005: Nominations for the open WEQ Board and Executive Committee seats closed on November 15. There was more than one nominee for the WEQ Executive Committee in the Transmission Segment/IOU Sub-segment, Distributors Segment/IOU Sub-segment, and Distributors Segment/Muni-Coop Sub-segment. NAESB WEQ members in good standing of the affected segment/sub-segment are eligible to return ballots by end of business November 30.

Procedures for Election of 2005 Executive Committee Officers: The election of 2005 Executive Committee officers will occur by notational ballot subsequent to the determination of the new WEQ Executive Committee members on November 30.

Update on meeting to discuss sunset provisions of WEQ segments: Mr. Desselle reviewed the results of the October 21-22 meeting. The consensus of participants in the meeting was that NAESB satisfies its bylaws by the legal opinion that service companies, ISOs, RTOs and RROs can self-select any segment/subsegment that most represents their interests and may choose to be considered for available Board and Executive Committee seats. Mr. Desselle noted that self-selections can be challenged as defined in the WEQ Procedures, and if overturned by two-thirds of the sub-segment membership, would be referred to the full Board of Directors for a final determination. Mr. Desselle added that several service companies and RROs have joined NAESB and are participating in the recent elections.



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Update on NERC Markets Committee: Mr. Oberski stated the NERC Markets Committee (MC) considered four proposals for reorganization at its most recent meeting. He stated the MC agreed to disband, but could not agree whether to or how to reorganize into a smaller working group. Mr. Brown stated the four motions considered at the meeting, along with the white paper prepared by the MC Executive Committee, would be forwarded for consideration by the NERC Board of Trustees. Mr. Brown noted the motions required a two-thirds majority. Mr. Oberski stated the MC reorganization would have obvious implications for NAESB, since the MC was the point of interaction for NAESB on standards issues. However, he noted NERC and NAESB have informally coordinating at NERC drafting team-NAESB subcommittee level. Mr. Lawson suggested that the focus should be on coordinating with the NERC Operating Committee and Planning Committee going forward.

### **8. Adjourn**

The meeting adjourned at 4:20 p.m. Eastern.



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## 9. Executive Committee Attendance and Voting Record

End User Segment		Attendance	1	2	3	4	5	6	7
John Hughes	Director Technical Affairs, Electricity Consumers Resource Council (ELCON)	Ballot	Y	Y	Y	Y		Y	Y
VACANCY	VACANCY								
Steve Sayuk	Manager Americas Supply, Power & Gas Services Group, ExxonMobil Power & Gas Services, Inc.	Absent							
Randy Corbin	Assistant Director Analytical Services, Ohio Consumers' Counsel	Absent							
Paul Jett	Manager of Electric System Operation Customer Choice Transition, Cinergy Services Inc.	Absent							
Bill Heinrich, alt. for L. Westerfield	New York State Department of Public Service	In Person	Y	Y	Y	Y	Y	Y	Y
Distribution/LSE Segment									
Thomas Ringenbach	Manager Business Standards, American Electric Power Service Corporation	Phone	Y	Y	Y	Y	Y	Y	Y
Jack Leonard	Director, Transmission Management, Exelon PECO Energy	Phone	Y	Y	Y	Y	Y		
Bob Williams, alt. for VACANCY	Director of Regulatory Affairs, Florida Municipal Power Association	In Person	Y	Y	Y	Y	Y	Y	Y
Daniel E. Cooper	Engineering Manager, Michigan Public Power Agency	Absent							
Syd Berwager	Industry Restructuring Project Manager, Bonneville Power Administration/Power Business Line	Absent							
Jansen Pollock	Manager of Regulatory Affairs, Constellation NewEnergy	In Person	Y	Y	Y	Y	Y	Y	Y
Generation Segment									
Bob Goss	Deputy Assistant Administrator of Power Resources, Southeastern Power Administration	Absent							
Louis Oberski	Director Electric Market Policy, Dominion Energy Marketing Inc.	In Person	Y	Y	Y	Y	Y	Y	Y
Tony Reed	Project Manager, Southern Company Generation and Energy Marketing	In Person	Y	Y	Y	Y	Y	Y	Y
Barry Green	Manager US Regulatory Affairs, Ontario Power Generation	In Person	Y	Y	Y	Y	Y	Y	Y
Woody Saylor	Director Finance & Engineering Midwest Power Region, Calpine	Ballot	Y	Y	Y	Y		Y	Y



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William J. Gallagher	General Manager, Vermont Public Power Supply Authority	In Person	Y	Y	Y	Y	Y	Y	Y	Y
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## Marketer/Broker Segment

Jim Ingraham	Tennessee Valley Authority	In Person	Y	Y	Y	Y	N	Y	Y
Joel Dison	Project Manager, Southern Company Generation and Energy Marketing	In Person	Y	Y	Y	Y	A	Y	Y
Clay A. Norris	Division Director, Planning, North Carolina Municipal Power Agency #1	In Person	Y	Y	Y	Y	N	Y	Y
Suzanne Calcagno	Associate Director – Regulatory Compliance, UBS Energy LLC	Absent							
Alan Johnson	Senior Policy Analyst, Mirant	Phone	Y	Y	Y	Y	Y	Y	Y
Mark Tallman	Managing Director – Commercial & Trading, PacifiCorp	Phone	Y	Y	Y	Y	Y	Y	Y

## Transmission Segment

Steven C. Cobb	Manager Transmission Services, Salt River Project	In Person	Y	Y	Y	Y	Y	Y	Y
Jim Hicks, alt. for D. Gerrard.	PacifiCorp	Phone	Y	Y	Y	Y	Y	Y	Y
John. Lucas	Manager – Transmission Services, Southern Company	In Person	Y	Y	A	Y	Y	Y	Y
Mary Ellen Paravalos	Director of Regulatory Policy, National Grid USA	Phone	Y	Y	Y	Y	Y	Y	Y
Dan Klempel	Director Transmission Regulatory Compliance, Basin Electric Power Cooperative	In Person	Y	Y	Y	Y	N	Y	Y
Julie Voeck	Manager Strategic Policy and Planning, American Transmission Company	Phone							

### Legend:

- 1=Motion to adopt Recommendation R04005A
- 2=Motion to reject Recommendation R04006
- 3=Motion to adopt Recommendation R04006A
- 4=Motion to adopt Recommendation R04011
- 5=Motion to defer action on Recommendation R04006B until November 30, 2004
- 6=Motion to adopt Recommendation R04006B
- 7=Motion to adopt Recommendation R04006C





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## 10. Other Participation

<b>Name</b>	<b>Organization</b>	<b>In Person/Phone</b>
Mariam Arnaout	American Gas Association	In Person
Christopher Burden	Williams Gas Pipeline	In Person
Valerie Crockett	Tennessee Valley Authority	In Person
Ed Davis	Entergy	Phone
Michael Desselle	American Electric Power	In Person
Andrew Dotterweich	Consumers Energy	Phone
Duane Farmer	Public Service Co. of New Mexico	In Person
Mark Fidrych	WAPA	In Person
Ollie Frazier	Duke Power	Phone
Tom Gwilliam	Iroquois Gas Transmission System	In Person
Laura Kennedy	NAESB	In Person
Barry Lawson	NRECA	In Person
Marcy McCain	Duke Energy Gas Transmission	In Person
Rae McQuade	NAESB Executive Director	In Person
Sherri Monteith	American Electric Power	In Person
Allen Mosher	American Public Power Association	In Person
Todd Oncken	NAESB	In Person
Lawrence Paulson	Hoffman-Paulson Associates	In Person
Marjorie Perlman	Energy East Management Corp.	Phone
Denise Rager	NAESB	In Person
Barbara Rehman	Bonneville Power Admin.	In Person
Marv Rosenberg	FERC	In Person
Veronica Thomason	NAESB	In Person
Kathy York	Tennessee Valley Authority	In Person
Steve Zavodnick	Baltimore Gas & Electric	Phone



# North American Energy Standards Board

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November 30, 2004

**TO:** NAESB Wholesale Electric Quadrant Executive Committee and Interested Industry Participants  
**FROM:** Rae McQuade, Executive Director  
**RE:** WEQ Executive Committee Meeting Draft Minutes – November 30 2004

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**NORTH AMERICAN ENERGY STANDARDS BOARD  
WHOLESALE ELECTRIC QUADRANT (WEQ) EXECUTIVE COMMITTEE MEETING  
Tuesday, November 30, 2004 – 1:00 pm to 5:00 pm ET  
Hosted by KeySpan Energy – New York City, New York  
Revised Draft Minutes**

## 1. Welcome and Administrative Items

Mr. Oberski called the meeting to order and thanked KeySpan for hosting the meeting. Ms. Kennedy read the roll to establish quorum. The agenda was adopted by consensus. Ms. Kennedy read the antitrust charge. Each attendee introduced himself.

## 2. Review and Vote on Version 0 Standards

The meeting will be conducted by reviewing each of the comments submitted along with the Business Practices Subcommittee (BPS) recommendation regarding the comments in priority order. A work paper was posted prior to the meeting, directly following the November 29 BPS conference call and will serve as a basis for the discussion. Four priorities were defined, and can be paraphrased as:

1. Correction of errors
2. Executive Committee discussion and resolution, and could be considered substantive changes.
3. Possible improvements in language or other clarifying changes but does not substantively change the standard
4. Other comments

**PRIORITY 1:** For priority 1 issues –errors that require correction, each was discussed as proposed by the BPS after review of the comments. All changes recommended by the BPS for correction and categorized as a priority 1 were made, and can be viewed in the attached redline edits to each of the five standards. There was no opposition to the corrections. In cross-reference to the work paper, the corrections included:

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Item	Page	Notes
Item II D	Page 30	Similarly addresses repeat priority 1 items in II,A and II,F Note: II,D also contains priority 2 and 4 comments as well.
Item II F	Page 36	Also contains priority 3 and 4 comments)
Item IV E	Page 56	Will also address priority 1 items in V A and IV G.

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Item	Page	Notes
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Note: IV,E also contains priority 3, and 4 comments

Note: IV,E priority 1 item is a definition issue

Item V B      Page 65

**PRIORITY 2:** For priority 2 issues – comments that require discussion and EC decisions, the first area discussed was definitions. The BPS reviewed and recommended replacement definitions to defer in most cases with the NERC glossary. The differences were specifically noted. There were some comments that NAESB should not include definitions in its standards at all, or only include them when NERC does not address the specific definition. Options were discussed to simply adopt the NERC glossary or to defer to the NERC definitions with terminology “as defined in the NERC glossary.” Most concerns relate to definitions in the TLR standards, and as NAESB is not filing TLR Version 0 with FERC because it is duplicative between the two organizations (NERC/NAESB), these issues can be delayed to be addressed in Version 1 development. Similarly, it was noted that there may be differences between NERC and NAESB definitions with the Coordinate Interchange Version 0 standards. As future efforts proceed, it may be advantageous to have a joint NERC-NAESB glossary team, which could be discussed later possibly for the annual plan. Ten definitions differ from NERC definitions. Each was reviewed separately.

1. Contract path (used in TLR) is different. All participants supported the NAESB definition as noted in the BPS recommendation, with the modification to add the word “necessarily”.
2. Point-to-Point Transmission Service (used in TLR) – There was consensus to maintain the NAESB definition as it is consistent with tariff language.
3. Purchasing Selling Entity (PSE) (used in TLR) – There was consensus to modify the NAESB definition to match the NERC definition.
4. Sink Balancing Authority (used in TLR) – The second portion of the NERC definition does not apply to any NAESB standards and includes capitalized terms that are not present in NAESB standards, and as such the BPS did not recommend its adoption. After further discussion it was determined to adopt the NERC definition in its entirety with modifications to lower case those terms that are not NAESB definitions.
5. Transmission Customer (used in TLR) – BPS recommended that NAESB adopt the OASIS definition. NERC recognizes two definitions, one of which is the OASIS definition. This is the definition that was present in the materials and was adopted without change.
6. Transmission Service Provider (TSP) or Transmission Provider (TP) (used in TLR) – the BPS recommended definition matches the NERC glossary but does not agree with the OASIS definition and the OASIS open tariff. There is a plan in place to correct the OASIS definition by NAESB. It was determined to support the BPS recommendation.
7. Transmission Service Provider (TSP) or Transmission Provider (TP) (used in Inadvertent Interchange) -- the BPS recommended definition matches the NERC glossary but does not agree with the OASIS definition and the OASIS open tariff. There is a plan in place to correct the OASIS definition by NAESB. It was determined to support the BPS recommendation.



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8. Load Serving Entity (LSE) (used in Coordinate Interchange) – the EC determined to modify the BPS recommendation and adopt the NERC definition – “secures energy and transmission service (and related interconnected operations services) to serve the electrical demand and energy requirements of its end-use customers.”
9. Source BA (used in Coordinate Interchange) – for reasons stated above, it was determined to use the NERC definition rather than the NAESB definition recommended by BPS.
10. Transmission Service Provider (TSP) or Transmission Provider (TP) (used in Coordinate Interchange) -- the BPS recommended definition matches the NERC glossary but does not agree with the OASIS definition and the OASIS open tariff. There is a plan in place to correct the OASIS definition by NAESB. It was determined to support the BPS recommendation.

As an overall change to definitions, interconnected operations services was not capitalized, nor were terms that were not used in the NAESB standards but referred to as defined and thus capitalized terms in the NERC standards. The Executive committee recognized the importance of staying consistent with NERC definitions and determined to further work with NERC on version 1, possibly in a joint glossary effort.

**PRIORITY 2:** The second major topic of priority two items are those of regional differences. Each regional difference was reviewed separately. It was determined not to make changes to the standards to specifically outline regional differences. This determination was reached unanimously after considerable discussion on each comment regarding such differences. After NAESB forwards the business practice standards to FERC, if FERC determines to make them mandatory, regional differences can be accommodated through the request for waivers, or the standards can be modified at a later date to reflect such. In the case of Inadvertent Interchange Payback, section 1.2 specifically notes that if all regions within an interconnection agree, another method for payback can be employed. Changes that were made to the applicability section to apply to all balancing authorities with references to NERC regions removed, and the title was changed to Inadvertent Interchange Payback.

Similarly, for the Time Error Correction Standard, the current NERC policy of a manual time error correction initiated at 2 seconds in item 5 was not changed to reflect regional differences. As the standards are adopted and if the FERC determines that the standards should be mandatory, as noted earlier, waivers can be requested for regional differences.

To cross reference back to the work paper, the comments discussed for change as priority 2 issues included:

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Item	Page	Notes
Item B	Page 6	Definitions
Item II D	Page 30	
Item III A	Page 39	will also address repeat priority 2 items in III,C
Item IV B	Page 51	will also address repeat priority 2 items in IV,D Note: Also contains Priority 3 and 4 comments

**PRIORITY 3:** Priority 3 items reflect improvements in language but are not critical to version 0 adoption. Each comment was reviewed separately and the changes accepted by the Executive committee are shown as redlines to the business practice standards.



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For the ACE Special Cases, comments were received that NAESB need not define this standard at all, and should be fully addressed within the NERC ACE standard. It should be noted that from a NAESB perspective, only the business practices of the ACE special cases are defined in the NAESB standard – and the Joint Interface Committee, NERC and NAESB determined that NAESB would develop these business practices. As such, no changes were made based on these comments. Similarly for the additional clarification that ACE equation needs to be entered as equal and opposite values by both parties (Balancing Authorities source and sink) it was determined that the clarification should be addressed in version 1 development and no change will be made in version 0.

For the Coordinate Interchange standards, several capitalization corrections were made. In the Time Error Correction standards, item 7 was changed to reflect the language “Each Balancing authority when requested shall participate in a Time Error Correction by one of the following methods.” Also for the Time Error Correction standards, the comment that requested a modification to list exemptions was determined more appropriate for version 1. Additionally for the Time Error Correction standards, in Section 11 was changes were made to refer to the Interconnection Time Monitor.

To cross reference back to the work paper, the comments discussed for change as priority 3 issues included:

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<b>Item</b>	<b>Page</b>	<b>Notes</b>
Item I E	Page 22	Also contains priority 4 comments
Item II E	Page 34	Also contains priority 4 comments
Item III A	Page 35	Also contains priority 4 comments
Item IV B	Page 39	will also address repeat priority 2 items in III,E Also contains priority 4 comments
Item IV B	Page 51	Also contains priority 4 comments
Item IV E	Page 57	Also contains priority 4 comments
Item IV F	Page 59	Also contains priority 4 comments

**PRIORITY 4:** All other comments were considered priority 4 items. No actions were taken that resulting in changing the standards on the priority 4 items but each comment was reviewed separately.

As a separate item, it was determined that the manual redispatch references (MRD) contains in in both NERC and NAESB version 0 standards, should be so noted in the NAESB submittal letter to the FERC. NERC and NAESB jointly provided a report to the FERC noting that it is not the intention of either organization to support MRD as it currently exists, and we recommended that a technical conference should be held to determine if further actions are needed.

Mr. Lucas made the motion seconded by Mr. Reed to adopt the five sets of business practices (Transmission Load Relief, Inadvertent Interchange Payback, ACE equation Special Cases, Coordinate Interchange, and Time Error Correction) as NAESB business practices with the modifications as adopted in the meeting today. The vote was unanimous in favor. Ballots received after the meeting reached the super-majority threshold of 67% on the EC members



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voting in favor and a minimum of 40% of each segment voting in favor. No votes in opposition were cast.

### 3. Review and Vote on 2005 Draft WEQ Annual Plan

It was determined to review and adopt the 2005 WEQ Annual Plan with changes as noted in the November 16 EC meeting by notational ballot via email.

### 4. Adjourn

Mr. Dison made the motion to adjourn seconded by Mr. Reed. There was no opposition. The meeting adjourned at 5:00 pm.

### 5. Executive Committee Attendance and Voting Record

Member		Attendance	Vote on Version 0 Motion
<b>End User Segment</b>			
John Hughes	Director Technical Affairs, Electricity Consumers Resource Council (ELCON)	Phone	Y
V A C A N C Y	V A C A N C Y		
Steve Sayuk	Manager Americas Supply, Power & Gas Services Group, ExxonMobil Power & Gas Services, Inc.	Ballot	Y
Randy Corbin	Assistant Director Analytical Services, Ohio Consumers' Counsel	Ballot	Y
Paul Jett	Manager of Electric System Operation Customer Choice Transition, Cinergy Services Inc.	Absent	
L. Westerfield	Idaho Public Utility Commission	Absent	
<b>Distribution/LSE Segment</b>			
Thomas Ringenbach	Manager Business Standards, American Electric Power Service Corporation	Phone	Y
Jack Leonard	Director, Transmission Management, Exelon PECO Energy	Absent	
VACANCY			
Bob Schwermann as alternate for Daniel E. Cooper	Sacramento Municipal Utility District	In Person	Y
Syd Berwager	Industry Restructuring Project Manager, Bonneville Power Administration/Power Business Line	Phone	Y
Jansen Pollock	Manager of Regulatory Affairs, Constellation NewEnergy	Phone	Y
<b>Generation Segment</b>			
Bob Goss	Deputy Assistant Administrator of Power Resources, Southeastern Power Administration	Ballot	Y
Louis Oberski	Director Electric Market Policy, Dominion Energy Marketing Inc.	In Person	Y
Tony Reed	Project Manager, Southern Company Generation and Energy Marketing	In Person	Y



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<b>Member</b>		<b>Attendance</b>	<b>Vote on Version 0 Motion</b>
Barry Green	Manager US Regulatory Affairs, Ontario Power Generation	Phone	Y
Woody Saylor	Director Finance & Engineering Midwest Power Region, Calpine	Ballot	Y
Scott Course as alternate for Bill Gallagher	Vermont Public Power Supply Authority	In Person	Y
<b>Marketer/Broker Segment</b>			
Jim Ingraham	Tennessee Valley Authority	Ballot	Y
Joel Dison	Project Manager, Southern Company	Phone	Y
Clay A. Norris	Division Director, Planning, North Carolina Municipal Power Agency #1	Phone	Y
Suzanne Calcagno	Associate Director – Regulatory Compliance, UBS Energy LLC	Absent	
Alan Johnson	Senior Policy Analyst, Mirant	Phone	Y
Phil Cox as an alternate for Mark Tallman	American Electric Power	In Person	Y
<b>Transmission Segment</b>			
Steven C. Cobb	Manager Transmission Services, Salt River Project	Phone	Y
Jim Hicks, alt. for D. Gerrard.	PacifiCorp	Ballot	Y
John. Lucas	Manager – Transmission Services, Southern Company	In Person	Y
Mary Ellen Paravalos	Director of Regulatory Policy, National Grid USA	In Person	Y
Dan Klempel	Director Transmission Regulatory Compliance, Basin Electric Power Cooperative	Absent	
Julie Voeck	Manager Strategic Policy and Planning, American Transmission Company	Absent	
<b>MOTION CARRIES</b>			
Total Votes Cast			22
Percentage of 28 Members			79%
A minimum of 40% affirmative votes of the seated members of each segment was achieved.			

## 10. Other Participation

<b>Name</b>	<b>Organization</b>	<b>In Person/Phone</b>
Scott Brown	Exelon	Phone
Ed Davis	Entergy	Phone
Lynnda Ell	Entergy	Phone
Laura Kennedy	NAESB	In Person
DeDe Kirby	NAESB	Phone
Barry Lawson	NRECA	Phone



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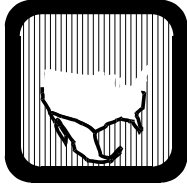
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<b>Name</b>	<b>Organization</b>	<b>In Person/Phone</b>
Bill Lohrman	NERC	In Person
Rae McQuade	NAESB Executive Director	In Person
John Reese	New York Public Service Commission	In Person
Barbara Rehman	Bonneville Power Authority	Phone
Narinder Saini	Entergy	Phone
Veronica Thomason	NAESB	In Person
Charles Yeung	Southwest Power Pool	In Person





# NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL

Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

## NERC-NAESB-ISO/RTO Council Joint Interface Committee Meeting

February 18, 2004 — 1:00 p.m.–5:00 p.m.

February 19, 2004 — 8:00 a.m.–4:00 p.m.

Wyndham New Orleans at Canal Place  
100 Rue Iberville  
New Orleans, LA 70130

### Meeting Minutes

#### Attendance

##### *NAESB Representatives*

Michael Desselle (Co-chair)  
John Hughes (alt)  
Syd Berwager  
Lou Oberski  
Charles Yeung (phone)  
Ed Davis (alt)  
Andy Dotterweich (alt)  
Alan Johnson (alt)  
Jim Templeton (alt)  
Mary Ellen Paravalos  
Tony Reed (alt)

##### *NERC Representatives*

Linda Campbell (Co-chair)  
Mark Fidrych  
Scott Henry  
Sam Jones  
Ed Schwerdt  
Ed Tymofichuk

##### *IRC Representatives*

Karl Tammar (Co-chair)  
Rich Wodyka (phone) – PJM

Kent Saathoff (phone)

##### *Other*

Tim Gallagher — Secretary

##### *Guests*

Steve Cobb — SRP  
Veronica Thomason — NAESB  
Bradley Kranz — NYISO  
Barbara Rehman — BPA  
Bill Boswell — NAESB  
Bruce Balmat (phone) — PJM  
Don Benjamin — NERC  
Rae McQuade — NAESB  
Todd Oncken — NAESB  
Marv Rosenberg — FERC  
Terry Bilke (phone) — MISO  
Marcel Harvey — TransEnergie  
Ken Brown (phone) — PSE&G  
Steve McCoy (phone) — CAISO  
Sandy Murrey (phone) — WE Energies

1. All present and those attending via teleconference were introduced. Transcripts of JIC meetings will be kept and a transcriber attended this meeting.
2. The agenda was unanimously approved. Todd Oncken reviewed the anti-trust guidelines. A quorum was established for NAESB, NERC, and ISO/RTO Council (IRC) members.
3. Michael Desselle presented an overview of the memorandum of understanding (MOU) between NAESB, NERC, and the IRC. The agreement creates a forum for coordination of annual planning and also establishes a mechanism for the review of proposals for standards and their subsequent assignment to either NAESB or NERC for development.
4. Michael Desselle reviewed the role of the JIC and its voting procedures. Each contingent of the JIC receives an equal share of the vote, divided by the number of representatives present. Since a quorum was established for all three JIC contingents at this meeting, each received one-third of the vote.
5. Lou Oberski presented three proposals for business practice standards received by NAESB.
  - Adopt already existing FERC OASIS business practice standards as NAESB standards. Doing so will provide NAESB with a starting point to initiate any changes requested by the industry via their standards development process (r04005).
  - Acceptance of the NAESB IT subcommittee's recommended actions on the OASIS IA issues left over from the OASIS scheduling collaborative (r04006).
  - Review existing OASIS standards and FERC Commission proceedings to develop a body of business practice standards for consideration as part of OASIS phase 2 (r04007).

**Motion (Lou Oberski, Andy Dotterweich second):** Assign development of the three business practice standards proposals (requests r04005, r04006, r04007) to the NAESB process.

**Discussion:**

Terry Bilke stated that the timing table included in r04005 for long term firm does not appear consistent with some Midwest ISO (MISO) transmission providers who need to perform impact studies. If this standard will become a mandatory requirement, the MISO would like more than 30 days to review the standard.

Alan Johnson stated that his NAESB subcommittee is aware of this concern and has assignment to follow up with MISO and Terry Bilke. [\[Action Item\]](#)

Marv Rosenberg questioned if the proposal was different than the current FERC requirements and was answered that no changes were intentionally made.

Mark Fidrych requested that NAESB develop a more user-friendly way of designating the requests, as the numbering system does not convey the intent of the standard. Lou Oberski will bring this up at future NAESB meetings.

**Vote:**

IRC — Unanimous approval of Mr. Oberski's motion  
NAESB — Unanimous approval of Mr. Oberski's motion  
NERC — Unanimous approval of Mr. Oberski's motion

**Motion carries**

6. Discussion of annual plans:

Lou Oberski presented an overview of the 2004 NAESB annual plan and the process used to develop and approve it. Linda Campbell asked for more information regarding the effort to coordinate the NAESB and NERC gas/electricity interdependency groups. Mr. Oberski agreed that such coordination is important and believes that the proper outreach will occur. There is a common NERC-NAESB task force member who can be enlisted as a liaison between the two groups.

Tim Gallagher presented an overview of the 2004 NERC annual plan and the process used to develop and approve it. Questions were raised about the implementation of the functional model and if the model was still a work in progress. Mr. Gallagher and Don Benjamin answered that the model will continue to be in a state of flux for the near future. A plan for certification of entities in the functional model and to transition to the model via the retirement of existing NERC requirements and their replacement by reliability standards is being developed. NAESB is represented on the team developing the transition plan.

Linda Campbell asked the group to focus not just on coordination of standards development, but also the coordination of their implementation. Michael Desselle stated that Linda's observation is an excellent one and is one that NERC, NAESB, and the IRC must work together to accomplish.

Karl Tammar presented an overview of the 2004 IRC annual plan and the process used to develop and approve it. The IRC pledges to work together with NERC and NAESB and builds upon activities included in their respective annual plans.

Scott Henry asked if any advancements made associated with reliability-related IT communications would be made available to non-RTO transmission providers. Further, will such communications improvements be submitted to NERC as standards?

Karl Tammar answered yes, in both cases. The IRC does not envision development of proprietary reliability related systems or data exchanges.

Michael Desselle asked if IRC/EPRI are coordinating CIMs (common information model) development with NERC? Mr. Desselle reminded the NAESB JIC representatives to follow this effort and any extensions to include market data.

Mark Fidrych stated that the same IRC representatives working on CIMS development are also involved in NERC's CIMs involvement. Because CIMs may be higher priority to IRC than NERC, Mr. Fidrych will propose that the NERC Operating Committee focus some attention upon the CIMs effort at its next meeting. Mr. Fidrych and Mr. Tammar will coordinate NERC and IRC efforts on CIMs development. [\[Action Item\]](#)

7. Steve Cobb presented an overview of a list of seams issues between RTOs and ISOs ("seams catalogue") developed by the NAESB Seams Subcommittee. Mr. Cobb explained that the goal of this effort was to identify seams issues across North America and who should work to resolve them. It is recognized that the catalogue does not contain all seams issues and that more may be added in the future. Later, any interested party can propose standards and the JIC can review and assign them to the appropriate organization for development.

Mr. Cobb stated that NAESB, NERC, and the IRC agreed which organization should be designated for the development of solutions to identified seams issues in the majority of cases.

**Discussion:**

Terry Bilke stated that the MISO was concerned about the potential for circumventing the development processes of NERC and NAESB via assignment made in the seams catalogue. Michael Desselle and Steve Cobb answered that it is not the intent of the catalogue or the seams subcommittee for any circumvention to occur. The catalogue and any assignment made in it do not preclude anyone from submitting a request for a standard to NAESB or NERC.

Karl Tammar stated that the IRC requests that four specific issues be put on hold, listed as regional, and that their development be assigned to the IRC:

1. Congestion management, (issues 35–36) LMPs at borders, and coordination of FTRs and other hedging mechanisms. These issues have policy, market design, and regional components.
2. Compensation for reactive power (16)
3. Issue 46, generator interconnection requirements, should not be an issue considered for standardization based upon prior agreement and FERC discussions.
4. Description of green power (113) needs clarification. If the intent of this issue pertains to market design, this should be a regional issue, assigned to IRC.

The JIC began a discussion of the items listed by Mr. Tammar and quickly came to the realization that the JIC cannot agree which organization should be designated as the developer for the referenced standards. The JIC agreed that similar discussion of other seams issue for which an agreed upon designated organization does not exist will not bear fruit either. Further, the JIC agreed that the designation in the seams catalogue carries no weight, other than to provide someone interested in proposing a given standard with an indication of which organization (NAESB, NERC or the IRC) should be approached.

**Motion: Mark Fidrych, Tony Reed second, friendly amendment by Scott Henry:** Accept those issues for which there is agreement for assignment of development of a standard proposal to the designated organization.

**Vote:**

IRC — Unanimous approval of Mr. Fidrych’s motion  
NAESB — Unanimous approval of Mr. Fidrych’s motion  
NERC — Unanimous approval of Mr. Fidrych’s motion

**Motion carries**

**Motion: Lou Oberski, Mark Fidrych:** Accept the remaining seams issues and label the designated organization column as undecided.

**Vote:**

IRC — Unanimous approval of Mr. Oberski’s motion  
NAESB — Unanimous approval of Mr. Oberski’s motion  
NERC — Unanimous approval of Mr. Oberski’s motion

**Motion carries**

Mike Desselle stated, and the JIC agreed, that no further action would be taken on any of the seams issues, until an interested party develops a request for an associated standard.

Ed Tymofichuk asked if the present seams catalogue adequately captures all the seams issues and what process will be used to incorporate seams issues identified in the future. Lou Oberski stated that NAESB could open collection of seams issues again and gather more, following a similar process used to solicit and collect the issues in the current catalogue. Perhaps a review of the most current catalogue could be placed on the JIC agenda on a routine basis.

8. The next two JIC meetings will be held as conference calls on May 18, 2004 at 2–3 p.m. central and July 13, 2004 from 2–3 p.m. central.

The next face-to-face JIC meeting will be held on September 21, 2004 at a location to be determined. The purpose of the meeting will be to discuss draft annual plans for 2005.

## **Seams Catalog Column Headings:**

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- A Original Number** - The number originally assigned the seam issue. Used to track each issue as it was categorized and re-categorized.
- B Category** - Seam issues are grouped into one of 8 categories:
1. Congestion Management
  2. Market Design
  3. Market Monitoring / Compliance
  4. Market Standards
  5. Planning
  6. System Reliability
  7. Transaction Scheduling
  8. Transmission Service
- C 1st Sub-Category** - The seam issues categories are further delineated into 1st sub-categories.
- D 2nd Sub-Category** - The seam issue 1st sub-categories are even further delineated into 2nd sub-categories.
- E Description Of Seam Issue** - Brief description of the seams issue.
- F Comments** - Additional comments providing background or further definition of the seam issue.
- \* **Association / Notes** - Identification of associated seam issues based on their Original Number. (Ed. Note: this column was eliminated once seams issues were categorized).
- \* **Seam Interface Type** - Each seam interface has 2 acting parties. Here the market status relationship between the 2 acting parties are identified, e.g., RTO Market to RTO Market, RTO Market to Non-RTO Market, Non-RTO Market to Non-RTO Market. (Ed. Note: this column was eliminated once seams issues were categorized).
- G Resp Org Cobb** - Recommended assignment by Steven Cobb, Salt River Project.
- H Resp Org IRC** - Recommended assignment by Karl Tammar, NYISO, as representative of the IRC.
- I Resp Org Mueller** - Recommended assignment by Ken Brown and Jeff Mueller, PSEG.
- J Resp Org WEQ EC** - Recommended assignment by WEQ EC for JIC meeting held on Feb. 18-19, 2004.
- K NERC Choice** - Recommended assignment by NERC for JIC meeting held on Feb. 18-19, 2004. Not part of the WEQ Seams Subcommittee's work product. Included for informational purposes only.
- L Issue Type** - Categorization of seams issue as either "national" or "regional" in scope.
- M Responsible Organization JIC** - The recommended organization as assigned by the NERC / NAESB / IRC Joint Interface Committee (JIC) at meeting held on Feb. 18-19, 2004.
- L Region 1** - The RTO, ISO, or Non-RTO Market Region that is the 1st acting party to the seam issue is identified here.
- M Region 2** - The RTO, ISO, or Non-RTO Market Region that is the 2nd acting party to the seam issue is identified here.

### **Seams Catalog Column Headings:**

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- N Priority** - The organization assigned a seam by the NERC / NAESB / IRC Joint Interface Committee (JIC) will use this column to prioritize their efforts.
- O Seam Impediment Type** - Identification of what causes the seam issue, e.g., market rule, business practice, physical barrier.
- R Currently Being Addressed** - Identification of another body that is currently working on the seam issue.
- S Submitter** - The name of the person and organization providing the matrix information.
- T Reference Papers** - If reference papers are provided to support the information, a letter is assigned to the document. The index of reference papers appears at the end of the matrix.
- U NAESB Support** - Comments of WEQ EC in support of their recommendations contained in column J. Not part of the actual catalog adopted by the EC or JIC. Included for informational purposes only.

**Seams Issues Matrix**  
(As Adopted at JIC Meeting, Feb. 18-19, 2004)

Orig #	Category	1ST Sub-Category	2ND Sub-Category	Description of Seam Issue	Comments	Issue Type	Resp Org JIC	Currently Being Addressed
36	Congestion Management	Congestion Management Market Coordination	Coordinate Hedging Instruments at Market Interfaces	Coordination of market based congestion hedging instruments, such as FTRs, between adjacent RTOs with markets, especially for out and thru' transactions		National	Undecided	
132	Congestion Management	Congestion Management Market Coordination	Joint Re-Dispatch Agreements	Interaction with American Transmission Company; possible joint redispatch agreement among ATC-PJM-Generators on ATC's system		Regional	PJM/MISO	In PJM/MISO Congestion Management Proposal Whitepaper
115	Congestion Management	Congestion Management Market Coordination	Standardize Congestion Management Market Data Exchange	Congestion Management Procedures including reciprocal coordination agreement, exchange of data for real-time and projected operations, SCADA, EMS, Operations Planning and Planning information and models; better granularity, avoid double counting, use of state estimator and LMP to enable RTOs to accurately and consistently quantify flows/impacts outside of NERC IDC to enable RTO to RTO and market to market congestion management to achieve greater efficiencies without calling TLRs; MISO and PJM and expansions to use same methods.	Definition of AFC coordination process between RTOs.	Regional	Undecided	In PJM/MISO Congestion Management Proposal Whitepaper
35	Congestion Management	Congestion Management Market Coordination	Standardize Prices at Market Interfaces	Locational Marginal Prices (LMP) at borders of RTOs with markets (Price cap included)		National	Undecided	
68	Congestion Management	Congestion Management Market Coordination	Standardize Prices at Market Interfaces	Market Design - Prior to Day Ahead. Secondary Market	To the extent that at a minimum congestion redispatch occurs in an RTO (i.e. a limited energy market), can a method be developed to produce consistent prices at the boundaries? If not, can price discontinuities be tolerated or managed? (Issue I.b.1)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
70	Congestion Management	Congestion Management Market Coordination	Standardize Prices at Market Interfaces	Market Design - Day Ahead. Congestion Management Market	If models with identical levels of detail for the West are not used by all three RTOs, do the various simplifications for areas outside any given RTO create problems in achieving a uniform set of redispatch prices? (Issue I.b.3)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
72	Congestion Management	Congestion Management Market Coordination	Standardize Prices at Market Interfaces	Market Design - Day Ahead. Model spatial granularity	To the extent that at a minimum congestion redispatch occurs in an RTO (i.e. a limited energy market), can a method be developed to produce consistent day ahead prices at the boundaries? (Issue I.b.5)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
80	Congestion Management	Congestion Management Market Coordination	Standardize Prices at Market Interfaces	Market Design - Day Ahead. Other Scheduling Requirements	To the extent that at a minimum congestion redispatch occurs in an RTO (i.e. a limited energy market), can a method be developed to produce consistent prices at the boundaries that send the same signal to the market? If not, can price discontinuities be tolerated or managed? (Issue I.b.13)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group



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92	Congestion Management	Congestion Management Market Coordination	Standardize Prices at Market Interfaces	Market Design - Real Time. Model objective function	How much would a common dispatch interval mitigate against price discontinuities at boundaries? (Issue I.d.2)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
62	Congestion Management	Congestion Management Market Coordination		Market Design - Prior to Day Ahead. Financial or Physical	Must the offerings be identical? How can congestion management discontinuities be mitigated? (Issue I.a.3)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
63	Congestion Management	Congestion Management Market Coordination		Market Design - Prior to Day Ahead. Option or Obligation	Do different CM models create barriers to trade, and if so, how can these differences be mitigated? (Issue I.a.4)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
64	Congestion Management	Congestion Management Market Coordination		Market Design - Prior to Day Ahead. Revenue Stream/ or Offset CM Cost	Must the term of congestion offerings be identical? How can congestion management discontinuities be mitigated? (Issue I.a.5)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
129	Congestion Management	Congestion Management Market Coordination		Selection process for market/TLR coordinated flowgates; inclusion of flowgates in PJM FTR/ARR auctions; flowgates with and without effective control by markets; updates to flowgate list, phase-in; dispute resolution; let RTO calculate flows outside of IDC and TLR; audit rights; confidentiality of data; consideration of flowgates outside PJM and MISO	Standardized rules for determining flowgates impacted by an RTO.	Regional	Undecided	In PJM/MISO Congestion Management Proposal Whitepaper
138	Congestion Management	Congestion Management Market Coordination		Coordination of congestion	Several regional efforts are underway. Coordinate practices and methods between areas with different market approaches.	National	NAESB	Yes
125	Congestion Management	Determining Control Area Boundaries		Retention of former CAs in the model	When expanding Control Area boundaries (i.e., merging Control Areas) is it necessary to retain "Historic" boundaries for use in NNL estimation or other reasons?	Regional	PJM/MISO	In PJM/MISO Congestion Management Proposal Whitepaper
73	Congestion Management	Operate Markets Within Transmission Limits		Market Design - Day Ahead. Model objective function	Who coordinates the scheduling constraints (i.e., security constrained dispatch) on paths that cross RTO boundaries to ensure that inter-RTO schedules do not exceed reliability standards? (Issue I.b.6)	Regional	Undecided	SSG-WI, CMA Work Group
130	Congestion Management	Operate Markets Within Transmission Limits		What happens when MISO and PJM and outside PJM/MISO firm and CBM exceed TTC - day ahead mechanism to reduce oversubscribed conditions		Regional	PJM/MISO	In PJM/MISO Congestion Management Proposal Whitepaper
43	Congestion Management	Standardize and Coordinate ATC Calculations	Contract Tie Capacity Sharing	Allow Sharing Contract Tie Capacity between Entities across Seams	Lack of Coordination and Sharing of Tie Capacity is an artificial market barrier	National	Undecided	Limited

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59	Congestion Management	Standardize and Coordinate ATC Calculations	Coordinate Hedging Instruments at Market Interfaces	Inter-control area congestion management / parallel flow management	Develop congestion hedges across control area boundaries.	Regional	NYISO/ISO-NE	Northeast ISO
44	Congestion Management	Standardize and Coordinate ATC Calculations	Standardize TRM and CBM Calculations	Calculation and Values of TRM and CBM consistent	Underutilization of Transmission Capacity	National	NERC	Limited
17	Congestion Management	Standardize and Coordinate ATC Calculations and Postings	Reconcile ATC Calculations Between Physical and Financial Transmission Markets	TTC-ATC calculation/posting	Interface between a financial market (no physical transmission arrangements) and physical transmission regions (selling transmission capacity through OASIS reservations): Problems of TTC-ATC calculations coordination. Counterparties include IMO, NYISO, and ISO-NE.	Regional	Undecided	No
61	Congestion Management	Standardize and Coordinate ATC Calculations and Postings	Reconcile ATC Calculations Between Physical and Financial Transmission Markets	Market Design - Prior to Day Ahead. Congestion Revenue Rights (CRRs) [Firm Transmission Rights (FTRs) in MD02, FTOs in RTO West]	Are all transmission rights both physical and financial required to be identical to mitigate the seams problems? (Issue #1.a.2)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
9	Congestion Management	Standardize and Coordinate ATC Calculations and Postings		Transmission Calculations	Transmission calculations are not consistent. Solution: Standardized ATC Calculations.	National	Undecided	Yes - SSG - WI
55	Congestion Management	Standardize and Coordinate ATC Calculations and Postings		Improved TTC/ATC posting	Monthly and yearly posting of TTC/ATC values to support transaction pre-scheduling. Clarify how the ATC values calculated by each ISO should be used to ascertain the ability of the interface to support transactions.	Regional	Undecided	Northeast ISO
109	Congestion Management	Standardize and Coordinate ATC Calculations and Postings		ATC Differences - Individual control areas determine ATC for jointly operated transmission interfaces. Differences in ATC calculations can confuse the marketplace, which may react by avoiding transactions that would otherwise be economic due to the uncertainty and perceived risk.		Regional	Undecided	In Northeast Power Markets Seams Action Plan
116	Congestion Management	Standardize and Coordinate ATC Calculations and Postings		ATC/AFC Coordination - MISO and PJM to coordinate with any external parties wishing to do so, respecting all significant flowgates external to their respective boundaries; availability and levels of service and curtailments for firm and non-firm, network and point to point.		Regional	Undecided	In PJM/MISO Congestion Management Proposal Whitepaper
20	Congestion Management	Standardize TTC Calculations Across Interfaces		TTC coordination	Disagreement between two operators on the physical capability of an interconnection (line 7040 and Phase II). Counterparties are NYiso and ISO-NE.	National	NERC	Yes

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69	Congestion Management	System Market Modeling Coordination	Standardize Prices at Market Interfaces	Market Design - Day Ahead. Energy Spot Market	In order to achieve a uniform set of redispatch prices, if that is necessary, do the network models have to be identical, with the exact system? Each time each one is used does it have to be synchronized with the other RTOs or is a single process required? In addition do the programs that use the models have to be identical in order to get the uniform set of redispatch prices? (Issue I.b.2)	Regional	Undecided	SSG-WI, CMA Work Group
47	Congestion Management	System Market Modeling Coordination		Operational Model Updates	Areas must have up to date models for operational use of other areas across the seam	National	NERC	Limited
75	Congestion Management	System Market Modeling Coordination		Market Design - Day Ahead. Model objective function	Does the use of both AC and DC OPFs introduce compatibility problems? (Issue I.b.8)	Regional	Undecided	SSG-WI, CMA Work Group
121	Congestion Management	System Market Modeling Coordination		Market flow data - reflect ISN and SDX data	Standardize inputs to estimation of power flows (i.e., GLDFs, outages, etc...).	Regional	Undecided	In PJM/MISO Congestion Management Proposal Whitepaper
123	Congestion Management	System Market Modeling Coordination		GDLF calculation	Standardized methodology for determining distribution factors - standard OPF model for each interconnection?	Regional	Undecided	In PJM/MISO Congestion Management Proposal Whitepaper
135	Congestion Management	System Market Modeling Coordination		Historic NNL values should not be reflected indefinitely in the future, and an appropriate mechanism to rationalize the historic flows to recognize eventual market conditions should be developed		Regional	PJM/MISO	In PJM/MISO Congestion Management Proposal Whitepaper
133	Congestion Management	Transmission Market Design	Redispatch of Generation	Define "RTO area wide dispatch"	AJR - This refers to centralized dispatch across a RTO Footprint, rather than within a CA Boundary.	Regional	PJM/MISO	In PJM/MISO Congestion Management Proposal Whitepaper
110	Congestion Management	Transmission Market Design	Transmission Market Manipulation	ATC Manipulation - Market participants schedule transactions day-ahead and beyond with no intent to deliver energy. Cancellation in real-time by a market participant results in unused ATC, ramp capability that cannot be used by other market participants. Valuable capability is left unused.		Regional	PJM/ NYISO/ ISO-NE	In Northeast Power Markets Seams Action Plan
53	Congestion Management	Transmission Market Design	Transmission Service Product Type Priority	CAISO ETC rights scheduling - Contract Reference Number	CAISO uses Contract Numbers to track ETC rights. This causes Phantom Congestion and does not allow ETC rights holders to sell and schedule their transmission	Regional	Western Interconnect SSG-WI	No
88	Congestion Management	Transmission Market Design	Transmission Service Product Type Priority	Market Design - Day Ahead. Centralized Unit Commitment.	Does a recallable physical right conflict with a redispatch set in a day-ahead clearing process? (Issue I.b.21)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group

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98	Market Design	Energy Market Design and Coordination	Demand Side Energy Market Coordination	Market Design - Post Real Time. Settlement stages	How does bidding or demand-side response between or among RTO's affect the scheduling and dispatch of obligations within the RTO's? Can these kinds of trades between RTOs be accommodated? Does trade of these services between RTOs have implications for either the exporting or importing RTOs ability to meet reliability criteria? (Title to power needs to be established) (Issue II).	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
90	Market Design	Energy Market Design and Coordination	Hour Ahead & Real-Time Energy Market Coordination Across Market Interfaces	Market Design - Hour Ahead. Timing	How does hour-ahead market integrate with neighbors who do not have hour-ahead process? (Issue I.c.2)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
91	Market Design	Energy Market Design and Coordination	Hour Ahead & Real-Time Energy Market Coordination Across Market Interfaces	Market Design - Hour Ahead. Energy Market, Congestion Management Market, and Ancillary Services Market	Is it necessary to align real time markets? If so, can a method be developed to produce consistent real-time prices at the boundaries? (avoid an price discontinuity due to separate calculation of prices with different information.) (Issue I.d.1)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
93	Market Design	Energy Market Design and Coordination	Hour Ahead & Real-Time Energy Market Coordination Across Market Interfaces	Market Design - Real Time. Dispatch interval	Can a method be developed to produce consistent real-time prices at the boundaries? (avoid an price discontinuity due to separate calculation of prices with different information.) If not, can discontinuities be tolerated or managed? [This may be more of a settlements issue than a consistency issue.] (Issue I.d.3)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
131	Market Design	Energy Market Design and Coordination		Express sunset provisions for implementation of Day 2 markets		Regional	PJM/MISO	In PJM/MISO Congestion Management Proposal Whitepaper
113	Market Design	Green Power Market		Green power attributes trading		National	Undecided	In Northeast Power Markets Seams Action Plan
96	Market Design	Market Settlement Systems	Energy Market Settlement Process at Market Interfaces	Market Design - Real Time. Penalties	Do settlement systems have to be common as long as price discontinuities at the boundaries are managed? (Issue I.e.1)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
97	Market Design	Market Settlement Systems	Energy Market Settlement Process at Market Interfaces	Market Design - Post Real Time. Settlement stages	How are inter-RTO settlements managed? (Includes the revenue adequacy issues related to achieving consistent prices.) (Issue I.e.2)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group

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86	Market Design	Transmission Ancillary Service Market Design and Coordination	Ancillary Service Auction Coordination	Market Design - Day Ahead. Ancillary Service Market	All three propose auctions: Do the auctions have be identical? Is it possible to use price exchange (say as imputed bids) in connection with interactive calculation to minimize the spread between the A/S auctions? (Issue I.b.19)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
81	Market Design	Transmission Ancillary Service Market Design and Coordination	Ancillary Service Prices at Market Interfaces	Market Design - Day Ahead. Congestion Prices.	Can a "best practice" model for definition and acquisition of ancillary services products be developed to produce consistent prices at the RTO boundaries? (Issue I.b.14)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
16	Market Design	Transmission Ancillary Service Market Design and Coordination	Reactive Power Compensation	Compensation for Reactive Power	Lack of compensation lessens incentives for operators to solve problems and for accountants to spend money on metering.	National	Undecided	Yes / IIPTF
85	Market Design	Transmission Ancillary Service Market Design and Coordination	Transmission Service Requirements for Ancillary Service Delivery	Market Design - Day Ahead. Ancillary Service Market	Does the RTO of the A/S seller recognize the transmission capacity reservation required to enable the reserves to respond for outages in the RTO of the buyer? (Issue I.b.18)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
74	Market Design	Transmission Ancillary Service Market Design and Coordination		Market Design - Day Ahead. Model objective function	What is the effect of linking energy and ancillary service markets in the optimizations on model coordination issues? (Issue I.b.7)	Regional	Undecided	SSG-WI, CMA Work Group
83	Market Design	Transmission Ancillary Service Market Design and Coordination		Market Design - Day Ahead. Ancillary Service Market	When ancillary services are provided from within one RTO for another RTO, does the providing RTO recognize them as obligations within the seller's RTO? (Issue I.b.16)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
84	Market Design	Transmission Ancillary Service Market Design and Coordination		Market Design - Day Ahead. Ancillary Service Market	How can AS bids be coordinated across three markets to avoid both double counting and inefficient limitations on bids? (Issue I.b.17)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
87	Market Design	Unit Commitment Procedure Standardization		Market Design - Day Ahead. Acquisition Mechanism	Does unit commitment need to be standardized? Is this an area where each RTO can have its own method, which matches its resource mix and system responsiveness? (Rapid response of hydro gen. versus lead time requirements for thermal gen.) (Issue I.b.20)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
13	Market Design	Unscheduled/Parallel Path Flow Management	Compensation for Unscheduled/Parallel Path Flow	Compensation for Unscheduled Flows of Electricity	Lack of compensation lessens incentives for operators to solve problems and for accountants to spend money on metering.	National	Undecided	Yes / IIPTF

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15	Market Design	Unscheduled/Parallel Path Flow Management	Compensation for Unscheduled/Parallel Path Flow	Compensation for Loop Flow	Lack of compensation lessens incentives for operators to solve problems and for accountants to spend money on metering.	National	Undecided	Yes / IIPTF
29	Market Design	Unscheduled/Parallel Path Flow Management	Compensation for Unscheduled/Parallel Path Flow	Allocation of transmission capacity on reciprocal flow gates amounts to transmission service without compensation. Legitimizes "parallel loop flow".		National	Undecided	
66	Market Design	Unscheduled/Parallel Path Flow Management	Compensation for Unscheduled/Parallel Path Flow	Market Design - Prior to Day Ahead. Duration	How will rights for loop flows (non-contract flows) in other RTOs be allocated/acquired? (Issue I.a.7)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
134	Market Design	Unscheduled/Parallel Path Flow Management	Compensation for Unscheduled/Parallel Path Flow	Compensation for parallel flows		National	NAESB	In PJM/MISO Congestion Management Proposal Whitepaper
142	Market Design	Unscheduled/Parallel Path Flow Management	Compensation for Unscheduled/Parallel Path Flow	Pricing for native load loop flow impacts		Regional	Multiple	No
77	Market Monitoring/ Compliance	Anti-Gaming Coordination		Market Design - Day Ahead. Schedule Components	Will different RTO congestion management systems enhance opportunities for gaming or affect generation dispatch efficiency? (Issue I.b.10)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
11	Market Monitoring/ Compliance	Market Monitoring Entity Requirements		Market Oversight	New and mature markets need oversight to ensure that existing rules are complied with and new rules are adequate in meeting the scenarios they were designed to govern. Solution: Independent Market Auditor or Monitor.	Regional	Multiple	Yes - SSG - WI
94	Market Monitoring/ Compliance	Penalty/Sanction Coordination		Market Design - Real Time. Imbalance Price	Do penalties need to be the same in each RTO? (Issue I.d.4)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
95	Market Monitoring/ Compliance	Penalty/Sanction Coordination		Market Design - Real Time. Penalties	Will inconsistent imbalance penalty practices hamper non-dispatchable resource sales across RTO boundaries? (Issue I.d.5)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
3	Market Standards	Energy Market Standard Product Definitions		Definition & treatment of Firm/nonfirm Power	Annual Plan Item 4ci moved from MOS	National	Undecided	No
10	Market Standards	Energy Market Standard Product Definitions		Energy Products	Entities have disagreements concerning the definitions of various energy products. Solution: Standardized Energy Products.	National	NAESB	Yes - WECC

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25	Market Standards	Energy Market Standard Product Definitions		Need for common physical market and products - regional variations permitted		National	NAESB	No
34	Market Standards	Energy Market Standard Product Definitions		Clarification of Product Definitions	Complete/Standard definitions for Liquidated Damages (LD), "Into", etc.	National	NAESB	No
139	Market Standards	Energy Market Standard Product Definitions		Standard definition of energy products	Energy products and services have common attributes in all markets. Standards definitions will improve efficiencies in communicating and operating between areas with various market designs	National	NAESB	Yes
7	Market Standards	Market Standard Communication Protocols and Transparency		Market Price Information	Market pricing methodology not comprehensive, consistent or dependable. Solution: Standardized Indices, Independently Managed.	Regional	Western Interconnect	No
42	Market Standards	Market Standard Communication Protocols and Transparency		Data Visibility	Inability to view neighboring markets information through a common software such that this sometimes hinders Market Participants ability to complete business in a timely fashion.	National	NAESB	Yes
52	Market Standards	Market Standard Communication Protocols and Transparency		Confidentiality of Data and Information Shared	Standards of Confidentiality would enhance the capability to resolve data sharing and information posting	National	NAESB	Limited
71	Market Standards	Market Standard Communication Protocols and Transparency		Market Design - Day Ahead. Model spatial granularity	To what extent do RTOs need to see other RTOs' scheduling information? (Issue I.b.4)	Regional	Undecided	SSG-WI, CMA Work Group
140	Market Standards	Market Standard Communication Protocols and Transparency		Standard messaging protocols for market notifications	Market participants will benefit from common messaging protocols.	National	NAESB	No
1	Market Standards	Market Standard Operating Time		Non Standard Time Zone	The lack of a standard Time Zone causes Market Inefficiencies	National	NAESB	No
136	Market Standards	Market Standard Operating Time		Inconsistent Market Event Timelines	There is a disconnect between the timing of bids and offers in the Ontario market and the releasing of firm transmission in MISO for which schedules have not been submitted for use as non-firm transmission.	Regional	Undecided	No
137	Market Standards	Market Standard Operating Time		Inconsistent Market Event Timelines	Timing issues between bid based markets (one example only - not knowing whether your bid has been accepted in "sink" market before having to commit in the "source" market).	Regional	IMO/NYISO	No
14	Market Standards	Physical and/or Financial Resolution of Inadvertent Interchange		Compensation for Inadvertent Interchange	Lack of compensation lessens incentives for operators to solve problems. Explicit compensation for inadvertent interchange is necessary for appropriate definition of other products, in that such compensation ensures that the defined product is delivered.	National	NAESB	Yes / IIPTF

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111	Market Standards	Transmission Ancillary Service Market Design and Coordination	ICAP Market Standardization	Capacity Market - Differences in ICAP definitions, requirements, deliverability, and recall procedures have hampered the ability of suppliers to sell ICAP between Northeast ISOs (include regional resource adequacy model, external 30-minute reserves participation, harmonize demand response programs)		Regional	PJM/ NYISO/ ISO-NE	In Northeast Power Markets Seams Action Plan
46	Planning	Transmission Expansion and Generator Interconnection Coordination	Generator Interconnection - Affected Systems	Generation Interconnection Studies	Generation Interconnections close to seam affects both areas	National	Undecided	Limited
57	Planning	Transmission Expansion and Generator Interconnection Coordination	Generator Interconnection Transmission Requirements	Transmission interconnection procedures	Need consistent approach to treating merchant generation interconnection procedures with transmission	Regional	Multiple	Northeast ISO
114	Planning	Transmission Expansion and Generator Interconnection Coordination	Interregional Transmission Planning Procedures	Coordination of interregional planning including transmission facilities and generator interconnection procedures		Regional	Undecided	In Northeast Power Markets Seams Action Plan
26	Planning	Transmission Expansion and Generator Interconnection Coordination	Transmission Expansion Cost and Construction Responsibilities	Transmission expansion planning - coordination between systems and determine who is obligated to build and pay for improvements	Being reviewed by PJM/MISO.	Regional	Multiple	Yes
48	System Reliability	Emergency Operations	Computer Failures	Communication of Computer Failures	Needed for reliable operations and emergency operations	National	NERC	Limited
49	System Reliability	Emergency Operations	Emergency Operating Procedures for Market Interfaces	Emergency Procedures	Emergency procedures require operations across seams	National	NERC	Limited
128	System Reliability	Emergency Operations	System Monitoring and Contingency Plans	Contingency plans; critical path analysis		National	NERC	In PJM/MISO Congestion Management Proposal Whitepaper
118	System Reliability	Emergency Operations	System Restoration Procedures	Emergency and Restoration Plans - operating procedures for Voltage Collapse and Stability		National	NERC	Included in Attachment A of MISO and PJM Reliability Plans
122	System Reliability	Functional Model		Control area - control zone responsibilities vs. market operator		National	NERC	In PJM/MISO Congestion Management Proposal Whitepaper
50	System Reliability	Generation-Load Balance	Interchange Schedule Ramping Requirements	Schedule Ramp Management	Ramping standard differences across the seams hinder business	National	Undecided	Limited



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108	System Reliability	Generation-Load Balance	Interchange Schedule Ramping Requirements	Failure of Transactions due to Ramping of Control Area Interchange - Desirable transactions between control areas may be "blocked" from access to the grid due to insufficient dispatch capacity to absorb large schedule changes while maintaining energy/load balance within the control area.		Regional	Undecided	In Northeast Power Markets Seams Action Plan
51	System Reliability	Generation-Load Balance	Inter-Market Resource Requirements	Resource Adequacy	Parties in one area rely on resources in other areas. Validation of their reliance on the other area must be coordinated.	National	NERC	Limited
27	System Reliability	Inter-Market and Intra-Market Facility Outage and Maintenance Coordination		Outage Maintenance Coordination	Being reviewed by PJM/MISO. See PJM presentation "Status Report to FERC on July 31, 2002 Alliance Order" dated Jan 2003, page 6 as posted under NAESB WEQ Seams subcommittee July 8 date	National	NERC	Yes
45	System Reliability	Inter-Market and Intra-Market Facility Outage and Maintenance Coordination		Coordination of Transmission and Generation Outages	Both forced and planned outages	National	NERC	Limited
120	System Reliability	Inter-Market and Intra-Market Facility Outage and Maintenance Coordination		Facilities in close electrical proximity under different RTOs - outage maintenance coordination, access and expansion planning		Regional	Undecided	In PJM/MISO Congestion Management Proposal Whitepaper
30	System Reliability	Operate Markets Within Transmission Limits		Market allocations over flow gates are approved without regard to flow gate capacity resulting in over subscription of flow gates.		National	NERC	
99	System Reliability	Operating Reserves/Resource Adequacy	Energy and Reactive Capacity Reserve Requirements	Demand Response Participation.	If there is an RTO capacity requirement for all RTOs, how will double-counting across RTOs be avoided? Note: RTO West and WestConnect are not currently proposing a resource adequacy requirement independent of the requirement for balanced schedules. (Issue X.1).	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
100	System Reliability	Operating Reserves/Resource Adequacy	Energy and Reactive Capacity Reserve Requirements	Resource Adequacy. Resource Adequacy Assessment.	If there is an RTO capacity requirement for all RTOs, do different resource adequacy approaches result in different penalty structures and if so, does this create problems, e.g., opportunities for arbitrage? Note: RTO West and WestConnect are not currently proposing a resource adequacy requirement independent of the requirement for balanced schedules. (Issue X.2).	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group

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(As Adopted at JIC Meeting, Feb. 18-19, 2004)

Orig #	Category	1ST Sub-Category	2ND Sub-Category	Description of Seam Issue	Comments	Issue Type	Resp Org JIC	Currently Being Addressed
119	System Reliability	Operating Reserves/Resource Adequacy	Energy and Reactive Capacity Reserve Requirements	NERC Regional Criteria and Reserve Sharing - define operating policy changes, waivers, or certifications that are needed to permit security-constrained dispatch over multiple existing control areas to allow flows not to be tagged; Joint Reliability Coordination - NERC Policies 5 and 9		National	NERC	In PJM/MISO Congestion Management Proposal Whitepaper
82	System Reliability	Operating Reserves/Resource Adequacy	Reliability Aspects of Inter-Market Scheduling of Ancillary Services	Market Design - Day Ahead. Ancillary Service Market	How does bidding of ancillary services between or among RTOs affect the scheduling and dispatch obligations within the RTOs? Can this kind of trade between RTOs be accommodated? Does trade of these services between RTOs have implications for either the "exporting" or "importing" RTO's ability to meet reliability criteria? (Issue I.b.15)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
107	System Reliability	Transaction Curtailments	Market Impacts of Transaction Curtailments for Reliability Reasons	Transaction Curtailment - Transaction curtailments for security may extend beyond the reliability need due to differences in market timing. Extended curtailments are disruptive to both the marketplace and the reliable operation of the grid.		Regional	PJM/ NYISO/ ISO-NE	In Northeast Power Markets Seams Action Plan
126	System Reliability	Unscheduled/Parallel Path Flow Management	Interchange Distribution Calculator Requirements	Definition of coordination between market entity (PJM or MISO) and the IDC; define necessary changes to IDC; updates of base cases and book of flowgates		Regional	Undecided	In PJM/MISO Congestion Management Proposal Whitepaper
127	System Reliability	Unscheduled/Parallel Path Flow Management	Interchange Distribution Calculator Requirements	Industry oversight and reporting of PJM and MISO impact calculations - IDC cost, cost allocation to reimburse NERC		Regional	PJM/MISO	In PJM/MISO Congestion Management Proposal Whitepaper
23	System Reliability	Unscheduled/Parallel Path Flow Management	Parallel Path/ Unscheduled Flow Monitoring and Operation	How different congestion management methodologies will interact to ensure parallel flows and impacts are recognized and controlled to ensure system reliability.	Being reviewed by PJM/MISO.	Regional	Undecided	Yes
24	System Reliability	Voltage Control		Voltage Operating Procedures	Being reviewed by PJM/MISO. See PJM presentation "Status Report to FERC on July 31, 2002 Alliance Order" dated Jan 2003, page 6 as posted under NAESB WEQ Seams subcommittee July 8 date	National	NERC	Yes
5	System Reliability	Operating Reserves/Resource Adequacy	Energy and Reactive Capacity Reserve Requirements	Provision of reserves across multiple control areas	Annual Plan Item 4cii moved from MOS	National	NERC	No
39	Transaction Scheduling	Controllable Line Scheduling		Controllable Line Scheduling	Concept of operations for general methodology to schedule controllable lines between RTOs. Being reviewed by NYISO	Regional	Undecided	Yes

**Seams Issues Matrix**  
(As Adopted at JIC Meeting, Feb. 18-19, 2004)

Orig #	Category	1ST Sub-Category	2ND Sub-Category	Description of Seam Issue	Comments	Issue Type	Resp Org JIC	Currently Being Addressed
58	Transaction Scheduling	Controllable Line Scheduling		Controllable line scheduling	Concept of Operations for general methodology to schedule controllable lines has been drafted. A multi-ISO stakeholder group (similar to JCAG) needs to be formed to review the draft Concept of Operations to provide stakeholder input.	Regional	NYISO/ISO-NE	Northeast ISO
60	Transaction Scheduling	Controllable Line Scheduling		Cross-border price convergence	The lack of price convergence at the control area boundaries may inhibit the desire of market participants to arbitrage between neighboring markets. This issue is being referred to the individual ISO Market Committees for further definition on the business issue that needs resolution.	Regional	NYISO/ISO-NE	Northeast ISO
12	Transaction Scheduling	Interchange Scheduling Standardized Protocols	Develop Electronic Scheduling	Interchange/Intrachange Scheduling Data Exchange	Current E-Tagging process is inadequate for exchanging reliability and market data within the Western Interconnection. Solution: Electronic Scheduling	National	NAESB	Yes - WECC
41	Transaction Scheduling	Interchange Scheduling Standardized Protocols	Inter-Market Ramping Requirements Standardization	Scheduling Coordination (including Ramp Rates)	RTOs have different ramp rates and scheduling requirements that require Market Participants to complete multiple submissions for the same transaction.	National	Undecided	Yes
79	Transaction Scheduling	Interchange Scheduling Standardized Protocols	Standardize Inter-Market Scheduling Timelines	Market Design - Day Ahead. Other Scheduling Requirements	Should the time intervals and submission times be synchronized to mitigate obstacles to inter-RTO trade? (Issue I.b.12)	National	NAESB	SSG-WI, CMA Work Group
78	Transaction Scheduling	Interchange Scheduling Standardized Protocols	Tools and Procedures to Accommodate Inter-Market Interchange Scheduling Requirements	Market Design - Day Ahead. Schedule Components	Can tools be developed for scheduling submission that assist the user in meeting any differences in protocols between RTOs? (Issue I.b.11)	National	Undecided	SSG-WI, CMA Work Group
8	Transaction Scheduling	Interchange Scheduling Standardized Protocols		Scheduling	Inconsistent procedures among entities. Solution: Western Interconnection Standardized Interchange Scheduling Protocols.	Regional	Multiple	Yes - SSG - WI
76	Transaction Scheduling	Interchange Scheduling Standardized Protocols		Market Design - Day Ahead. Model objective function	Do differences in the scheduling requirements (e.g., requirements for balanced schedules) between RTOs create seams problems for inter-RTO schedules? If so, can these problems be mitigated? (Issue I.b.9)	Regional	Undecided	SSG-WI, CMA Work Group
104	Transaction Scheduling	Interchange Scheduling Standardized Protocols		Transmission Checkout Failure - Operators curtail transactions due to mismatched tag data, different MW volumes, etc. The curtailment of transactions due to data incompatibility is disruptive to both the marketplace and the reliable operation of the grid.		National	NAESB	In Northeast Power Markets Seams Action Plan

**Seams Issues Matrix**  
(As Adopted at JIC Meeting, Feb. 18-19, 2004)

Orig #	Category	1ST Sub-Category	2ND Sub-Category	Description of Seam Issue	Comments	Issue Type	Resp Org JIC	Currently Being Addressed
106	Transaction Scheduling	Interchange Scheduling Standardized Protocols		Transaction Scheduling - Inconsistent information and market timing rules lead to uncertainty and risk that discourage the scheduling of some inter-regional transactions.		National	NAESB	In Northeast Power Markets Seams Action Plan
32	Transmission Service	Transmission Market Design	Transmission Service Product Type Priority	MISO- PJM market allocation will give preference to the market as Network over PTP even though the Market allocation may be a non paying transmission customer.		Regional	PJM/MISO	
40	Transmission Service	Transmission Market Standard Product Definitions and Priorities	Multiple Proxy Bus Development	Multiple Proxy Buses for Free Flowing Interfaces	Development of multiple proxy buses between RTOs for scheduling and pricing.	Regional	NYISO/ISO-NE/PJM	Yes
4	Transmission Service	Transmission Market Standard Product Definitions and Priorities		Definition & treatment of Firm/nonfirm Transmission	Annual Plan Item 4cii moved from MOS	National	Undecided	No
103	Transmission Service	Transmission Market Standard Product Definitions and Priorities		Transmission Service - Market participants require consistent treatment of transmission products across multiple control areas to reduce perceived market risk, scheduling confusion and uncertainty.		National	NAESB	In Northeast Power Markets Seams Action Plan
124	Transmission Service	Transmission Market Standard Product Definitions and Priorities		Wide area dispatch and network resources to network loads - resource deliverability if not a firm network load		Regional	PJM/MISO	In PJM/MISO Congestion Management Proposal Whitepaper
141	Transmission Service	Transmission Market Standard Product Definitions and Priorities		Replacement of contract path with flow-based transmission service		Regional	Multiple	No
54	Transmission Service	Transmission Service Pricing	Discounting of Market Interface Transmission ATC	Transmission service charge discounting	Ability for TOs to discount TSC rates on external interfaces to selectively reduce export charges and encourage use of ties. The software exists, however, there does not appear to be any business incentives to exercise discounts.	Regional	NYISO/ ISO-NE	Northeast ISO
22	Transmission Service	Transmission Service Pricing	Market Interface Transmission Service Pancaking	Rate pancaking elimination	Being reviewed by PJM/MISO.	Regional	PJM/MISO	Yes
38	Transmission Service	Transmission Service Pricing	Market Interface Transmission Service Pancaking	Rate Pancaking	Charges to Market Participants who conduct business over more than one RTO. Reciprocal agreements needed to eliminate these charges. NYISO and ISO NE	Regional	NYISO/ISO-NE	Yes
105	Transmission Service	Transmission Service Pricing	Market Interface Transmission Service Pancaking	Export Charges (Pancaking) - Control-area specific export charges remove incentives to transact business when transaction margins are of the same magnitude or less than the prevailing export charges. Such charges include transmission and ancillary service components.		Regional	PJM/ NYISO/ ISO-NE	In Northeast Power Markets Seams Action Plan

**Seams Issues Matrix**  
(As Adopted at JIC Meeting, Feb. 18-19, 2004)

Orig #	Category	1ST Sub-Category	2ND Sub-Category	Description of Seam Issue	Comments	Issue Type	Resp Org JIC	Currently Being Addressed
117	Transmission Service	Transmission Service Procurement	Common Reservation System for Market Interface Transmission ATC	Contract Tie Capacity - One Stop Shopping		Regional	NAESB	No
6	Transmission Service	Transmission Service Procurement	Common Western Interconnection Wide OASIS	Transmission Access	No transmission market one stop shopping available for the Western Interconnection - entities can't find needed information to efficiently conduct business on a preschedule or real-time basis. Solution: Common OASIS Site needed.	Regional	Undecided	Yes - Various Transmission Providers
89	Transmission Service	Transmission Service Procurement	Hour Ahead Transmission Service Market Standardization	Market Design - Day Ahead. Release of Unused Transmission Capacity after Close of DA Markets	How are boundary prices to be synchronized between RTO's if only one RTO has a hour ahead process? Is it necessary to align hour ahead markets? (Issue I.c.1)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
33	Transmission Service	Transmission Service Procurement	Intra-Hour Transmission Service Procurement	Standard for Purchasing of Intra-Hour Transmission	The ability to purchase transmission after the top of the hour when the transmission service is predetermined as available in prior hour.	National	NAESB	No
65	Transmission Service	Transmission Service Procurement	Long-Term Transmission Service for New Construction	Market Design - Prior to Day Ahead. Duration	To the extent that longer term transmission rights are needed for new construction, can agreement be reached to issue long term rights? (Issue I.a.6)	Regional	Western Interconnect SSG-WI	SSG-WI, CMA Work Group
67	Transmission Service	Transmission Service Procurement	Secondary Transmission Service Market Standardization	Market Design - Prior to Day Ahead. Primary Release Mechanism	There seems to be agreement here that a secondary market would be outside the RTO. If the resulting secondary market is not westwide, will coordination be needed? (Issue I.a.8)	Regional	Multiple	SSG-WI, CMA Work Group
112	Transmission Service	Transmission Service Procurement	Transmission Service for ICAP Market	Long-term Transmission Service Availability to Support ICAP Transactions - Firm transmission reservation requirements to establish "Deliverability" as a requirement to buy external ICAP results in an economic advantage for internal suppliers and a barrier to market entry for external suppliers.		Regional	PJM/ NYISO/ ISO-NE	In Northeast Power Markets Seams Action Plan
28	Transmission Service	Transmission Service Settlement	Consolidate Multiple Market Transmission Service Settlement Statements	Multiple transmission service charge invoicing	Being reviewed by PJM/MISO.	National	NAESB	Yes
56	Transmission Service	Transmission Service Settlement	Consolidate Multiple Market Transmission Service Settlement Statements	Multiple transmission service charge invoicing	Companies that conduct business across Control Area borders are faced with receiving a TSC bill from each TO. A single charge should be provided to each transaction to the appropriate parties and revenues allocated to the TOs according to the appropriate usage formulas.	Regional	NYISO/ISO-NE	Northeast ISO

#	Reference Paper or Supporting Document Provided
A	"Profit-Enhancing Seam Management: A White Paper on Pricing The Unscheduled Flows of Electricity Across the Seams Between Utilities Using A Geographically Differentiated Auction of Inadvertent Interchange", released 2001 March 25 (Mark Lively - Lively Utility).
B	"WOLF: Wide Open Load Following," A presentation to the NERC Market Interface Committee, 2002 September 4-5, Houston, Texas (Mark Lively - Lively Utility).
C	E-Mail by Mark Lively to NAESB WEQ Seams Subcommittee of 9/4/2003 8:28:10 PM Eastern Standard Time (Mark Lively - Lively Utility).
D	See the PJM/MISO JOA dated 8/5/03 (Linda Horn - WE Energies).
E	MISO - PJM Managing Congestion to Address Seam Paper, April 28, 2003 (Dave Nick - DTE Energy) (Ed. note: white paper updated Aug. 4, 2003).
F	<i>Intentionally left blank.</i>
G	Northeast ISOs Seams Resolution Report: History of Seam Issues Resolution (Jan. 15, 2003); and Ongoing Northeast ISOs "Seams" Projects, 2003-2004 (Jan. 14, 2003) (Joe Rossignoli - National Grid).
H	In Northeast Power Markets Seams Action Plan - October 9, 2002 and July 14, 2003, and July 3, 2003 timeline update (Jeff Mueller - PSEG).
I	Attachement A of MISO and PJM Reliability Plans (Jeff Mueller - PSEG).
J	MISO compliance filings in FERC Docket No. EL03-35-004 and in Whitepaper "Managing Congestion to Address Seams" PJM and MISO May 16, 2003 (Jeff Mueller - PSEG).
K	ATC's Attachment K (Jeff Mueller - PSEG).
L	M. Lively, Forcing Reserves to Compete with a Physical Market (2002) (Lou Oberski -- Dominion Energy).



# NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL

Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

## NERC-NAESB-ISO/RTO Council Joint Interface Committee

July 16, 2004  
FRCC Offices  
Tampa, Florida

### FINAL MINUTES

#### Attendance

##### NERC Members/Alternates

Linda Campbell, FRCC (Co-Chair)  
Mark Fidrych, WAPA  
Sam Jones, ERCOT  
Glenn Ross, Dominion  
Ed Schwerdt, NPCC  
Ed Tymofichuk, Manitoba Hydro (by phone)  
Gerry Cauley, NERC (Secretary)

##### IRC Members/Alternates

Karl Tammar, NYISO (Co-Chair)  
Bill Limbrick, IMO (by phone)  
Ed Riley, CAISO (by phone)  
Kent Saatoff, ERCOT (by phone)  
Charles Yeung, SPP  
Audrey Zibelman, PJM

##### NAESB Members/Alternates

Michael Desselle, AEP (Co-Chair)  
John Anderson, ELCON (by phone)  
Sydney Berwager, BPA (by phone)  
Ed Davis, Entergy (by phone)  
Andy Dotterweich, Consumers Energy (by phone)  
Alan Johnson, Mirant (by phone)  
Mary Ellen Paravalos, National Grid  
Tony Reed, Southern Company (for Barry Green)

##### Observers/Guests/Staff

Ken Brown, PSE&G (by phone)  
James Cargas, NAESB (by phone)  
Phil Cox, AEP (by phone)  
Joel Dison, Southern Company  
Ollie Frazier, Duke Power (by phone)  
Khaqan Kahn, IMO (by phone)  
Rae McQuade, NAESB  
Ed Thompson, Consolidated Edison (by phone)  
Bob Williams, FMPA  
John Simonelli, ISO-NE (by phone)

#### Membership

Charles Yeung, SPP, moves from NAESB Member to IRC Alternate, replacing Carl Monroe. Ed Riley, California ISO, replaces Ed Detmers as IRC Member.

#### Quorum

Secretary Cauley determined that a quorum of the JIC was present.

#### Antitrust

James Cargas of NAESB reviewed the antitrust guidelines.

## **Minutes**

The JIC approved the February 18–19, 2004, meeting minutes and the June 24, 2004, conference call minutes as presented.

## **Agenda and Meeting Objectives**

Michael Desselle reviewed the meeting agenda (**Exhibit A**) and the JIC adopted the agenda as submitted.

## **NERC Version 0 Standards Report**

Gerry Cauley presented an overview of Draft 1 of the NERC Version 0 Reliability Standards. NERC posted 62 proposed reliability standards on July 9, 40 operating standards and 22 planning standards. These draft standards adopt the functional model and reword the requirements into active “shall” statements.

The drafting team assumed that reliability coordinator requirements could be assigned to reliability authorities, as an interim step for Version 0. The drafting team determined it would not be possible to implement the interchange authority function in Version 0 standards, because major changes to the standards would be required. The group struggled somewhat interpreting the term “operating authority” as currently used in the operating policies, but made best judgments assigning appropriate functions and is seeking feedback from industry.

The drafting team also identified some Phase III and Phase IV planning measures that were approved by the Board, but never demonstrated to be practical through field testing. The drafting team is seeking industry feedback whether those measures should be part of Version 0.

The NERC Drafting Team recommended assignment of business practices in the following areas of the operating policies:

- Policy 1D and Appendix 1D — Time error correction procedures.
- Policy 1F — Inadvertent payback procedures.
- Policy 3 — Parts of Policy 3 addressing tagging procedures and E-Tag specifications.

## **NAESB Version 0 Standards Report**

Joel Dison presented an overview of Draft 1 of the NAESB Version 0 Business Practice Standards. The NAESB Business Practices Subcommittee (BPS) agreed with the NERC Version 0 Drafting Team (DT) in some areas, but identified additional business practices in the operating policies beyond those identified by the DT. In those areas, the BPS is recommending the development of “shadow” business practices which are identical to the reliability requirements. The purpose of the “shadow” standards is to provide a foundation for development of business practice standards in areas thought to contain significant commercial implications. In some cases the proposed business practice is a requirement within a standard. In other cases the proposed business practice is an attachment (former appendix or table, etc.) that both teams plan to reference as part of the standard.

In addition to the business practices identified above by the DT, the BPS identified business practice standards in the following areas:

- Policy 1 — ACE equation special cases.
- Policy 5 — Energy emergencies.
- Policy 9 — Portions of TLR procedure for the Eastern Interconnection (9C1, 9C1B, and 9C1C).



Some JIC members expressed concerns with the concept of NAESB developing “shadow” standards:

- Operating personnel having multiple sets of standards on the same topic.
- Difficulty in keeping duplicate standards in sync with future, diverging revisions.
- Difficulty of modifying reliability standards if NAESB files duplicate standards with FERC as business practices.

### **Assignment of Version 0 Standards Requests**

The Version 0 standards project is unusual because it is so broad. Typically, the JIC would review a request for a standard on a more narrowly defined topic and assign development to NERC or NAESB. The Version 0 requests were necessarily broad for both organizations. It was not until standard development began that the specific reliability standards and business practice standards could be identified. Thus the JIC finds itself reviewed a first draft of the standards to make judgments regarding appropriate assignments. It is important, however, that the JIC not evaluate or endorse any particular standard, but focus simply on assigning development.

The group noted that both sets of standards were just posted on July 9 and that the respective postings represented the best effort of the DT and the BPS. Public inputs have not been received on the recommended division of reliability and business practice standards, and neither the NERC nor NAESB committees have had an opportunity to formally consider the recommendations.

John Anderson noted that the JIC was established to minimize duplication, but in the case of Version 0 standards, duplication may be necessary to moving the project forward on schedule. If there is duplication of standards, they should be identical between NERC and NAESB. John recommended the JIC approve the assignment of standards development, including the identified areas of duplication, as posted by NERC and NAESB on July 9.

*John Anderson moved to approve the assignment of standards to NERC and NAESB as presented by the respective drafting teams and posted on July 9, 2004, by NERC and NAESB. The motion did not pass.*

Recognizing that there was agreement between the DT and BPS on most of the standards, the JIC felt it would be productive to focus attention on the smaller set of proposed standards where more work is needed to reach agreement on how to assign the standards development. The JIC agreed to divide the NERC and NAESB draft Version 0 standards into three groups:

1. Requirements which the NERC DT and the NAESB BPS agree should be reliability standards.
2. Requirements which the NERC DT and the NAESB BPS agree should be business practice standards.
3. Requirements which the NAESB BPS proposes to develop as “shadow” business practice standards.

*Michael Desselle moved that the JIC divide the standards requests into the three groups listed above. The JIC assigns the development of requirements in Group 1 above to NERC. The JIC requests that NERC and NAESB bring more specific recommendations for the assignment of proposed standards in Groups 2 and 3 for consideration by the JIC. Gerry Cauley, Phil Cox, and Joel Dison are requested to identify specific items listed in Groups 2 and 3. The JIC requests that NERC and NAESB designate a joint team to collaboratively resolve potential Group 2 and 3 conflicts no later than August 16. The motion was passed without objection.*

Group 2 was included in this review, because both NERC and NAESB are seeking public inputs through August 9 on the proposed business practice standards agreed upon by the DT and BPS.

Joint Interface Committee Meeting Final Minutes  
July 16, 2004

It was noted that both the NERC and NAESB work plans should continue as scheduled. The approach above does not require or anticipate any project delays. The JIC expects a collaborative effort in bringing back the recommendations on Groups 2 and 3. The principle groups and interests of NERC and NAESB should be represented on the group.

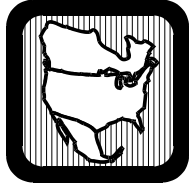
**Future Meetings**

The JIC agreed to meet on August 16, 2004, at 1 p.m. CDT in Houston to review the proposed recommendations in the Group 2 and Group 3 standards.

The JIC agreed to retain a tentative meeting date of September 21, 2004, to be confirmed at a later date.

**Adjourn**

There being no further business, the meeting was adjourned.



## NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL

Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

### NERC-NAESB-ISO/RTO Council Joint Interface Committee Meeting Agenda July 16, 2004 (11 a.m. to 3 p.m. EDT)

#### Meeting Location

FRCC Offices  
1408 N. Westshore Blvd., Suite 1002  
Tampa, FL 33607-4512  
Phone (813) 289-5644

#### Conference Line Information

Dial In Number: 888-810-3142  
Pass Code: JIC  
Conference Leader: Rae McQuade

#### Agenda

##### 1. Administrative Items

- a. Introductions
- b. Roster and Quorum
- c. Antitrust Guidelines
- d. February 18-19, 2004 Meeting Minutes (**Approve**)
- e. June 24, 2004 Conference Call Minutes (**Approve**)
- f. Meeting Agenda and Objectives

##### 2. Version 0 Standards Proposals

- a. NERC Version 0 Standards
- b. NAESB Version 0 Standards
- c. JIC Consideration of Proposed NERC and NAESB Version 0 Standards

##### 3. Review Other Proposed Standards Actions

- a. Vegetation Management SAR

##### 4. Other Business

- a. Other Business
- b. Future Meetings and Conference Calls

#### Adjourn



# NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL

Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

## NERC-NAESB-ISO/RTO Council Joint Interface Committee

NAESB Offices  
1301 Fannin, Suite 2350  
Houston, Texas 77002

August 16, 2004

### MINUTES (DRAFT)

#### Attendance

##### NERC Members/Alternates

Linda Campbell, FRCC (Co-Chair) [Phone]  
Mark Fidrych, WAPA [Phone]  
Scott Henry, Duke Power [Phone]  
Sam Jones, ERCOT [Phone]  
Ed Schwerdt, NPCC [Phone]  
Ed Tymofichuk, Manitoba Hydro [Phone]  
Gerry Cauley, NERC (Secretary)

##### IRC Members/Alternates

Karl Tammar, NYISO (Co-Chair)  
Dale McMaster, AESO [Phone]  
Ed Riley, CAISO  
Kent Saatoff, ERCOT [Phone]  
Charles Yeung, SPP

##### NAESB Members/Alternates

Michael Desselle, AEP (Co-Chair)  
John Anderson, ELCON [Phone]  
Sydney Berwager, BPA [Phone]  
Ed Davis, Entergy  
Barry Green, OPG [Phone]  
Alan Johnson, Mirant [Phone]  
Lou Oberski, Dominion Resources [Phone]  
Andy Dotterweich, Consumers (Alternate) [Phone]  
Tony Reed, Southern Company (Alternate) [Phone]

##### Observers/Guests/Staff

Bruce Balmat, MAAC [Phone]  
Scott Brown, Exelon [Phone]  
James Cargas, NAESB  
Phil Cox, AEP [Phone]  
Joel Dison, Southern Company  
Laura Kennedy, NAESB  
DeDe Kirby, NAESB  
Bill Lohrman, NERC  
Rae McQuade, NAESB

#### Introductions

Co-Chair Michael Desselle called the meeting to order and led introductions of those present and on the conference line.

#### Quorum

Secretary Gerry Cauley determined a quorum of the JIC was available to conduct business.

**Antitrust**

Jim Cargas of NAESB read the antitrust guidelines for conduct of the meeting.

**Agenda**

Co-Chair Desselle reviewed the meeting agenda. The agenda was approved by consent.

**Minutes**

Three editorial corrections were noted to the attendance list of the July 16, 2004, JIC minutes. With these revisions, Ed Riley moved to approve the July 16 minutes. The minutes were approved without objection.

**Joint NERC-NAESB Recommendation on Version 0 Standards**

Joel Dison and Gerry Cauley presented a joint NERC-NAESB recommendation on assignment of reliability standards and business practices. The recommendation is provided in **Exhibit A** and the presentation is in **Exhibit B**.

The JIC discussed the Transmission Loading Relief procedure, which is proposed to be developed in Version 0 as both a NERC and a NAESB standard. Several JIC members commented that the Version 0 TLR procedure should be identical in both organizations. It was noted that if any changes to the TLR procedure were requested after Version 0 is approved, they should be forwarded to the joint task force working on the Version 1 TLR procedure.

A concern was expressed that by approving the TLR procedure as a standard it could be interpreted that TLR was the exclusive standard for managing congestion in the Eastern Interconnection. Gerry Cauley noted that incorporating the TLR procedure into the NERC and NAESB Version 0 standards does not elevate the TLR procedure from its current status. The TLR procedure is one congestion management approach that is required for use in the Eastern Interconnection, but it is not an exclusive method. Regional and local congestion management, using market-based or other models, is allowed and encouraged, and will continue to be so once Version 0 is approved.

*John Anderson moved to approve the NERC SAR and NAESB standard request for the development of Version 0 reliability and business practice standards, respectively, as identified by the joint NERC/NAESB task force. Ed Davis seconded the motion.*

Co-Chair Desselle requested a roll call vote and the motion was approved unanimously as follows:

NERC		NAESB		IRC	
Linda Campbell	Approve	Michael Desselle	Approve	Karl Tammar	Approve
Scott Henry	Approve	John Anderson	Approve	Ed Riley	Approve
Mark Fidrych	Approve	Syd Berwiger	Approve	Dale McMaster	Approve
Sam Jones	Approve	Ed Davis	Approve	Kent Saatoff	Approve
Ed Schwerdt	Approve	Barry Green	Approve	Charles Yeung	Approve
Ed Tymofichuk	Approve	Alan Johnson	Approve		
		Lou Oberski	Approve		

### **Future Meetings**

The JIC set its next meeting for September 21 (1–5 p.m.) and September 22 (8 a.m.–noon) at NPCC offices in New York City. NPCC offered to provide lunch on the first day beginning at noon. The agenda is as follows:

- Assignment of standards requests to NAESB and NERC
- Preliminary review of 2005 annual plans

### **Adjourn**

There being no further business, the meeting was adjourned.

## NERC-NAESB Collaborative Proposal for Version 0 Business Practice Standards

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Results Based on Joint TF Meeting August 2-3, 2004

August 13, 2004

### **Background**

At its July 16, 2004, meeting the Joint Interface Committee (JIC) reviewed proposals from the NERC Version 0 Drafting Team and the NAESB Business Practices Subcommittee (collectively “the drafting teams”) for the assignment of Version 0 reliability standards and business practice standards. The JIC noted agreement between the two proposals on the vast majority of proposed Version 0 standards, including both reliability standards to be assigned to NERC and business practice standards to be assigned to NAESB.

There were, however, a few areas in which the proposals differed. The NERC drafting team considered a several of the proposed business practices to be too difficult to separate from the reliability requirements, requiring a substantial rewrite of the current NERC rules. A substantial rewrite of the current reliability rules is clearly not in the scope of the Version 0 project. The NAESB Business Practices Subcommittee accepted that position and recommended creating duplicate or “shadow” NAESB Version 0 standards in these areas to establish an equivalent baseline for developing future business practice standards.

The JIC took several actions at its July 16 meeting:

1. The JIC assigned to NERC the development of proposed reliability standards, as documented in NERC’s July 9, 2004, Version 0 reliability standards posting.
2. For the proposed business practice standards agreed to by the drafting teams, the JIC deferred assignment of those to NAESB, pending discussions at the NERC standing committee meetings the following week and the August 9 close of comment periods for the NERC and NAESB postings. The JIC felt that waiting a few weeks to be informed by a broader set of industry stakeholder inputs would be beneficial.
3. For the third set of proposed standards, in which the NERC drafting team proposed to develop a reliability standard and the NAESB team proposed to develop a “shadow” business practice standard, the JIC requested NERC and NAESB to assign a joint task force of committee leaders to collaboratively reconcile the proposals into a common recommendation.
4. The JIC requested this joint task force, if possible, to bring a single NERC-NAESB recommendation to the JIC for approval on August 16, after the close of the public comment periods and before the two drafting teams meet to continue working on their respective Version 0 standards.
5. The JIC noted that NAESB was not expected to slow its timetable for developing its proposed Version 0 business practice standards.

### **Joint Recommendation**

The NERC-NAESB joint task force met in Chicago on August 2-3 and prepared a proposal for assignment of Version 0 business practice standards as outlined below. The joint task force was successfully able to clarify the division of Version 0 reliability standards and business practices, such that there are no proposed duplicate standards, with one exception. The one exception is the Transmission Loading Relief (TLR) Procedure. The task force proposes that that NERC and NAESB adopt a TLR procedure document with the “same language and format” in their respective Version 0 standards and

immediately begin a joint project to develop replacement Version 1 standards distinguishing reliability requirements and business practices by the end of 2005.

The task force will review the recommendation a final time on August 13 after an analysis of public comments received by NERC and NAESB. Because the standards in question are all derived from the NERC operating policies, the NERC Operating Committee is also being asked to review the recommendation prior to August 13. The joint task force will submit its final recommendation to the JIC on August 16.

The recommendation was endorsed by the participants on the task force from both NERC and NAESB. The task force members at the meeting were:

<b>NERC</b>	<b>NAESB</b>
Mark Fidrych, WAPA (OC)	Michael Desselle, AEP (NAESB Board)
Michel Armstrong, TransEnergie (OC)	Lou Oberski, Dominion (WEQ EC)
Terri Grabiak, Allegheny (MC)	Scott Brown, Exelon (WEQ EC)
Wayne Lewis, Progress (MC)	Phil Cox, AEP (BPS)
Scott Henry, Duke Power (SAC)	Joel Dison, Southern (BPS)
Gerry Cauley, NERC (V0 Drafting Team)	Andy Rodriguez, PJM (BPS)
Bill Lohrman, NERC (MC)	Rae McQuade, NAESB
	DeDe Kirby, NAESB

***Recommended Assignment of Appendix 1A Sections B, C, and D (ACE Special Cases)***

**Proposed NERC Standard** – The NERC Version 0 Drafting Team has incorporated the control performance standards (CPS1 and CPS 2) into proposed Standard 001. To make this standard complete, the drafting team incorporated the ACE equation, definitions to support the ACE equation, and specific reliability requirements from Appendix 1A into the standard.

**Proposed NAESB Standard** – The proposed NAESB Version 0 Business Practice Standard addresses treatment of special cases of the ACE equation in Appendix 1A: Section B – Pseudo-Ties and Dynamic Schedules for Jointly Owned Units); Section C – Supplemental Regulation Service; and Section D – Load or Generation Transfer by Telemetry. Reliability requirements in the NERC standards will not be duplicated in the NAESB standard.

**References**

- NERC Version 0 Reliability Standard 001
- NAESB Version 0 Standard
- Appendix 1A

***Operating Policy 1D and Appendix 1D (Time Error Correction)***

**Proposed NERC Standard** – The NERC proposed reliability standard addresses four elements from Policy 1D Requirement 4: 1) the Time Monitor for an Interconnection must be a Reliability Authority (RA); 2) any RA in the Interconnection may halt a time error correction for reliability considerations (before or during the correction); 3) any Balancing Authority may request its RA to halt a time error



correction for reliability considerations, and 4) establishing frequency offset at 0.02 Hz. This standard is derived from Operating Policy 1D Requirement 4.

**Proposed NAESB Standard** – The NAESB proposed business practice standard is the time error correction procedure, exclusive of the reliability elements noted above. This standard incorporates Operating Policy 1D (excluding Requirement 4) and Appendix 1D.

**References**

- NERC Version 0 Reliability Standard 004
- NAESB Version 0 Standard
- Appendix 1D

***Operating Policy 1F (Inadvertent Interchange Payback Procedure)***

**Proposed NERC Standard** – The NERC Version 0 Drafting Team has developed a standard that includes the reliability requirements for inadvertent payback. This proposed standard excludes the inadvertent payback procedure (Policy 1F Requirement 5 and Appendix 1F). The NERC standard retains the inadvertent accounting and metering requirements necessary for reliability. NERC will evaluate whether a distinct dispute resolution procedure should be retained for inadvertent interchange, or whether NERC’s general dispute resolution procedure would be suitable, as suggested by the Version 0 Drafting Team. The Version 0 Drafting Team will be requested to review whether it should incorporate Appendix 1F Section C – On Peak and Off Peak Periods – into the NERC standard.

**Proposed NAESB Standard** – The NAESB proposed business practice standard incorporates the inadvertent payback procedure in Policy 1F and Appendix 1F, with modifications to exclude reliability requirements noted above and addresses only the payback and business practice aspects. NAESB would incorporate any aspects of accounting or dispute resolution that it needs for the business practices purpose of payback. (In future standard development efforts (e.g. Version 1), NAESB may establish additional levels of inadvertent granularity that might be needed for business practice or payback purposes. NERC will work with NAESB to try to optimize the collection and distribution of that information.)

**References**

- NERC Version 0 Reliability Standard 006
- NAESB Version 0 Standard
- Appendix 1F

***Operating Policy 3 and Appendices 3A1, 3A2, 3A3, 3A4, and 3D***

**Proposed NERC Standard** – The NERC and NAESB drafting teams were able to divide Operating Policy 3 into reliability and business practice requirements. NERC has proposed four standards on interchange addressing requirements for: tagging interchange transactions; assessing interchange transactions, communicating and implementing tagged interchange transactions; and modifying tagged interchange transactions. The NERC standards incorporate the tag timing requirements in Appendix 3A1. Omission of the tag data elements was an oversight and the drafting team will be requested to review Appendix 3A4 to identify tag data elements needed for reliability and incorporate them into the next posting of the Version 0 reliability standards.

**Proposed NAESB Standard** – The NAESB business practice standard is proposed to include the remaining portions of Policy 3 addressing business practice issues and Appendices 3A2 – Tagging Across Interconnection Boundaries, and 3A3 – Electronic Tagging Service Performance Requirements and Failure Procedures. Any tag data requirements in Appendix 3A1, 3A4, and 3D not considered by NERC

to be reliability requirements may be incorporated by NAESB into a business practice. If the comments indicate that the above five appendices (3A1, 3A2, 3A3, 3A4, and 3D) should remain with NERC, NAESB would be able to reference the appendices in their Version 0 CIBP Business Practice.

**References**

- NERC Version 0 Reliability Standards 010, 011, 012, and 013
- NAESB Version 0 Standard
- Appendices 3A1, 3A2, 3A3, and 3A4

***Operating Policy 5C***

**Proposed NERC Standard** – The proposed NERC standards address the reliability requirements of Operating Policy 5.

**Proposed NAESB Standard** – NAESB agrees to withdraw its proposed business practice in Version 0 that includes Operating Policy 5C requirement 2.1 and requirement 3. NAESB will propose that it later develop these as a Version 1 Business Practice.

**References**

None.

***Appendices 9C1, 9C1B, and 9C1C***

**Proposed NERC Standard** – NERC has proposed a set of standards that translates the entirety of Operating Policy 9 into reliability standards. The NERC Version 0 Drafting Team, although acknowledging significant business practices exist in the TLR procedures (Appendices 9C1, 9C1B, and 9C1C), believed that it was not possible in the time frame of the Version 0 project to rewrite the TLR procedure to separate reliability requirements from business practices. The drafting team proposes to incorporate the TLR procedure in its entirety into the Version 0 reliability standards, modified only to incorporate functional model language. The NERC drafting team will also request WECC and ERCOT to provide updates in Version 0 to Appendices 9C2 and 9C3 respectively.

**Proposed NAESB Standard** – NAESB proposes to adopt the TLR procedure (Appendices 9C1, 9C1B, and 9C1C) as a Version 0 business practice standard. The NAESB standard addresses only the Eastern Interconnection and does not propose to address WECC or ERCOT congestion management procedures.

**Additional Considerations**

1. NERC and NAESB should use the identical TLR procedure in their Version 0 standards.
2. NERC and NAESB should develop a joint plan for filing an update of the TLR procedure with the FERC.
3. NERC and NAESB should immediately begin a joint effort to update the TLR procedure to divide the reliability requirements and business practices and to incorporate other necessary improvements to the TLR procedure. The recommended target for retiring the duplicate Version 0 standards with the next version is end of 2005.

**References**

- Proposed Version 0 TLR Procedure
- Appendices 9C1, 9C1B and 9C1C

## Joint Interface Committee

Joint Recommendation for Version 0  
Business Practices

August 16<sup>th</sup> 2004

## Summary of July 16th JIC

- NERC presented a “generic” SAR to develop Version 0 reliability standards
  - Included a status report of the work to date
- NAESB presented a “generic” standard request to develop business practices associated with NERC’s Version 0 efforts
  - Included a status report of the work to date
- Concerns were presented...
  - NERC/NAESB drafting teams had not been able to completely resolve issues associated with business practices contained within existing policy
  - Potential for “duplication” existed
  - Other, related concerns were expressed

## Outcome of July 16th JIC

- Standards were divided into 3 “buckets”
  - Bucket 1: requirements that both NERC V0DT and NAESB BPS agreed were reliability requirements
  - Bucket 2: requirements that both NERC V0DT and NAESB BPS agreed were business practices
  - Bucket 3: requirements that that both NERC V0DT and NAESB BPS agreed had commercial implications, but which NERC needed to maintain; therefore NAESB BPS proposed to develop as “shadow” practices

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## Motion to resolve differences

Michael Desselle moved that the JIC divide the standards requests into the three groups listed above...

***The JIC requests that NERC and NAESB bring more specific recommendations for the assignment of proposed standards in Groups 2 and 3 for consideration by the JIC...***

***The JIC requests that NERC and NAESB designate a joint team to collaboratively resolve potential Group 2 and 3 conflicts no later than August 16.***

The motion was passed without objection.

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## Joint Task Force Members

### NERC Representatives

- Mark Fidrych, WAPA (OC)
- Michel Armstrong, TransEnergie (OC)
- Terri Grabiak, Allegheny (MC)
- Wayne Lewis, Progress (MC)
- Scott Henry, Duke Power (SAC)
- Gerry Cauley, NERC (VODT)
- Bill Lohrman, NERC (MC)

### NAESB Representatives

- Michael Desselle, AEP (BOD)
- Lou Oberski, Dominion (EC)
- Scott Brown, Exelon (BOD)
- Phil Cox, AEP (BPS)
- Joel Dison, SOCO (EC, BPS)
- Andy Rodriguez, PJM
- Rae McQuade, NAESB
- DeDe Kirby, NAESB

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## Joint Meeting

- Met in Chicago August 2-3
- Reviewed all “bucket 2” items to endorse VODT/BPS recommendation
- Reviewed and discussed all “bucket 3” items to resolve any differences and/or duplications

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## Results of Joint Meeting

- All “bucket 2” items were endorsed as proposed
  - Some minor changes were recommended to ensure removal of all reliability components
- All “bucket 3” items were assigned to either “bucket 1” (i.e. NERC) or “bucket 2” (i.e. NAESB) except for TLR Procedure
  - One item was withdrawn from Version 0 consideration
  - Joint assignment was made for the existing TLR procedure
- Details outlined in meeting notes

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## TLR Recommendation

- The TLR procedure will be “streamlined” based upon the NAESB proposal
  - Appropriate NERC/NAESB representatives will work together to finalize prior to the August 30<sup>th</sup> Draft 2 posting
- The TLR procedure will be a NAESB business practice standard and a part of NERC Standard 039

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## Other TLR Considerations

- The same language will be utilized at both NERC and NAESB
- NERC/NAESB to develop a coordinated plan for filing an update of the TLR procedure with FERC
- Joint Task Force will be established to develop “Version 1” by YE 2005
  - Separate reliability requirements and business practices
  - Incorporate other necessary improvements (e.g. IDC granularity task force recommendations)
  - Approval of Version 1 will retire the Version 0 TLR procedure at both NERC and NAESB

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## NERC/NAESB Endorsements of Recommendation

- The NAESB BPS approved the joint team’s recommendations Aug 10
- The OC endorsed the joint team’s recommendations Aug 11 and encouraged continued coordination between the NAESB BPS and NERC VODT.
- The SAC endorsed the process

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## Joint Recommendation

- All “bucket 1” items as identified by joint task force should be developed as reliability standards by NERC
- All “bucket 2” items as identified by joint task force should be developed as business practice standards by NAESB
- The TLR Procedure shall be developed jointly, shall use the same language, shall be approved separately, and a joint team established to develop “Version 1” by year end 2005.

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## Motion to Approve

Motion by \_\_\_\_\_ to approve the NERC SAR and NAESB standard request for the development of Version 0 reliability and business practice standards, respectively, as identified by the joint NERC/NAESB task force.

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## **Appendix III: Comments Received on the Proposed Standards**

### **OASIS Baseline Standards:**

Entergy Services, Inc.  
Midwest ISO

### **Modifications to OASIS Baseline Standards:**

Entergy Services, Inc.  
Hydro-Quebec Transenergie  
We Energies

### **Redirects:**

Puget Sound Energy Marketing  
First Energy  
Southern Company's Bulk Power Operations  
We Energies

### **Multiple Submissions:**

First Energy  
Hydro-Quebec Transenergie  
Southern Company's Bulk Power Operations

### **Posting Requirements:**

We Energies

### **Standards of Conduct:**

Hydro-Quebec Transenergie  
Southern Company Services  
Bonneville Power Administration  
We Energies  
NAESB ESS & ITS

### **Version 0 Business Practices:**

NERC Resources Subcommittee  
Salt River Project  
California ISO  
Mirant  
Allegheny Power  
Duke Energy  
Entergy Services  
ISO/RTO Council – SRC  
We Energies

**COMMENTS OF ENTERGY SERVICES, INC.  
REGARDING NAESB'S PROPOSAL TO ADOPT  
FERC'S CURRENT BUSINESS PRACTICES**

Entergy Services, Inc. supports NAESB's proposal to adopt the current OASIS Business Practice Standards and Communication Protocol Standards mandated by FERC Order Nos. 638 and 889. Entergy would like to emphasize, however, that NAESB's adoption of the FERC standards should not limit the flexibility already provided in therein. For example, Standard 2.1.5 defines the Fixed Yearly Service as the service starts at 00:00 on the first date of a calendar year and ends at 24:00 on the last date of the same calendar year (00:00 of the first date of the next consecutive year), and standard 2.1.9 defines a Sliding Yearly service as the service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. Standard 2.1, though, also provides that transmission providers may post different service periods and values, as an alternative to the Fixed and Sliding service options in standards 2.15 and 2.19. When Entergy evaluated these options, it found the Fixed Yearly Service defined in standard 2.1.5 very restrictive as it has to start on January 1 and has to end on December 31<sup>st</sup>. Entergy also found that the Sliding Yearly service is difficult to manage and set up the scheduling and billing systems for part of the month because it can start on any day. Therefore, consistent with standard 2.1, Entergy offers a version of Fixed Yearly service, which may start at 00:00 on the first date of any calendar month and end at 00:00 on the first date of the same month during the next year or any year thereafter. This provides flexibility to transmission customers and allows transmission providers to tailor scheduling and billing systems appropriately.

Additionally, Entergy believes that NAESB should view the FERC standards as only a starting point for the discussion of appropriate business practices for the electric industry. NAESB should remain open to appropriately supported modifications to the FERC standards, provided that such modifications are consistent with good utility practice and the reliable operation of bulk power electric system. Although the FERC standards are a good place to start the debate over uniform business practices, they should not be the final word. For example, while Section 4.4 and Table 4-3 provides process for competing bids, the process is confusing and needs clarification. The competing bid process should not be interpreted to allow transmission customers to reserve capacity, without ever confirming the service and without ever paying for the service. In particular, lengthy confirmation periods can result in pre-empting other transmission customers from using the valuable Constrained Resources. Another example involves the treatment of ancillary services. Although ancillary services as defined in Standards 2.5.1 – 2.5.6 are required to be offered and are posted on OASIS, it is often not possible to post the full details regarding these services under the templates that are approved by FERC. Additionally, if a transmission customer provides optional ancillary services (Schedule 3 – Schedule 6), the business practices do not establish an explicit process for making sure that they are in fact capable of providing these services. Lack of such process can result in compromising the reliability of the transmission network. These examples demonstrate that the FERC standards are a starting point for creating effective uniform business practices, but not should be considered immutable. NAESB should consider revisions to the FERC standards, provided that those revisions are appropriately supported and are consistent with good utility practice and reliability.

From: Terry Bilke  
Sent: Friday, February 06, 2004 8:37 AM  
To: naesb@naesb.org  
Subject: Wholesale Electric Quadrant Request For Comments

I received the announcement below indirectly and then found the posting on the NAESB site, but it was not clear to me how to submit comments. If there is a particular form and recipient, please let me know.

In general, the posted standard appears to be pro forma. Our ultimate comments depend on the expected disposition of the standard.

If the standard is to be voluntary and used by those that chose to do so, then this standard is fine. On the other hand, if it is NAESB's intention to file this with the FERC with the intention that it be adopted by jurisdictional entities, we have one procedural and one substantive concern.

From a procedural standpoint, it appears inappropriate to announce a nearly 400 page standard, to a very limited audience, with one month to comment (and no apparent process to assure thoughtful comments are addressed) before sending it to the NAESB Executive Committee for approval.

The primary concern we noted in the proposed standard was the timing requirements for processing of long-term Firm service requests. The timing is shorter than most transmission providers that are required to coordinate the sale of service with other neighboring providers and also have to perform system impact studies.

Again, since there was only a month available to go through this document, there may well be things we missed in a quick reading of it.

Respectfully,  
Terry Bilke  
Midwest ISO  
701 City Center Drive  
Carmel, IN 46032  
317/249-5463

**ENTERGY COMMENTS ON**  
**RECOMMENDATION R04005A**  
**NAESB OASIS 1A BUSINESS PRACTICE MODIFICATIONS**

Edward Davis  
September 20, 2004

Entergy suggests that expansion of the Pro Forma Tariff and OASIS requirements since the initial issuances make the following wording not specific to the provision of transmission service. Therefore, we suggest the following changes to the draft:

**“Standard 1: Provision of Open Access Transmission Service.** All transmission providers shall provide open access transmission service in accordance with the following requirements.

Applicability

Standard 1 applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce and to transactions limited to the provision of open access transmission service performed under the pro forma tariff required under currently applicable regulations.”

Entergy suggests expanding the legitimate reasons for denying access to include the provision of false information, as follows:

**Standard 3.1:** All entities or persons using OASIS shall register the identity of their organization (including DUNS number) or person at the OASIS Home Page at <http://www.tsin.com>. Registration identification shall include the parent entity (if any) of the registrant. Registration shall be a prerequisite to OASIS usage and renewed annually and whenever changes in identification occur and thereafter. An entity or person not complying with this requirement or providing false information may be denied access by a transmission provider to that transmission provider’s OASIS node.

## **NAESB WEQ RECOMMENDATION FOR STANDARDS**

### **OASIS 1A BUSINESS PRACTICES STANDARD MODIFICATIONS RECOMMENDATION R04005-A**

#### **HYDRO-QUÉBEC TRANSÉNERGIE COMMENTS September 20, 2004**

NAESB must prepare Business Standards that could apply internationally, meaning to Canadian entities also. This requires some adaptation work to this Recommendation.

The term "Commission" as defined in this Recommendation refers to FERC. That term should be replaced by "Appropriate Regulating Authority" (or some other term) and should be defined as the entity which has regulating authority over a given Transmission Provider. The whole document should then be revised with this international intent in mind (for example, this simplifies 1.5(f) that would then apply to "Appropriate regulating authorities staff" and the introduction to Standard 4.1 could be simplified to read only "All reservations and price...." Instead of "Consistent with FERC policy and regulations, all reservations and price...").

A Transmission Provider is not necessarily a "public utility". The definition should be broadened to include all possibilities and specify that it is used for those who provide Open Access to their electrical transmission System. As written the definition seems to encompass even systems which do not offer such access. The term "interstate" is also limiting regarding the international nature of a Business Standard. We also question that a Transmission Provider is not necessarily operating "interstate" even in the U.S. As a first try, the resulting definition for Transmission Provider could then read: "An entity that owns, operates or control facilities used for the transmission of electric energy and that offers open access transmission service over those facilities".

Submitted by Victor Bissonnette  
Délégué commercial  
Direction Commercialisation  
Hydro-Québec TransÉnergie

We Energies comments:

For all documents, definition of terms should be consistent with the NAESB Glossary and between documents. Inconsistencies were found in the definition of Affiliate, Transmission Customer, Firm Transmission, Non-firm Transmission, Point-to-Point Transmission Service, Network Service .

P. 10 of R04005-A, Standard 1.8 - A definition of "significant amount" is needed.

Thank you for the opportunity to comment.

Barb Kedrowski  
Project Manager  
We Energies



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Comments Submitted by: Susanne McFadden  
Puget Sound Energy Marketing**

**Dated: 11/10/04; 5:21 PM**

**1. RECOMMENDED ACTION:**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT  
RECOMMENDED ACTION:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:** This recommendation modifies the OASIS Business Practices to establish business practice standards related to the “redirection” of transmission service. These business practices address the provisions of Section 22 in the FERC Pro Forma Open Access Transmission Tariff related to the modification of Points of Receipt and/or Delivery for Firm Point-to-Point Transmission Service.

**RECOMMENDED STANDARDS:**

**Definitions to be added to the OASIS Business Practice standard**

**Capacity Available to Redirect** – the granted capacity of the Parent Reservation at the time of customer confirmation (CAPACITY\_GRANTED) less



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Electronic Scheduling Subcommittee and  
Information Technology Subcommittee  
**Request No.:** R04006-C  
**Request Title:** OASIS 1A Enhancements – Redirects

all confirmed reassignments (e.g., resales), confirmed redirects on a firm basis, confirmed redirects on a non-firm basis, displacements, and approved schedules.

**Parent Reservation** – an existing, confirmed reservation being modified by a Transmission Customer's request to redirect, reassign, resale, etc.

**Business Practices to be added to the OASIS Business Practice standard**

**Standard 9. Requirements for dealing with Redirects on a Firm basis.**

**9.1** – The Transmission Customer (TC) shall have the right to request modifications to Points of Receipt and/or Points of Delivery (including source or sink, where required) on a firm basis for a Confirmed Point-to-Point Firm Transmission Service reservation (i.e., Parent Reservation). This will be referred to as a Redirect on a Firm basis.

**9.1.1** – The TC may Redirect on a Firm basis any confirmed Firm Point-to-Point Parent Reservation regardless of the request type.

**9.1.2** - A request to Redirect on a Firm basis shall be submitted to the primary Transmission Provider with a request type of REDIRECT.

**9.1.3** - A request to Redirect on a Firm basis shall be queued and treated in the same manner as any other firm point to point request, subject to the other requirements of this standard.

**9.1.4** - No additional deposit shall be required for a request to Redirect on a Firm basis.

**9.2** - The TC shall be allowed to request a Redirect on a Firm basis for a portion or all of the Capacity Available to Redirect, even if the transmission scheduling rights on the Parent Reservation have been limited due to outages or other reliability-related events. An example is shown in Appendix B.

**9.3** - The TC shall be allowed to request a Redirect on a Firm basis for a portion or all of the time period of the Parent Reservation (i.e., bound by the start/stop times of the Parent Reservation). An example is shown in Appendix B.





## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and Information Technology Subcommittee

**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

**9.3.1** – A request for Redirect on a Firm basis must be submitted, and is subject to all request timing requirements consistent with a reservation for Firm service of similar duration.

**9.3.2** - A request for Redirect on a Firm basis must represent an established Firm Point-to-Point Service Increment (e.g., Daily, Monthly, etc.) offered by the Transmission Provider.

**9.4** The TC's rights on the Parent Reservation shall remain unaffected during the Transmission Provider evaluation of the request to Redirect on a Firm basis.

**9.4.1** - If the request to Redirect on a Firm basis is denied for any reason, all rights and obligations shall remain per the Parent Reservation. An example is shown in Appendix B.

**9.4.2** - The TC shall be allowed to submit and have pending multiple requests for Redirects on a Firm basis against the same Capacity Available to Redirect. The TP shall evaluate each such request with the knowledge that only those requests up to the Capacity Available to Redirect may ultimately be confirmed. An example is shown in Appendix B.

**9.5** - Upon confirmation of the request to Redirect on a Firm basis, the Capacity Available to Redirect shall be reduced by the amount of the redirected capacity for the time period of that Redirect. An example is shown in Appendix B.

**9.5.1** – The TC shall not confirm any request to Redirect on a Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to block any such confirmation. An example is shown in Appendix B.

**9.5.2** – The TC shall withdraw any request to Redirect on a Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to withdraw their acceptance of any request to Redirect on a Firm basis that cannot be confirmed due to limitations in the Capacity Available to



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and  
Information Technology Subcommittee

**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

Redirect by setting the OASIS standard STATUS data element to the value of SUPERSEDED. (The TC should not have to go in and remove all the Accepted requests if the capacity to redirect is depleted. TP's OASIS should automatically supercede remaining requests.)

**9.5.3** – Redirects on a Firm basis shall have all the rights and obligations of an original reservation for Firm service (with the exception of renewal/roll-over rights), including the rights to be Redirected on a Firm and/or Non-Firm basis.

**9.6** - For the purposes of curtailment and other capacity reductions, confirmed Redirects on a Firm basis shall be treated comparably to all other types of Firm Point-to-Point Service.

**9.6.1** - Curtailments or other capacity reductions to the remaining portion of the reserved capacity on the Parent Reservation shall not affect the Redirect reservation.

**9.6.2** - Curtailments or other capacity reductions affecting the reserved capacity on the Redirect reservation shall not affect the Parent Reservation nor result in a reinstatement of capacity on the Parent Reservation. (...result in the automatic reinstatement... Should also include "unless the TC submits a subsequent Redirect on a Firm Basis request")

**9.7** - Unless otherwise mutually agreed to by the primary provider and original customer, a request for Redirect on a Firm basis does not impact the TC's long term firm renewal rights (e.g., rollover or evergreen rights) on the original path, nor does it confer any renewal rights on the redirected path.

**9.8** - Any differences in charges associated with the Redirect on a Firm basis will be settled in accordance with the Transmission Provider's tariff.

**9.8.1** - If not addressed in the Transmission Provider's tariff or in a Service Agreement, a credit on the Parent Reservation shall be computed as the total reservation charge divided by the total megawatt hours reserved times the megawatt hours redirected. The redirected reservation shall be charged as if it were a reservation with a request type of ORIGINAL.



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

Requesters: Electronic Scheduling Subcommittee and  
Information Technology Subcommittee

Request No.: R04006-C

Request Title: OASIS 1A Enhancements – Redirects

### **Standard 10. Requirements for dealing with Redirects on a Non-Firm basis.**

**10.1** – The Transmission Customer (TC) shall have the right to request an alternate, or secondary, Point of Receipt and/or Point of Delivery (including source and sink, if required) on a non-firm basis for a Confirmed Point-to-Point Firm Transmission Service reservation (i.e., Parent Reservation). This will be referred to as a Redirect on a Non-Firm basis.

**10.1.1** – The TC may Redirect on a Non-Firm basis any confirmed Firm Point-to-Point Parent Reservation regardless of the request type.

**10.1.2** - A request to Redirect on a Non-Firm basis shall be submitted to the primary Transmission Provider with a request type of REDIRECT.

**10.1.3** - A request to Redirect on a Non-Firm basis shall be queued and treated in the same manner as any other non-firm point to point request, subject to the other requirements of this standard. (What does this imply? The TC is requesting secondary point- to-point service, not non-firm point-to-point service. It is a “as available” service subordinate to all other services (exception is Buy At Market))

**10.1.4** - Redirects on a Non-Firm basis shall have a service priority that is lower than non-firm hourly point-to-point service.

**10.1.5** - Requests for Redirects on a Non-Firm basis shall specify the following transmission service attributes in their request:

TS\_CLASS=SECONDARY

TS\_TYPE=POINT\_TO\_POINT

TS\_PERIOD, TS\_WINDOW, and SERVICE\_INCREMENT shall specify any valid value offered by the TP for Non-Firm Point-to-Point service.

**10.1.6** – Requests for Redirects on a Non-Firm basis shall be submitted by the TC as pre-confirmed. (Why pre-confirmed? This limits a customer’s options.)



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and  
Information Technology Subcommittee

**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

**10.2** - The TC shall be allowed to request a Redirect on a Non-Firm basis for a portion or all of the Capacity Available to Redirect, even if the transmission scheduling rights on the Parent Reservation have been limited due to outages or other reliability-related events. An example is shown in Appendix B.

**10.3** - The TC shall be allowed to request a Redirect on a Non-Firm basis for a portion or all of the time period of the Parent Reservation (i.e., bound by the start/stop times of the Parent Reservation). An example is shown in Appendix B.

**10.3.1** – A request for Redirect on a Non-firm basis must be submitted, and is subject to all request timing requirements consistent with reservations for Non-Firm Point-to-Point service of similar duration.

**10.4** The TC's rights on the Parent Reservation shall remain unaffected during the Transmission Provider evaluation of the request to Redirect on a Non-Firm basis.

**10.4.1** - If the request to Redirect on a Non-Firm basis is denied for any reason, all rights and obligations shall remain per the Parent Reservation. An example is shown in Appendix B.

**10.4.2** - The TC shall be allowed to submit and have pending multiple requests for Redirects on a Non-Firm basis against the same Capacity Available to Redirect. The TP shall evaluate each such request with the knowledge that only those requests up to the Capacity Available to Redirect may ultimately be confirmed. An example is shown in Appendix B.

**10.5** - Upon confirmation of the request to Redirect on a Non-Firm basis, the Capacity Available to Redirect shall be reduced by the amount of the redirected capacity for the time period of that Redirect. An example is shown in Appendix B. (OATT says in 22.1(3) the TC shall retain all of their scheduling rights on the parent. This statement limits the TC.)

**10.5.1** – The TC shall not confirm any request to Redirect on a Non-Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to block any such confirmation.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and  
Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**10.5.2** – The TC shall withdraw any request to Redirect on a Non-Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to withdraw their acceptance of any request to Redirect on a Non-Firm basis that cannot be confirmed due to limitations in the Capacity Available to Redirect by setting the OASIS standard STATUS data element to the value of SUPERSEDED. (The TC should not have to go in and remove all the Accepted requests if the capacity to redirect is depleted. TP's OASIS should automatically supercede remaining requests.)

**10.5.3** – The TC shall have the right to request the TP to release capacity associated with a confirmed request to Redirect on a Non-Firm basis and reinstate that capacity to the Parent (Firm) Reservation. The TP shall honor all such requests, and reinstate the capacity on the Parent Reservation such that it may subsequently be scheduled, Redirected on a Firm or Non-Firm basis to a different path, resold, etc. (OATT says in 22.1 (3) the TC shall retain all of their scheduling rights on the parent. This statement limits, the TC has to request to have their rights back.)

**10.6** - For the purposes of curtailment and other capacity reductions, confirmed Redirects on a Non-Firm basis shall be treated comparably to all other types of Non-Firm Secondary Point-to-Point Service.

**10.6.1** - Curtailments or other capacity reductions to the remaining portion of the reserved capacity on the Parent Reservation shall not affect the Redirect reservation.

**10.7** – Any differences in charges associated with a Redirect on a Non-Firm basis will be settled in accordance with the Transmission Provider's tariff.

**10.7.1** – Unless otherwise provided for in the TP's tariff, there shall be no charge to Redirect on a Non-Firm basis.

**10.8** - TPs shall have the right, but are in no means obligated, to accept requests for Redirect on a Non-Firm basis based on the submission of an Electronic Tag (ETAG)



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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**Request Title:** OASIS 1A Enhancements – Redirects

using protocols compliant with Version 1.7.095 NERC Transaction Information System Working Group (TISWG) *Electronic Tagging Functional Specification*. (If a TC can use E-Tag to request a Redirect on a Non-firm Basis, then the TC should also have the ability “release” capacity via E-Taf by referencing the parent reservation.)

**10.8.1** - The TC submitting a Redirect on a Non-Firm basis via a tag shall be subject to the same transaction timing requirements specified for submission of such requests directly on OASIS.

**10.8.2** - A TP accepting Redirects on a Non-Firm basis via ETAG shall allow a TC to request redirected service for one or more path segments of the tag by designating:

- (a) 1-NS as the transmission product code under the OASIS block,
- (b) the OASIS reservation identifier of the Firm Parent Reservation to be redirected, and
- (c) the secondary points of receipt and delivery being requested.

**10.8.3** - A TP accepting Redirects on a Non-Firm basis via ETAG shall determine the amount of the redirect request from:

- (a) The amount of the TP Product.
- (b) If the TP Product is not specified, the MW amount at the POR or POD for that TP in the Loss Table in accordance with the TP’s tariff
- (c) , if neither TP Product amount nor Provider Loss Table amounts are specified, the MW amount in the Energy Profile.

**10.8.4** - A TP accepting Redirects on a Non-Firm basis via ETAG shall consider the ETAG as a pre-confirmed Redirect request on a Non-Firm basis that is to be processed on a comparable basis with all such requests made directly on OASIS, with all obligations associated with such a request to be borne by the TC holding the Parent Reservation (e.g., any ancillary services, charges or credits for redirect, etc.), and subject to all other requirements of this Standard.

**10.8.5** - The OASIS queue time of a Redirect requested via ETAG shall be the TP’s ETAG Approval Service receipt time, unless a system failure requires the use of backup procedures, in which case the OASIS queue time shall be the time



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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**Request Title:** OASIS 1A Enhancements – Redirects

the ETAG is received by the TP. (How is the TP going to force the appearance and specified queue time into their OASIS?. How can this be comparable if some requests are on OASIS and other are off-OASIS)

**10.8.6** - Once an ETAG designating 1-NS service becomes implemented, the TP shall consider the associated Redirect request(s) to be confirmed.

### Appendix B – Redirect Standards Examples

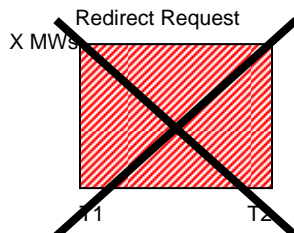
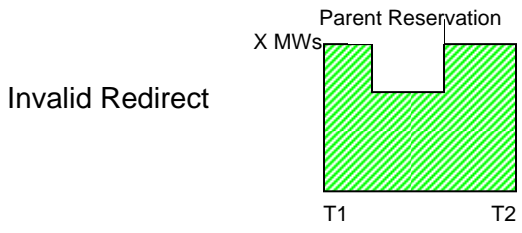
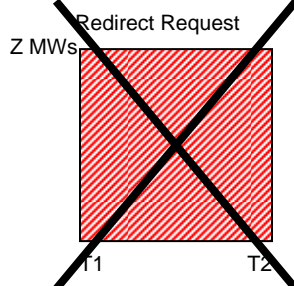
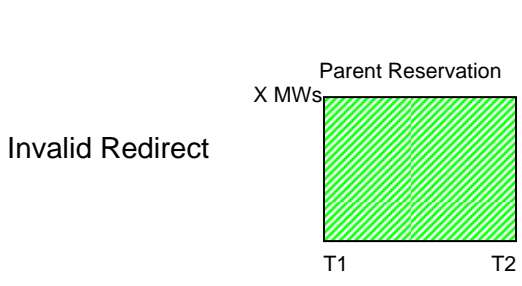
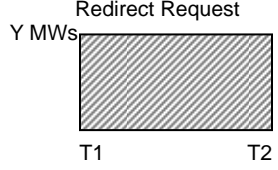
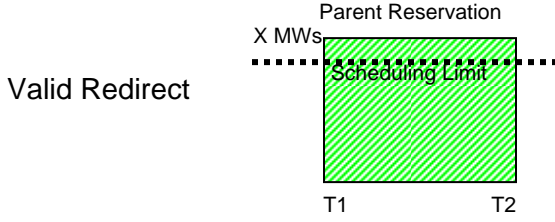
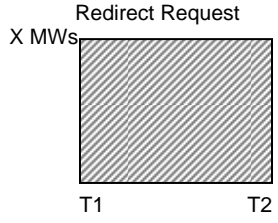
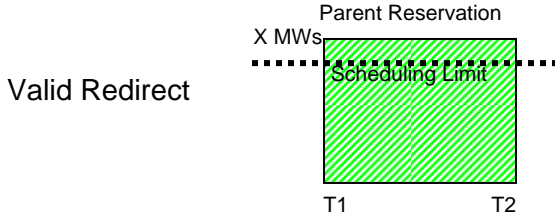
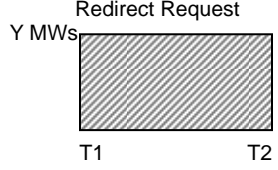
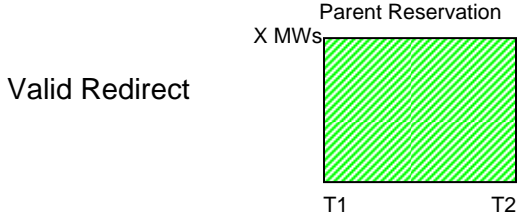
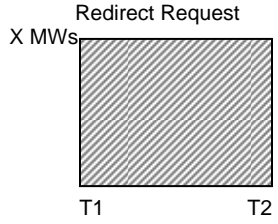
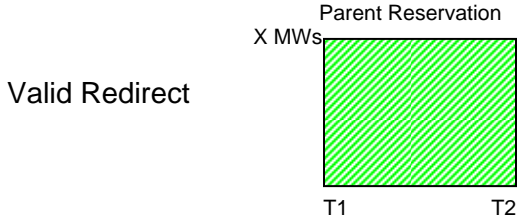
#### Standard 9.2 and 10.2

The Capacity requested for Redirects on a Firm or Non-Firm basis must be within the Capacity Available to Redirect of the Parent Reservation.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

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**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and Information Technology Subcommittee**

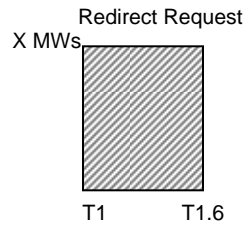
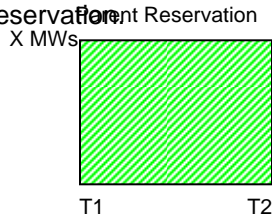
**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

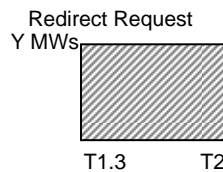
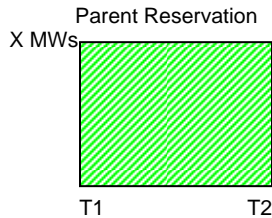
**Standard 9.3 and 10.3**

The Start/Stop times requested for Redirects on a Firm or Non-Firm basis must be within the Start/Stop times of the Parent Reservation.

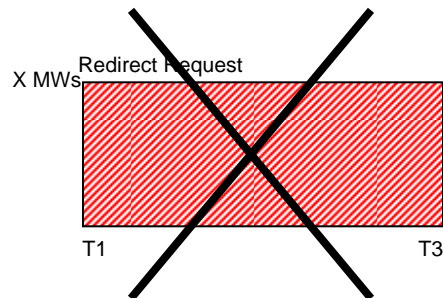
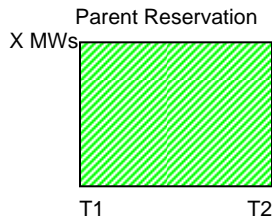
Valid Redirect



Valid Redirect



Invalid Redirect



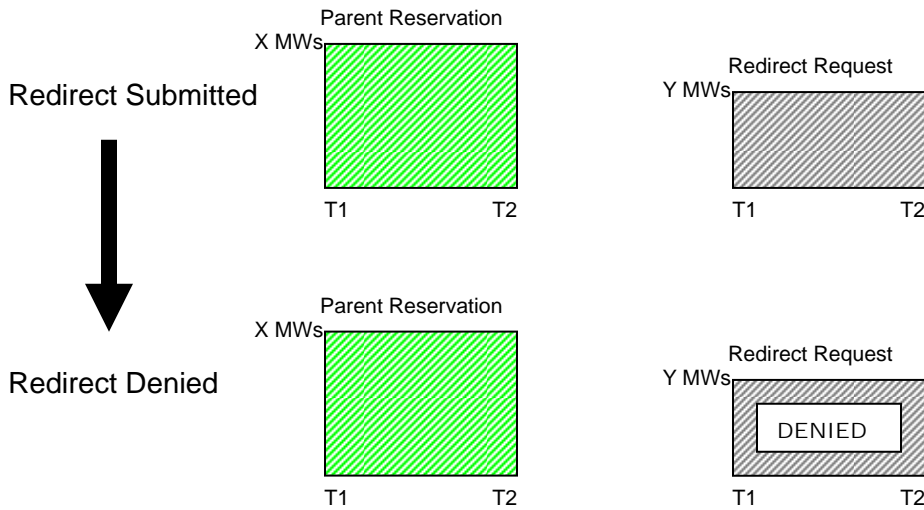


**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Electronic Scheduling Subcommittee and  
Information Technology Subcommittee  
**Request No.:** R04006-C  
**Request Title:** OASIS 1A Enhancements – Redirects

**Standard 9.4.1 and 10.4.1**

Capacity Available to Redirect on the Parent Reservation is not impacted by a denied request for Redirect on a Firm or Non-Firm basis.





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

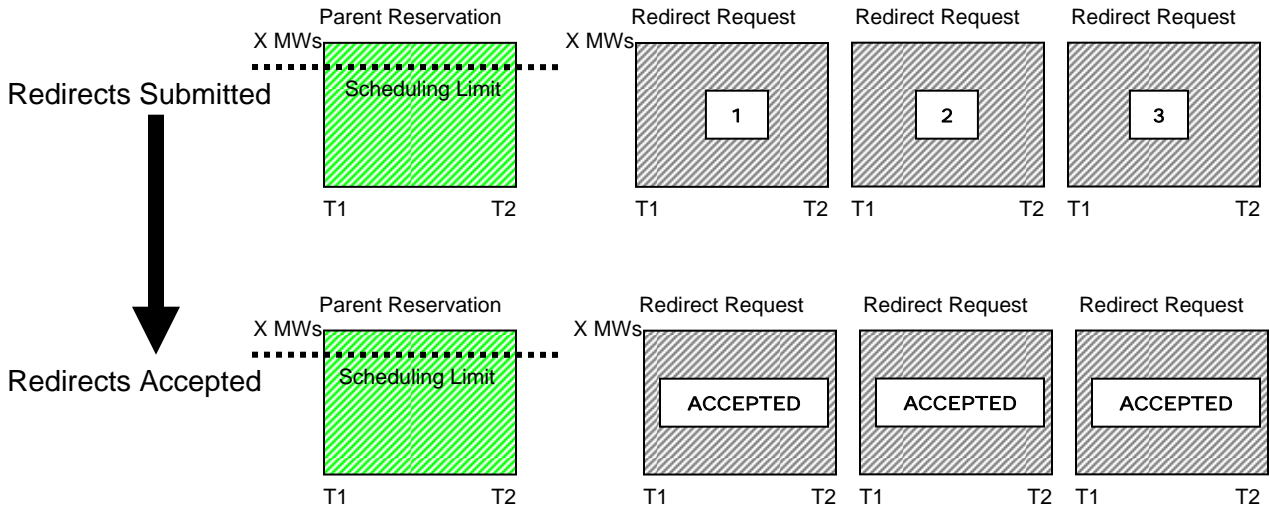
**Requesters: Electronic Scheduling Subcommittee and Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Standard 9.4.2 and 10.4.2**

Multiple requests for Redirect on a Firm or Non-Firm basis may be submitted for the same Capacity Available to Redirect on the Parent Reservation.



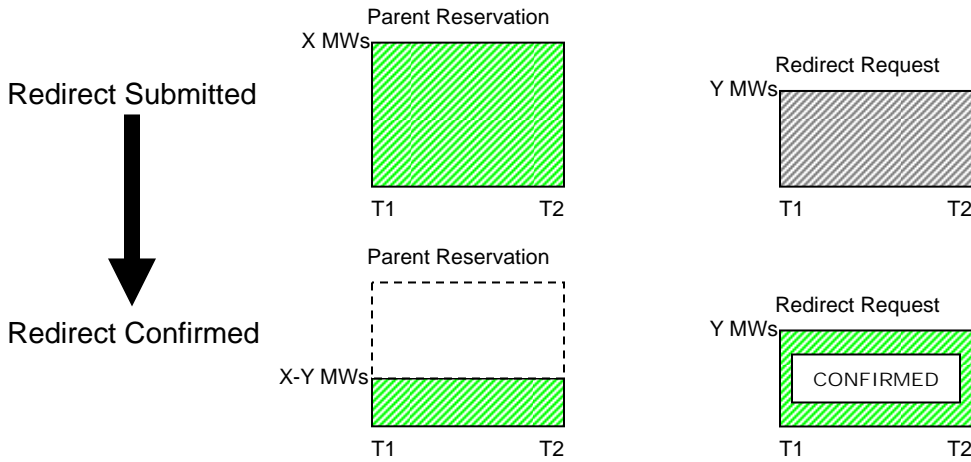


**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Electronic Scheduling Subcommittee and Information Technology Subcommittee  
**Request No.:** R04006-C  
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**Standard 9.5 and 10.5**

Confirmation of requests for Redirect on a Firm or Non-Firm basis reduces the Capacity Available to Redirect on the Parent Reservation.





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

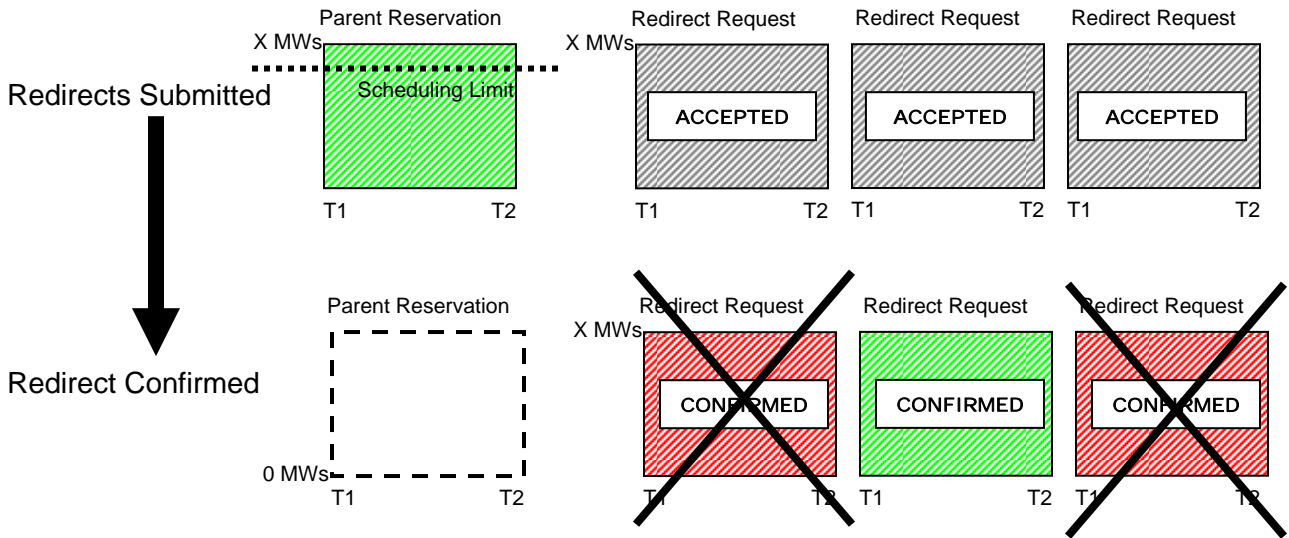
**Requesters: Electronic Scheduling Subcommittee and Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Standard 9.5.1 and 10.5.1**

Confirmation of requests for Redirect on a Firm or Non-Firm basis that exceed the remaining Capacity Available to Redirect on the Parent Reservation will be blocked.





## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and Information Technology Subcommittee

**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

### 4. SUPPORTING DOCUMENTATION

#### a. Description of Request:

Using OASIS to process and record redirects of transmission service is a difficult task. There are many issues related to the redirect and resale functionality, but most are caused by provider business rules or vendor design choices. The primary issue concerns redirects of transmission service. The current OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold (reassigned) transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as REDIRECTS, that use this resold or reassigned transmission service. This is only an issue when the 2nd customer wants to redirect transmission usage to a constrained path. Currently, unless the provider intervenes on the backend, that provider only has the option to deny this type of transaction when it is tagged.

#### b. Description of Recommendation:

The standard recommendation addresses the “primary issue” stated in the Standard Request: the business practices related to requests for a Redirect of transmission service on either a Firm or Non-Firm basis. The issue of the treatment of secondary market resale requests for redirected service are addressed in a separate Standard Recommendation specific to Resales.

The OASIS S&CP discusses redirection of service to alternate points of receipt and delivery in Section 4.2.13.9. This section did not explicitly state to whom such requests must be submitted. Redirected service requires an assessment of the transfer capability on the designated alternate points of receipt and/or delivery. Only the primary transmission provider is in a position to make such an assessment and authorize the redirected service under the OATT. Therefore, the OASIS S&CP is clarified in the recommended standard to explicitly require that all requests for redirected service must be submitted to the primary transmission provider for evaluation and approval. The recommended standard also addresses the settlement issue in the event that redirected service would increase or decrease the charges due to the transmission provider.

In support of the Recommendation Redirect of Transmission Service for a proposed business practice standard to the NAESB Executive Committee, please see the following sets of minutes:

WEQ OASIS 1A Task Force	February 13, 2004	<a href="http://www.naesb.org/pdf/weq_oasis1a_021304dm.pdf">http://www.naesb.org/pdf/weq_oasis1a_021304dm.pdf</a>
	July 14, 2004	<a href="http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc">http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc</a>
WEQ ESS	February 17-18, 2004	<a href="http://www.naesb.org/pdf/weq_ess021704fm.doc">http://www.naesb.org/pdf/weq_ess021704fm.doc</a>
WEQ ESS/ ITS	April 6, 2004	<a href="http://www.naesb.org/pdf/weq_ess_its040604fm.doc">http://www.naesb.org/pdf/weq_ess_its040604fm.doc</a>
	May 26-27, 2004	<a href="http://www.naesb.org/pdf/weq_ess_its052604dm.doc">http://www.naesb.org/pdf/weq_ess_its052604dm.doc</a>
	July 28-29, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its072804fm.doc">http://www.gisb.org/pdf/weq_ess_its072804fm.doc</a>



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Electronic Scheduling Subcommittee and  
Information Technology Subcommittee  
**Request No.:** R04006-C  
**Request Title:** OASIS 1A Enhancements – Redirects

August 17, 2004 [http://www.gisb.org/pdf/weq\\_ess\\_its081704fm.doc](http://www.gisb.org/pdf/weq_ess_its081704fm.doc)  
September 2, 2004 [http://www.gisb.org/pdf/weq\\_ess\\_its090204fm.doc](http://www.gisb.org/pdf/weq_ess_its090204fm.doc)  
September 29-30,  
2004 [http://www.gisb.org/pdf/weq\\_ess\\_its092904dm.doc](http://www.gisb.org/pdf/weq_ess_its092904dm.doc)  
October 6, 2004  
October 8, 2004

**c. Business Purpose:**

The Business Practices will provide market participants with procedures for providing any necessary data for the Redirect of Transmission Service. The current WEQ OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as redirects, that use this resold or reassigned transmission usage to a constrained path.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**1. RECOMMENDED ACTION:**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
- Principle Definition
- Business Practice Standard Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
- Principle Definition
- Business Practice Standard Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:** This recommendation modifies the OASIS Business Practices to establish business practice standards related to the “redirection” of transmission service. These business practices address the provisions of Section 22 in the FERC Pro Forma Open Access Transmission Tariff related to the modification of Points of Receipt and/or Delivery for Firm Point-to-Point Transmission Service.

**RECOMMENDED STANDARDS:**

**Definitions to be added to the OASIS Business Practice standard**

**Capacity Available to Redirect** – the granted capacity of the Parent Reservation at the time of customer confirmation (CAPACITY\_GRANTED) less all confirmed reassignments (e.g., resales), confirmed redirects on a firm basis, confirmed redirects on a non-firm basis, displacements, and approved schedules.

**Parent Reservation** – ~~an~~ the original, existing, confirmed reservation being modified by a Transmission Customer’s request to redirect, reassign, resale, etc.





## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

Requesters: Electronic Scheduling Subcommittee and  
Information Technology Subcommittee

Request No.: R04006-C

Request Title: OASIS 1A Enhancements – Redirects

### **Business Practices to be added to the OASIS Business Practice standard**

#### **Standard 9. Requirements for dealing with Redirects on a Firm basis.**

**9.1** – The Transmission Customer (TC) shall have the right to request modifications to Points of Receipt and/or Points of Delivery (including source or sink, where required) on a firm basis for a Confirmed Point-to-Point Firm Transmission Service reservation (i.e., Parent Reservation)- providing the original path of the transaction is utilized for the Redirect. -This will be referred to as a Redirect on a Firm basis.

**9.1.1** – The TC may Redirect on a Firm basis any confirmed Firm Point-to-Point Parent Reservation regardless of the request type.

**9.1.2** - A request to Redirect on a Firm basis shall be submitted to the primary Transmission Provider with a request type of REDIRECT.

**9.1.3** - A request to Redirect on a Firm basis shall be queued and treated in the same manner as any other firm point to point request providing the original path of the transaction is maintained; and subject to the other requirements of this standard.

**9.1.4** - No additional deposit shall be required for a request to Redirect on a Firm basis.

**9.1.5** – The TC shall not submit a request for a Redirect on a Firm basis that exceeds the Capacity Available for Redirect.

**9.2** - The TC shall be allowed to request a Redirect on a Firm basis for a portion or all of the Capacity Available to Redirect, even if the transmission scheduling rights on the Parent Reservation have been limited due to outages or other reliability-related events. An example is shown in Appendix B. (Ed – I am of the opinion that the request should be allowed, but a refusal should also be allowed if the request will worsen the reliability condition. However, if a TP sold transmission on a firm basis the entity purchasing the transmission capacity should be able to use the capacity up to the limits provided by a firm reservation such that the TP may be required to shed firm load to load the schedule.



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and Information Technology Subcommittee

**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

I think the bottom line here is that the TP sold transmission capacity that they didn't have if they have to shed firm load to allow the transaction to go forward.)

**9.3** - The TC shall be allowed to request a Redirect on a Firm basis for a portion or all of the time period of the Parent Reservation (i.e., bound by the start/stop times of the Parent Reservation). An example is shown in Appendix B.

**9.3.1** – A request for Redirect on a Firm basis must be submitted, and is subject to all request timing requirements consistent with a reservation for Firm service of similar duration.

**9.3.2** - A request for Redirect on a Firm basis must represent an established Firm Point-to-Point Service Increment (e.g., Daily, Monthly, etc.) offered by the Transmission Provider.

**9.4** The TC's rights on the Parent Reservation shall remain unaffected during the Transmission Provider evaluation of the request to Redirect on a Firm basis.

**9.4.1** - If the request to Redirect on a Firm basis is denied for any reason, all rights and obligations shall remain per the Parent Reservation. An example is shown in Appendix B.

**9.4.2** - The TC shall be allowed to submit and have pending multiple requests for Redirects on a Firm basis up to and not exceeding the ~~against the same~~ Capacity Available to Redirect. The TP shall evaluate the requests for Redirects in the order they are received and will confirm only the requests up to and not exceeding the Capacity Available to Redirect. ~~The TP shall evaluate each such request with the knowledge that only those requests up to the Capacity Available to Redirect may ultimately be confirmed.~~ An example is shown in Appendix B.

**9.5** - Upon confirmation of the request or requests to Redirect on a Firm basis, the Capacity Available to Redirect shall be reduced by the amount of the total of the redirected capacity for the time period of that Redirect. An example is shown in Appendix B.



## **RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

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**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**9.5.1** – The TC shall not confirm any request to Redirect on a Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to block any such confirmation. An example is shown in Appendix B.

**9.5.2** – The TC shall withdraw any request to Redirect on a Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to withdraw their acceptance of any request to Redirect on a Firm basis that cannot be confirmed due to limitations in the Capacity Available to Redirect by setting the OASIS standard STATUS data element to the value of SUPERSEDED.

**9.5.3** – Redirects on a Firm basis shall have all the rights and obligations of an original reservation for Firm service (with the exception of renewal/roll-over rights), including the rights to be Redirected on a Firm and/or Non-Firm basis.

**9.6** - For the purposes of curtailment and other capacity reductions, confirmed Redirects on a Firm basis shall be treated comparably to all other types of Firm Point-to-Point Service.

**9.6.1** - Curtailments or other capacity reductions to the remaining portion of the reserved capacity on the Parent Reservation shall not affect the Redirect reservation.

**9.6.2** - Curtailments or other capacity reductions affecting the reserved capacity on the Redirect reservation shall not affect the Parent Reservation nor result in a reinstatement of capacity on the Parent Reservation.

**9.7** - Unless otherwise mutually agreed to by the primary provider and original customer, a request for Redirect on a Firm basis does not impact the TC's long term firm renewal rights (e.g., rollover or evergreen rights) on the original path, nor does it confer any renewal rights on the redirected path.



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and Information Technology Subcommittee

**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

**9.8** - Any differences in charges associated with the Redirect on a Firm basis will be settled in accordance with the Transmission Provider's tariff.

**9.8.1** - If not addressed in the Transmission Provider's tariff or in a Service Agreement, a credit on the Parent Reservation shall be computed as the total reservation charge divided by the total megawatt hours reserved times the megawatt hours redirected. The redirected reservation shall be charged as if it were a reservation with a request type of ORIGINAL.

### **Standard 10. Requirements for dealing with Redirects on a Non-Firm basis.**

**10.1** – The Transmission Customer (TC) shall have the right to request an alternate, or secondary, Point of Receipt and/or Point of Delivery (including source and sink, if required) on a non-firm basis for a Confirmed Point-to-Point Firm Transmission Service reservation (i.e., Parent Reservation). This will be referred to as a Redirect on a Non-Firm basis.

**10.1.1** – The TC may Redirect on a Non-Firm basis any confirmed Firm Point-to-Point Parent Reservation regardless of the request type.

**10.1.2** - A request to Redirect on a Non-Firm basis shall be submitted to the primary Transmission Provider with a request type of REDIRECT.

**10.1.3** - A request to Redirect on a Non-Firm basis shall be queued and treated in the same manner as any other non-firm point to point request, subject to the other requirements of this standard.

**10.1.4** - Redirects on a Non-Firm basis shall have a service priority that is lower than non-firm hourly point-to-point service.

**10.1.5** - Requests for Redirects on a Non-Firm basis shall specify the following transmission service attributes in their request:

TS\_CLASS=SECONDARY

TS\_TYPE=POINT\_TO\_POINT



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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TS\_PERIOD, TS\_WINDOW, and SERVICE\_INCREMENT shall specify any valid value offered by the TP for Non-Firm Point-to-Point service.

**10.1.6** – Requests for Redirects on a Non-Firm basis shall be submitted by the TC as pre-confirmed.

10.1.7 – The TC shall not submit a request for a Redirect on a non-Firm basis that exceeds the Capacity Available for Redirect.

**10.2** - The TC shall be allowed to request a Redirect on a Non-Firm basis for a portion or all of the Capacity Available to Redirect, even if the transmission scheduling rights on the Parent Reservation have been limited due to outages or other reliability-related events. An example is shown in Appendix B.

**10.3** - The TC shall be allowed to request a Redirect on a Non-Firm basis for a portion or all of the time period of the Parent Reservation (i.e., bound by the start/stop times of the Parent Reservation). An example is shown in Appendix B.

**10.3.1** – A request for Redirect on a Non-firm basis must be submitted, and is subject to all request timing requirements consistent with reservations for Non-Firm Point-to-Point service of similar duration.

**10.4** The TC's rights on the Parent Reservation shall remain unaffected during the Transmission Provider evaluation of the request to Redirect on a Non-Firm basis.

**10.4.1** - If the request to Redirect on a Non-Firm basis is denied for any reason, all rights and obligations shall remain per the Parent Reservation. An example is shown in Appendix B.

**10.4.2** - The TC shall be allowed to submit and have pending multiple requests for Redirects on a Non-Firm basis up to and not exceeding the against the same Capacity Available to Redirect. The TP shall evaluate the requests for Redirects in the order they are received and will confirm only the requests up to and not exceeding the Capacity Available to Redirect. ~~The TP shall evaluate each such~~



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

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**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

~~request with the knowledge that only those requests up to the Capacity Available to Redirect may ultimately be confirmed.~~ An example is shown in Appendix B.

**10.5** - Upon confirmation of the request to Redirect on a Non-Firm basis, the Capacity Available to Redirect shall be reduced by the amount of the redirected capacity for the time period of that Redirect. An example is shown in Appendix B.

**10.5.1** – The TC shall not confirm any request to Redirect on a Non-Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to block any such confirmation.

**10.5.2** – The TC shall withdraw any request to Redirect on a Non-Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to withdraw their acceptance of any request to Redirect on a Non-Firm basis that cannot be confirmed due to limitations in the Capacity Available to Redirect by setting the OASIS standard STATUS data element to the value of SUPERSEDED.

**10.5.3** – The TC shall have the right to request the TP to release capacity associated with a confirmed request to Redirect on a Non-Firm basis and reinstate that capacity to the Parent (Firm) Reservation. The TP shall honor all such requests, and reinstate the capacity on the Parent Reservation such that it may subsequently be scheduled, Redirected on a Firm or Non-Firm basis to a different path, resold, etc.

**10.6** - For the purposes of curtailment and other capacity reductions, confirmed Redirects on a Non-Firm basis shall be treated comparably to all other types of Non-Firm Secondary Point-to-Point Service.

**10.6.1** - Curtailments or other capacity reductions to the remaining portion of the reserved capacity on the Parent Reservation shall not affect the Redirect reservation.



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and  
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**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

**10.7** – Any differences in charges associated with a Redirect on a Non-Firm basis will be settled in accordance with the Transmission Provider's tariff.

**10.7.1** – Unless otherwise provided for in the TP's tariff, there shall be no charge to Redirect on a Non-Firm basis.

**10.8** - TPs shall have the right, but are in no means obligated, to accept requests for Redirect on a Non-Firm basis based on the submission of an Electronic Tag (ETAG) using protocols compliant with Version 1.7.095 NERC Transaction Information System Working Group (TISWG) *Electronic Tagging Functional Specification*.

**10.8.1** - The TC submitting a Redirect on a Non-Firm basis via a tag shall be subject to the same transaction timing requirements specified for submission of such requests directly on OASIS.

**10.8.2** - A TP accepting Redirects on a Non-Firm basis via ETAG shall allow a TC to request redirected service for one or more path segments of the tag by designating:

- (a) 1-NS as the transmission product code under the OASIS block,
- (b) the OASIS reservation identifier of the Firm Parent Reservation to be redirected, and
- (c) the secondary points of receipt and delivery being requested.

**10.8.3** - A TP accepting Redirects on a Non-Firm basis via ETAG shall determine the amount of the redirect request from:

- (a) The amount of the TP Product.
- (b) If the TP Product is not specified, the MW amount at the POR or POD for that TP in the Loss Table in accordance with the TP's tariff
- (c) , if neither TP Product amount nor Provider Loss Table amounts are specified, the MW amount in the Energy Profile.

**10.8.4** - A TP accepting Redirects on a Non-Firm basis via ETAG shall consider the ETAG as a pre-confirmed Redirect request on a Non-Firm basis that is to be processed on a comparable basis with all such requests made directly on



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

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**Request Title:** OASIS 1A Enhancements – Redirects

OASIS, with all obligations associated with such a request to be borne by the TC holding the Parent Reservation (e.g., any ancillary services, charges or credits for redirect, etc.), and subject to all other requirements of this Standard.

**10.8.5** - The OASIS queue time of a Redirect requested via ETAG shall be the TP's ETAG Approval Service receipt time, unless a system failure requires the use of backup procedures, in which case the OASIS queue time shall be the time the ETAG is received by the TP.

**10.8.6** - Once an ETAG designating 1-NS service becomes implemented, the TP shall consider the associated Redirect request(s) to be confirmed.

### Appendix B – Redirect Standards Examples

These examples need a lot of work. They do not clearly represent the principles described in 9 and 10 above. These examples would be clearer if they included the parent reservation prior to the redirect, the redirect, and then the effect of the redirect on the parent reservation. Sort of a before and after or cause and effect view.

#### Standard 9.2 and 10.2

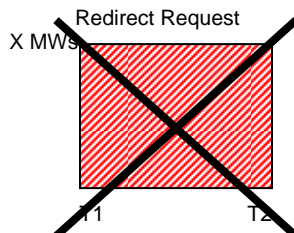
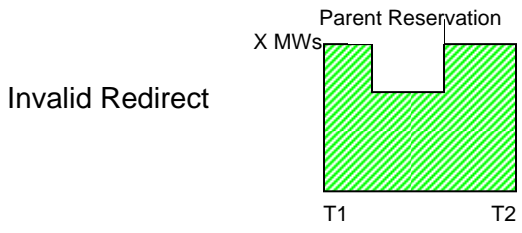
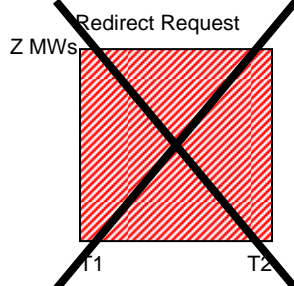
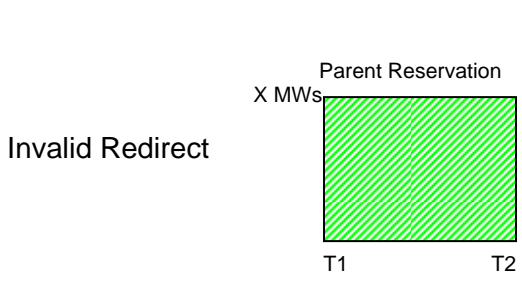
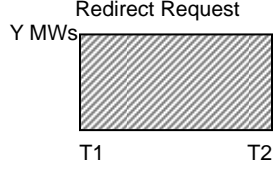
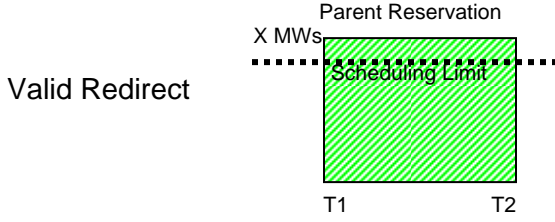
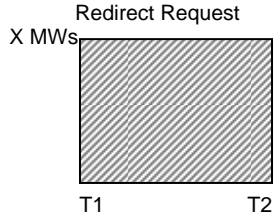
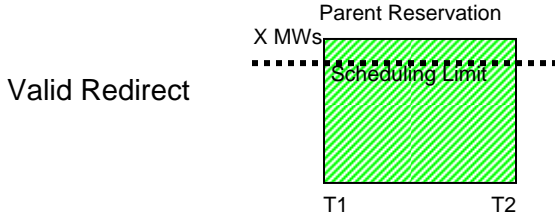
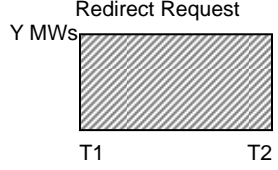
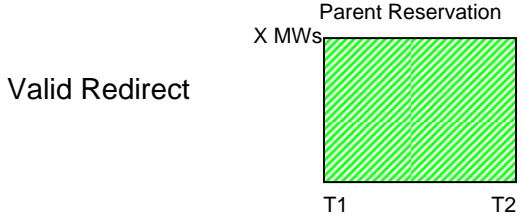
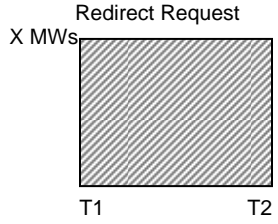
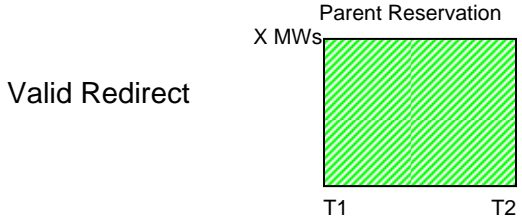
The Capacity requested for Redirects on a Firm or Non-Firm basis must be within the Capacity Available to Redirect of the Parent Reservation.





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Electronic Scheduling Subcommittee and  
Information Technology Subcommittee  
**Request No.:** R04006-C  
**Request Title:** OASIS 1A Enhancements – Redirects





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and  
Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Standard 9.3 and 10.3**

The Start/Stop times requested for Redirects on a Firm or Non-Firm basis must be within the Start/Stop times of the Parent Reservation.

Valid Redirect

Valid Redirect

Invalid Redirect

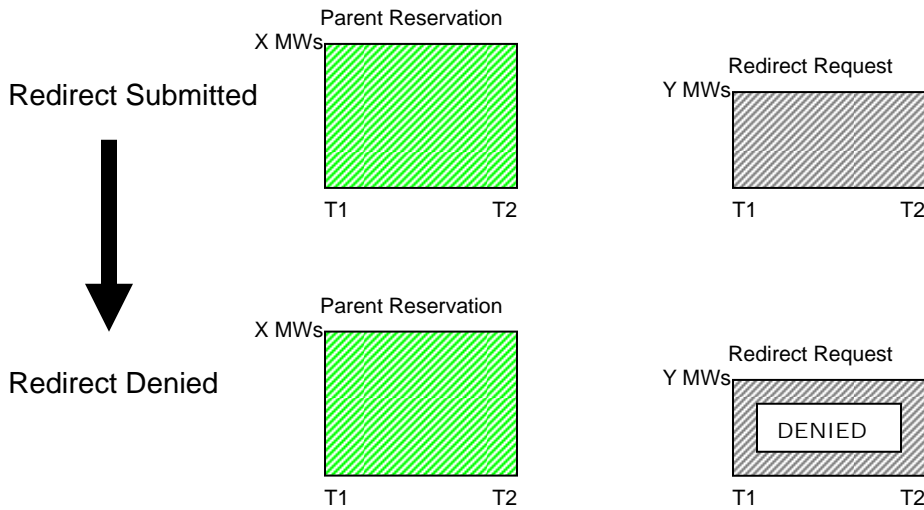


**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Electronic Scheduling Subcommittee and Information Technology Subcommittee  
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**Standard 9.4.1 and 10.4.1**

Capacity Available to Redirect on the Parent Reservation is not impacted by a denied request for Redirect on a Firm or Non-Firm basis.





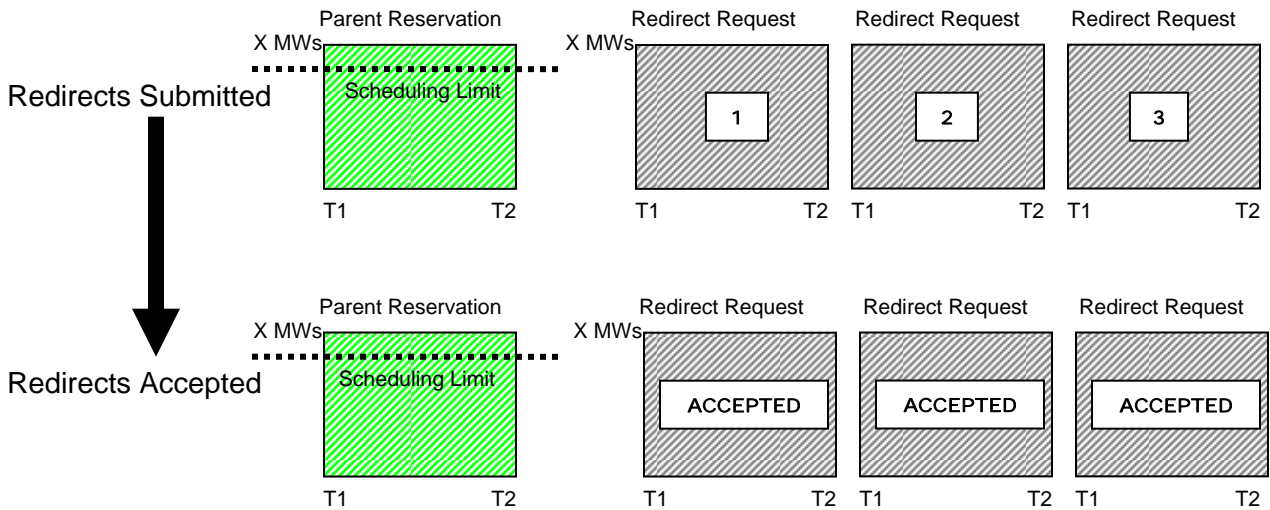
**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and Information Technology Subcommittee**  
**Request No.: R04006-C**  
**Request Title: OASIS 1A Enhancements – Redirects**

**Standard 9.4.2 and 10.4.2**

Multiple requests for Redirect on a Firm or Non-Firm basis may be submitted for the same Capacity Available to Redirect on the Parent Reservation.



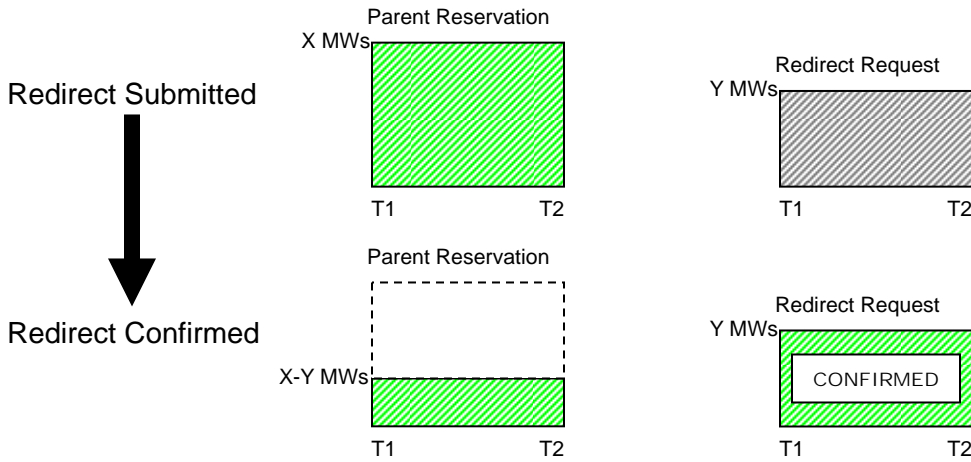


**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Electronic Scheduling Subcommittee and Information Technology Subcommittee  
**Request No.:** R04006-C  
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**Standard 9.5 and 10.5**

Confirmation of requests for Redirect on a Firm or Non-Firm basis reduces the Capacity Available to Redirect on the Parent Reservation.





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

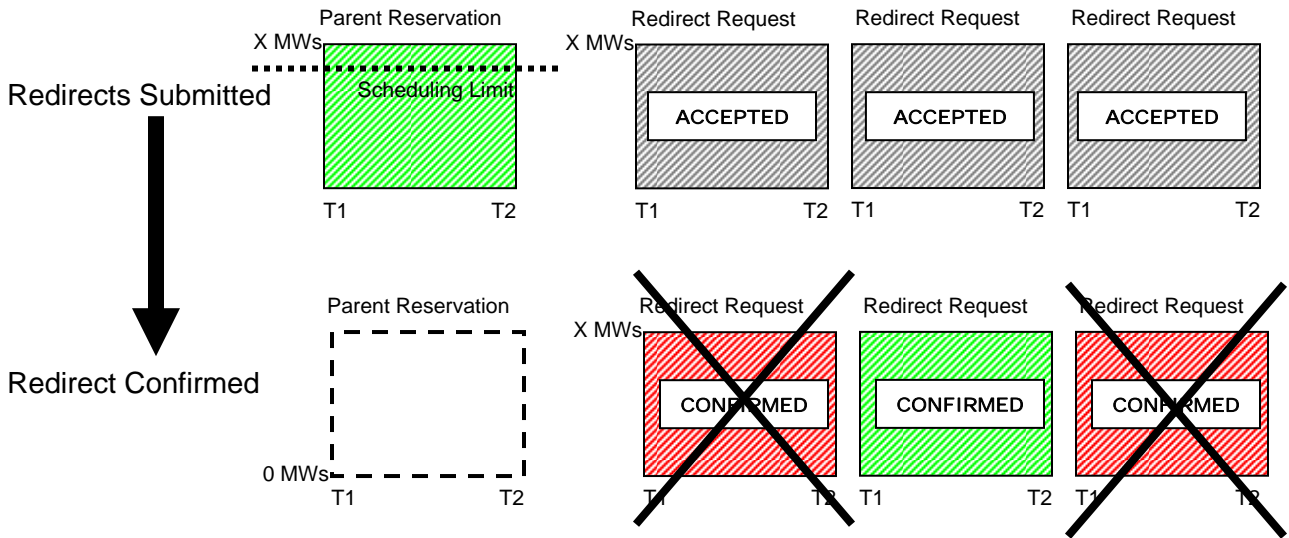
**Requesters: Electronic Scheduling Subcommittee and Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Standard 9.5.1 and 10.5.1**

Confirmation of requests for Redirect on a Firm or Non-Firm basis that exceed the remaining Capacity Available to Redirect on the Parent Reservation will be blocked.





## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and  
Information Technology Subcommittee

**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

### 4. SUPPORTING DOCUMENTATION

#### a. Description of Request:

Using OASIS to process and record redirects of transmission service is a difficult task. There are many issues related to the redirect and resale functionality, but most are caused by provider business rules or vendor design choices. The primary issue concerns redirects of transmission service. The current OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold (reassigned) transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as REDIRECTS, that use this resold or reassigned transmission service. This is only an issue when the 2nd customer wants to redirect transmission usage to a constrained path. Currently, unless the provider intervenes on the backend, that provider only has the option to deny this type of transaction when it is tagged.

#### b. Description of Recommendation:

The standard recommendation addresses the “primary issue” stated in the Standard Request: the business practices related to requests for a Redirect of transmission service on either a Firm or Non-Firm basis. The issue of the treatment of secondary market resale requests for redirected service are addressed in a separate Standard Recommendation specific to Resales.

The OASIS S&CP discusses redirection of service to alternate points of receipt and delivery in Section 4.2.13.9. This section did not explicitly state to whom such requests must be submitted. Redirected service requires an assessment of the transfer capability on the designated alternate points of receipt and/or delivery. Only the primary transmission provider is in a position to make such an assessment and authorize the redirected service under the OATT. Therefore, the OASIS S&CP is clarified in the recommended standard to explicitly require that all requests for redirected service must be submitted to the primary transmission provider for evaluation and approval. The recommended standard also addresses the settlement issue in the event that redirected service would increase or decrease the charges due to the transmission provider.

In support of the Recommendation Redirect of Transmission Service for a proposed business practice standard to the NAESB Executive Committee, please see the following sets of minutes:

WEQ OASIS 1A Task Force	February 13, 2004	<a href="http://www.naesb.org/pdf/weq_oasis1a_021304dm.pdf">http://www.naesb.org/pdf/weq_oasis1a_021304dm.pdf</a>
	July 14, 2004	<a href="http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc">http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc</a>
WEQ ESS	February 17-18, 2004	<a href="http://www.naesb.org/pdf/weq_ess021704fm.doc">http://www.naesb.org/pdf/weq_ess021704fm.doc</a>
WEQ ESS/ ITS	April 6, 2004	<a href="http://www.naesb.org/pdf/weq_ess_its040604fm.doc">http://www.naesb.org/pdf/weq_ess_its040604fm.doc</a>
	May 26-27, 2004	<a href="http://www.naesb.org/pdf/weq_ess_its052604dm.doc">http://www.naesb.org/pdf/weq_ess_its052604dm.doc</a>
	July 28-29, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its072804fm.doc">http://www.gisb.org/pdf/weq_ess_its072804fm.doc</a>



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and  
Information Technology Subcommittee  
**Request No.:** R04006-C  
**Request Title:** OASIS 1A Enhancements – Redirects

August 17, 2004 [http://www.gisb.org/pdf/weq\\_ess\\_its081704fm.doc](http://www.gisb.org/pdf/weq_ess_its081704fm.doc)  
September 2, 2004 [http://www.gisb.org/pdf/weq\\_ess\\_its090204fm.doc](http://www.gisb.org/pdf/weq_ess_its090204fm.doc)  
September 29-30,  
2004 [http://www.gisb.org/pdf/weq\\_ess\\_its092904dm.doc](http://www.gisb.org/pdf/weq_ess_its092904dm.doc)  
October 6, 2004  
October 8, 2004

### **c. Business Purpose:**

The Business Practices will provide market participants with procedures for providing any necessary data for the Redirect of Transmission Service. The current WEQ OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as redirects, that use this resold or reassigned transmission usage to a constrained path.

### **d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**



## Redirects and Multiple Submissions

- 1) Standard 8, Section 8.3.2 references a time limitation imposed by the Transmission Provider in the event of Queue Hoarding. This restriction states "...in no event shall the TP impose such restrictions that would set the confirmation time limit to expire any earlier than 30 minutes before the pro forma scheduling deadline." This restriction puts an undue burden on the TP's and the TC's to approve and accept the rest of the queued reservations within only a 30 minute window. The Business Practice Standards for OASIS Transactions (Order 638), Standard 4.13 already specifies timing requirements for OASIS requests. Specifically in that standard, Table 4-2 Footnote 2 states "Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override preexemption deadlines." This footnote already allows the TP to set the TC response deadlines to accommodate multiple reservation requests and yet minimize the impacts on scheduling deadlines due to queue hoarding. Therefore, the Southern Company transmission organization ("Southern Company Transmission") recommends that the EC delete this confirmation time limit restriction (i.e., the last sentence in Section 8.3.2) from the standard.
- 2) Standard 9, Section 9.8.1 references a calculation for a default charge on a firm redirect and a default credit on the Parent Reservation, "if not addressed in the Transmission Provider's tariff". All tariff rate calculations are submitted by each Transmission Provider to FERC for approval and should not be addressed here. Southern Company Transmission suggests that the EC delete this section (9.8.1) in its entirety.
- 3) Standard 10, Section 10.1.5 needs to be reworded. As presently worded, the standard seems to imply that Transmission Providers might have to offer additional service increments of Secondary Point-to-Point service. Southern Company Transmission suggests that the EC revise the wording "...offered by the TP for Non-Firm Point-to-Point service." to "...offered by the TP for Non-Firm **Secondary** Point-to-Point service." (emphasis added).
- 4) Standard 10, Section 10.5.3 references a "release" mechanism for Redirect on a Non-Firm basis. This proposed release mechanism has not yet been developed in support of this standard. Given the potential design complications that will likely arise in retrofitting a "release" mechanism into existing OASIS applications, as well as the likelihood of further automation requirements for verification of redirect capacity available on the Parent Reservation, Southern Company Transmission suggests that the EC consider a 6 months time frame for implementation of Standard 10. Some reasonable implementation period is necessary for an orderly transition which allows a Transmission Provider to remain in compliance with all applicable standards at any point in time.

5) Standard 10, Section 10.5.3 needs additional clarification, with respect to the rights and obligations of the TC and TP concerning a request for “release” of a confirmed non-firm redirect reservation. Some redundant wording can also be eliminated, in regard to the future use of the re-instated capacity on the Parent Reservation. Southern Company Transmission suggests that Section 10.5.3 be revised as follows:

**10.5.3** – The TC shall have the right to request the TP to release unscheduled capacity associated with a confirmed request to Redirect on a Non-Firm basis and reinstate that capacity to the Parent (Firm) Reservation. The TP shall honor all valid requests for release, and reinstate the released capacity to the Parent Reservation.

Comments Submitted by: Barb Kedrowski  
We Energies

Dated: 11/11/04, 1:21 PM

Below are We Energies' comments on the WEQ 2004 Annual Plan Item 2 - OASIS 1A Enhancements - Redirects (Comments in red, text from standard in blue):

**Standard 10 - Requirements for dealing with Redirects on a non-firm basis:**

Section 10.1.6 - Requests for redirects on a non-firm basis shall be submitted by the TC as pre-confirmed.

**We Energies' comment:** Why must it be preconfirmed? Would it be possible to set an acceptable time interval for redirect request confirmation that would allow requests to be submitted without being preconfirmed? Sometimes deals are done that encompass more than one transmission provider. If TLR's are in effect on one TP's jurisdiction, the deal falls apart. If the redirect request is preconfirmed and it has been confirmed by the TP, it is no longer of any use since one segment of the deal can't flow.

Section 10.5.1 - The TC shall not confirm any request to Redirect on a non-firm basis that would exceed the Capacity Available to Redirect at that point in time. The TP shall have the right to block any such confirmation.

**We Energies' comment:** If the TC can submit multiple redirect requests that are over the level of the parent request, how does the TC know if they have excluded the capacity available to redirect if the TP is evaluating multiple requests?

Sections 10.1.6 and 10.5.1

**We Energies comment:** When looking at these sections together, if a TC must pre-confirm a request and can have multiple competing redirect requests that are being evaluated, when the TC "accepts" a request it will automatically be confirmed in violation of 10.5.1. This then raises the question on how the TC would notify the TP which competing redirect request has priority if more than one are deemed Ok. If the requirement for pre-confirmation is removed, then the TC would be able to determine which request they would prefer to confirm.

Section 4.b Description of Recommendation (Supporting Documentation)

**We Energies' comment:** Use of the word "an" instead of the word "and" in the sentence: "Only the primary transmission provider is in a position to make such an assessment and authorize the redirected service under the OATT."

Thanks,

Barb Kedrowski  
Project Manager  
We Energies



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and  
Information Technology Subcommittee  
**Request No.:** R04006-B  
**Request Title:** OASIS 1A Enhancements – Multiple Requests

### 1. RECOMMENDED ACTION:

Accept as requested  
 Accept as modified below  
 Decline

### EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

Change to Existing Practice  
 Status Quo

### 2. TYPE OF DEVELOPMENT/MAINTENANCE

#### Per Request:

Initiation  
 Modification  
 Interpretation  
 Withdrawal  
  
 Principle  
 Definition  
 Business Practice Standard  
 Document  
 Data Element  
 Code Value  
 X12 Implementation Guide  
 Business Process Documentation

#### Per Recommendation:

Initiation  
 Modification  
 Interpretation  
 Withdrawal  
  
 Principle  
 Definition  
 Business Practice Standard  
 Document  
 Data Element  
 Code Value  
 X12 Implementation Guide  
 Business Process Documentation

### 3. RECOMMENDATION

**SUMMARY:** This recommendation modifies the OASIS Business Practices in order to provide a mechanism by which transmission providers can mitigate problems associated with Denial of Service attacks or grossly inefficient use of OASIS. The particular cases addressed by this standard are,

- Denial of Service,
- Queue Flooding, and
- Queue Hoarding.

In addition this recommendation suggests consolidation of all definitions from 1.3 and new definitions from this recommendation into a separate section preceding the OASIS



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: Wholesale Electric Quadrant

**Requesters:** Electronic Scheduling Subcommittee and Information Technology Subcommittee  
**Request No.:** R04006-B  
**Request Title:** OASIS 1A Enhancements – Multiple Requests

Business Practices. All content is removed from section 1.3 and is reserved for future use.

### RECOMMENDED STANDARDS:

The following definitions section is to be added to the OASIS Business Practices. It shall consist of definitions previously in Requirement 1.3 and new definitions resulting from the business practices proposed in this recommendation. The new definitions are underlined.

**Definitions** – the following definitions are applicable to the OASIS Business Practices:

#### **Affiliate-**

(1) For any exempt wholesale generator, as defined under section 32(a) of the Public Utility Holding Company Act of 1935, as amended, the same as provided in section 214 of the Federal Power Act; and

(2) For any other entity, the term affiliate has the same meaning as given in 18 CFR 161.2(a).

**Commission** - the Federal Energy Regulatory Commission.

**Denial of Service** – the act of this is the intentionally or unintentionally degradation of OASIS performance that denying service to other OASIS customers impacts all customer interactions with OASIS by consuming OASIS cyber resources in such a way that OASIS performance is degraded and the market's ability to operate is impeded. (The name didn't fit the definition.)

**Identical Service Requests** – “identical service requests” are those OASIS transmission service requests that have exactly the same values for the following OASIS template Data Elements:

- CUSTOMER\_CODE
- CUSTOMER\_DUNS
- SERVICE\_INCREMENT
- TS\_CLASS
- START\_TIME
- STOP\_TIME
- POR\*
- POD\*
- PATH\*

\* Service requests where any combination of PATH, POR and/or POD represent exactly the same commercial transmission elements shall be considered as “having the exact same value.”

**Queue Flooding** – excessive submission of identical service requests.



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**Queue Hoarding** – this is the act, intentionally or unintentionally, of not confirming or withdrawing an accepted service request within the time limit specified by the e-tag rules, such that it impacts the ability of other willing buyers to secure service in a timely fashion.

**Responsible party** - the Transmission Provider or an agent to whom the Transmission Provider has delegated the responsibility of meeting any of the requirements of this part.

**Reseller** - any Transmission Customer who offers to sell transmission capacity it has purchased.

**Transmission Provider** - any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.

**Transmission Customer** - any eligible customer (or its designated agent) that can or does execute a transmission service agreement or can or does receive transmission service.

**Wholesale merchant function** - the sale for resale of electric energy in interstate commerce.

The following changes are made to the OASIS Business Practices.

### **Standard 1.3 Reserved**

The following requirements are added to the OASIS Business Practices.

### **Standard 8. Requirements for dealing with multiple, identical transmission service requests.**

**8.1 Denial of Service** - OASIS system administrators or Transmission Providers shall have the right to institute programs for the detection and mitigation of Denial of Service (DoS) attacks based on recognized standard industry practices. (the word attacks here implies an intentional event while the definition states a cause can be unintentional)

**8.1.1** OASIS system administrators or Transmission Providers shall have the right to block a user's large volume or high frequency submission of transmission service requests that are syntactically invalid and/or do not constitute a valid, legitimate request for service under the terms of the Transmission Provider's tariff (i.e., cannot be queued by OASIS for evaluation by the Transmission Provider) pursuant to the provisions in NAESB OASIS Business Practice Standard 1.5(d).



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8.1.2 The Transmission Provider will have the right to suspend the user's access to the OASIS system when it is determined that the user has caused two or more DoS events.

8.1.3 The user's access to OASIS will be reinstated when they can demonstrate the problem that caused the DoS events has been corrected.

**8.2 Queue Flooding** - OASIS system administrators or Transmission Providers shall have the right to invalidate the submission of additional **identical service requests** by a given Transmission Customer when the sum of the capacity requested in all preceding, pending, valid **identical service requests** for that Transmission Customer equals or exceeds the impacted transmission facilities' Total Transfer Capability at any point in time over the duration of such requests.

8.2.1 The Transmission Provider will have the right to suspend the user's access to the OASIS system when it is determined that the user has caused two or more Queue Flooding events.

8.2.2 The user's access to OASIS will be reinstated when they can demonstrate the problem that caused the Queue Flooding events has been corrected.

**8.3 Queue Hoarding** - OASIS system administrators or Transmission Providers shall have the right to institute processes and procedures to limit the ability of a given Transmission Customer to delay the timely processing of transmission requests submitted by other Transmission Customers.

**8.3.1** When transmission service requests are queued for a limited transmission facility(ies) such that the Transmission Provider must wait for a given Transmission Customer to act on an accepted request for service prior to accepting or denying subsequent requests for service, the Transmission Provider shall have the right to deny and remove from consideration all subsequent **identical service requests** submitted by the same Transmission Customer should that Transmission Customer explicitly (i.e., withdraws their request) or implicitly (i.e., fails to confirm the request within the confirmation time limit) elect not to take service over the limited facility(ies).

**8.3.2** Transmission Providers shall have the right to restrict the Customer Confirmation Time Limit, as established in Standard 4.13, in the event the confirmation time limit would extend beyond the Provider's established scheduling deadline. But in no event shall the TP impose such restrictions that



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**

**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and  
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**Request No.: R04006-B**

**Request Title: OASIS 1A Enhancements – Multiple Requests**

would set the confirmation time limit to expire any earlier than 30 minutes before the pro forma scheduling deadline.

8.3.3 The Transmission Provider will have the right to suspend the user's access to the OASIS system when it is determined that the user has caused two or more Queue Hoarding events.

8.3.4 The user's access to OASIS will be reinstated when they can demonstrate the problem that caused the Queue Hoarding events has been corrected.





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
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**Appendix – Standard 8 Examples**

8.3 Queue Hoarding

The following example assumes that the Transmission Provider made an assessment of their Firm ATC on path IN-OUT in response to ABC's submission of a reservation request at 08:12:01. The TP determined the Firm ATC to be 30 MW for 8/5/2004, which is sufficient to satisfy the first queued request. Following this evaluation, the TP accepts the first queued request from ABC at 11:30. The TP delays acting on the next request from LMN since whether it is counteroffered with "interim partial service" or accepted in total until the disposition of ABC's request is determined. For this example, the TPs reservation queue at 11:30 on 8/2/2004 is shown in the following table.

CUSTOMER_CODE	CUSTOMER_DUNS	SERVICE_INCREMENT	TS_CLASS	START_TIME	STOP_TIME	POR	POD	PATH	MW	STATUS	QUEUE_TIME
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	20	ACCEPTED	2004-08-02 08:12:01CS
LMN	567890123	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	15	QUEUED	2004-08-02 08:23:10CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	QUEUED	2004-08-02 08:45:06CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	QUEUED	2004-08-02 09:00:33CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	QUEUED	2004-08-02 10:01:16CS
XYZ	987654321	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	5	QUEUED	2004-08-02 10:57:41CS
LMN	567890123	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	15	QUEUED	2004-08-02 08:23:10CS



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The Standard Customer Confirmation Time Limit for ABC is 24 hours, and the TP may retract their acceptance of ABC's request on expiration of this confirmation time limit. Standard Requirement 8.3.2 also gives the TP the right to remove from consideration (deny using STATUS of INVALID) all **identical service requests** from ABC should ABC elect to not confirm their first accepted request. Assuming ABC takes no action on their first accepted request, the following table shows the results of exercising Requirement 8.3.2. To prevent the subsequent requests from ABC delaying the TP acting on other Customer requests from LMN and XYZ for another 24 hour confirmation time limit, the TP removes ABC's requests from the queue since they already had the option to purchase 20 MWs of capacity and elected not to do so. The first LMN and XYZ requests are accepted, but again the second LMN request cannot be acted upon until the disposition of these two accepted requests is determined.

CUSTOMER_CODE	CUSTOMER_DUNS	SERVICE_INCREMENT	TS_CLASS	START_TIME	STOP_TIME	POR	POD	PATH	MW	STATUS	QUEUE_TIME
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	20	RETRACTED	2004-08-02 08:12:01CS
LMN	567890123	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	15	ACCEPTED	2004-08-02 08:23:10CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	INVALID	2004-08-02 08:45:06CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	INVALID	2004-08-02 09:00:33CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	INVALID	2004-08-02 10:01:16CS
XYZ	987654321	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	5	ACCEPTED	2004-08-02 10:57:41CS
LMN	567890123	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	15	QUEUED	2004-08-02 08:23:10CS



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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### 4. SUPPORTING DOCUMENTATION

#### a. Description of Request:

##### **Multiple Submissions of Identical Transmission Requests / Queuing Issues**

OASIS business rules are very similar across most providers. In general, customers submitting transmission request have time periods when they can “queue” their requests. This queue process and the way it relates to the Internet can create issues when customers are “battling” for ATC on constrained interfaces. Many customers have automated the submission of transmission requests. In order to ensure their place in the queue, these customers schedule these requests to be submitted as a scheduled event. To account for delays caused by the Internet and the nature of web server systems, customers usually submit multiple copies of the same request beginning a few minutes before the top of the hour and lasting until well after the top of the hour. The issues created by duplicate request submittal are fairly straightforward. Backend systems and the operators working those systems are impacted dramatically. Each request that arrives after the top of the hour is a valid request. Therefore, the provider can have hundreds of requests in the queue that will never be confirmed. Other issues that are created are related to OASIS performance. Anyone using transstatus to retrieve a list of OASIS requests submitted during a time period similar to the one described above can receive hundreds of bogus requests and only a hand full of legitimate requests. Also, while the systems are busy working on the bogus requests, valid requests can be delayed due to bottlenecks created by this issue.

#### b. Description of Recommendation:

The standards recommended are intended to address three basic issues that have been noted in the operation of OASIS:

- Denial of Service – this is the intentional or unintentional degradation of OASIS performance that impacts all customer interactions with OASIS either through the flooding of the OASIS network connection with messages (OASIS specific or not), or excessive or grossly inefficient queries for, or submission of, data to OASIS.
- Queue Flooding – this is the excessive submission of specific transmission service requests, intentionally or unintentionally, in an attempt to hit a window in service availability and gain priority based on OASIS queued time.
- Queue Hoarding – this is the act, intentionally or unintentionally, of delaying a decision to confirm or withdraw an accepted service request such that it impacts the ability of other willing buyers to secure service in a timely fashion.

The Denial of Service standard recommendation establishes how an OASIS system administrator should deal with perceived DoS attacks. Specifically, it allows the administrator to use industry recognized processes and procedures to detect a pattern consistent with a DoS attack and take mitigating action. True DoS attacks are not necessarily targeted at simply compromising an OASIS system, and are typically implemented in network communications devices (e.g., routers, firewalls, etc.). Procedures relative to perceived DoS type of performance impacts specifically related to OASIS messaging are to be implemented in compliance with FERC Order 605.



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The Queue Flooding standard attempts to establish a minimum standard by which an OASIS system would screen multiple requests to limit the total number of transmission service reservations queued by any one given Transmission Customer. The criteria to which the OASIS may limit such requests (TTC) is intentionally conservative until operational experience dictates that there is a sufficient, documented operational problem that warrants being more restrictive.

The Queue Hoarding standard attempts to provide some mitigation of operational concerns that were originally addressed by the MIC in Docket No. RM95-9-013. The standard does not convey any preference to pre-confirmed service requests, nor limit any Transmission Customer from exercising their full rights to the confirmation time limits imposed by FERC Order 638. Instead, it specifies that once a Customer explicitly (by setting request status to WITHDRAWN) or implicitly (by allowing request status to be set to RETRACTED) declines to purchase service offered by the Transmission Provider, they forfeit all rights to purchase identical service requested in subsequently queued reservations. The Customer, in these cases, has opted to not purchase the service offered, which raises the question whether they truly intend to purchase service at all. These Customers may be intentionally “hoarding” transmission capacity by exercising their priority in the queue and customer confirmation time limit rights to block other willing buyers from purchasing transmission service.

Finally, recommendations to supplement FERC Order 638 Business Practice Standard 4.13 are proposed to eliminate the possibility for a single transmission service request to block all subsequent service requests until after the Firm and Non-Firm scheduling deadlines as specified in the Pro Forma Tariff (e.g., 10:00am and 2:00pm of day prior to service respectively. Note that there was not consensus within the OASIS 1A Task Force as to whether to propose modifications to the existing Order 638 Timing Standards. The recommendation therefore presents several alternatives for consideration as Standard Z.2:

- Silence - existing Order 638 standards are sufficient to address the concerns,
- Reinforcement of TP right to institute timing requirements such that confirmation time limits do not extend scheduling deadlines,
- Recommended confirmation time limit changes in fixed steps based on time prior to start of service to eliminate the possibility for a single transmission service request to block all subsequent service requests, or
- Recommended confirmation time limit changes on a sliding time frame based on time prior to start of service to eliminate the possibility for a single transmission service request to block all subsequent service requests.

In support of the Recommendation Multiple Requests to the NAESB Executive Committee for a proposed business practice standard, please see the following sets of minutes.

WEQ OASIS 1A Task Force	February 13, 2004	<a href="http://www.gisb.org/pdf/weq_oasis1a_021304fm.doc">http://www.gisb.org/pdf/weq_oasis1a_021304fm.doc</a>
	July 14, 2004	<a href="http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc">http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc</a>
WEQ ESS/ITS	December 15-16, 2003	<a href="http://www.gisb.org/pdf/weq_ess121503fm.pdf">http://www.gisb.org/pdf/weq_ess121503fm.pdf</a>
	January 8, 2004	<a href="http://www.gisb.org/pdf/weq_ess010804fm.pdf">http://www.gisb.org/pdf/weq_ess010804fm.pdf</a>
	February 17-18, 2004	<a href="http://www.gisb.org/pdf/weq_ess021704fm.doc">http://www.gisb.org/pdf/weq_ess021704fm.doc</a>



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April 6, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its040604fm.doc">http://www.gisb.org/pdf/weq_ess_its040604fm.doc</a>
May 26-27, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its052604fm.doc">http://www.gisb.org/pdf/weq_ess_its052604fm.doc</a>
July 28-29, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its072804fm.doc">http://www.gisb.org/pdf/weq_ess_its072804fm.doc</a>
August 17, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its081704fm.doc">http://www.gisb.org/pdf/weq_ess_its081704fm.doc</a>
September 2, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its090204fm.doc">http://www.gisb.org/pdf/weq_ess_its090204fm.doc</a>
September 29-30, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its092904dm.doc">http://www.gisb.org/pdf/weq_ess_its092904dm.doc</a>

### c. Business Purpose:

The recommended standards are intended to establish clear processes and procedures to be taken in OASIS to address operational concerns of the Industry.

### d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

The recommended standards are intended to address OASIS operational concerns that have been, at least in part, attempted to be addressed in prior FERC filings and orders. FERC issued Order 605 (Docket No. RM98-3-000) in May 1999 to specifically deal with the issue of automated access to OASIS and the performance impacts of excessive or grossly inefficient queries for information. The NERC Market Interface Committee, in response to numerous concerns over the queuing of multiple transmission service requests and the impact on OASIS operations, filed a proposed standard to address this issue in Docket No. RM95-9-013. This filing was subsequently denied by the Commission, principally due to:

- No Industry filing of comments in support of the standard
- Language in the standard that allowed application of the standard to be discretionary and therefore difficult to monitor/police (i.e., "...the transmission provider has the right to move to a retracted status...").
- Failure of the standard to address whether change to Transmission Provider response times are necessary, thereby circumventing the need for the standard.

The Subcommittee believes the language in FERC Order 605, and companion business practices standards related to Transmission Provider response and Transmission Customer confirmation time limits in FERC Order 638 (Docket No. RM95-9-003) establish clear guidance with respect to the specific issues they address. The recommended standards are intended to clarify and establish additional business practices with respect to three operational issues: Denial of Service, Queue Flooding, and Queue Hoarding.

The Denial of Service recommendation would allow the OASIS system administrators to use industry standard practices for the detection and mitigation of Denial of Service attacks whether they be due to flooding of a network connection with OASIS specific connection requests or not. The Subcommittee believes the existing provisions in Order 605 establish sufficient guidelines and protections for OASIS administrators to take action against excessive or grossly inefficient means of accessing OASIS data.

The Queue Flooding recommendation establishes a standard for OASIS to automatically limit the submission of excessive transmission service requests by a given Transmission Customer, or



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remove such requests from the queue of pending requests. The standard establishes the limit based on the Total Transfer Capability of the transmission system requested (based on path, POR and/or POD). TTC rather than Available Transfer Capability (ATC) was used as the criteria because of the possibility that preceding requests, or changes in system conditions between the time the request is queued and finally evaluated may actually increase the ATC to a level sufficient to support the service requested.

The Queue Hoarding recommendation establishes a standard by which the OASIS would purge the queue of pending, like requests from a given Transmission Customer, if that Customer explicitly or implicitly fails to purchase service offered by the the Transmission Provider, and is therefore preventing other willing buyers from acquiring service in a timely manner. This standard would prevent the submission of multiple frivolous service requests that the Customer has no intention of acting upon.

As a companion to the Queue Hoarding recommendation, the subcommittee is recommending a supplement to the Order 638 Business Practice Standard 4.13 to ensure that the time from a reservation being queued, provider evaluation, and customer confirmation time limit would not encroach on the day-ahead Firm and Non-firm scheduling deadlines in the Pro Forma tariff. Without the suggested changes, there is still the possibility for a single customer's transmission service request to block other customer requests until after the scheduling deadline. This is another example of "queue hoarding" that needed to be addressed by the industry.

**NAESB WEQ RECOMMENDATION R04006-B**

**OASIS 1A ENHANCEMENTS – MULTIPLE REQUESTS**

**HYDRO-QUÉBEC TRANSÉNERGIE COMMENTS**

**November 5, 2004**

The term "Commission" is defined as "the Federal Energy Regulatory Commission" and it is used only in "4. SUPPORTING DOCUMENTATION", Section d. Since the NAESB Standards should have an international intent, we propose to remove this definition and replace "Commission" by FERC (as is done elsewhere in the document) in this Section d.

Our comments on the definition of "Transmission Provider" stated for Recommendation R04005 also apply: A Transmission Provider is not necessarily a "public utility". The definition should be broadened to include all possibilities and specify that it is used for those who provide Open Access to their electric Transmission System. As written the definition seems to encompass even systems which do not offer such access. The term "interstate" is also limiting regarding the international nature of a Business Standard. We also question that a Transmission Provider is not necessarily operating "interstate" even in the U.S. As a first try, the resulting definition for Transmission Provider could then read: "An entity that owns, operates or control facilities used for the transmission of electric energy and that offers open access transmission service over those facilities".

Remove the "Responsible party", "Reseller" and "Wholesale merchant function" definitions as those terms are not used in the document.

Submitted by Victor Bissonnette  
Délégué commercial  
Direction Commercialisation  
Hydro-Québec TransÉnergie

## Redirects and Multiple Submissions

1) Standard 8, Section 8.3.2 references a time limitation imposed by the Transmission Provider in the event of Queue Hoarding. This restriction states "...in no event shall the TP impose such restrictions that would set the confirmation time limit to expire any earlier than 30 minutes before the pro forma scheduling deadline." This restriction puts an undue burden on the TP's and the TC's to approve and accept the rest of the queued reservations within only a 30 minute window. The Business Practice Standards for OASIS Transactions (Order 638), Standard 4.13 already specifies timing requirements for OASIS requests. Specifically in that standard, Table 4-2 Footnote 2 states "Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override preemption deadlines." This footnote already allows the TP to set the TC response deadlines to accommodate multiple reservation requests and yet minimize the impacts on scheduling deadlines due to queue hoarding. Therefore, the Southern Company transmission organization ("Southern Company Transmission") recommends that the EC delete this confirmation time limit restriction (i.e., the last sentence in Section 8.3.2) from the standard.

2) Standard 9, Section 9.8.1 references a calculation for a default charge on a firm redirect and a default credit on the Parent Reservation, "if not addressed in the Transmission Provider's tariff". All tariff rate calculations are submitted by each Transmission Provider to FERC for approval and should not be addressed here. Southern Company Transmission suggests that the EC delete this section (9.8.1) in its entirety.

3) Standard 10, Section 10.1.5 needs to be reworded. As presently worded, the standard seems to imply that Transmission Providers might have to offer additional service increments of Secondary Point-to-Point service. Southern Company Transmission suggests that the EC revise the wording "...offered by the TP for Non-Firm Point-to-Point service." to "...offered by the TP for Non-Firm **Secondary** Point-to-Point service." (emphasis added).

4) Standard 10, Section 10.5.3 references a "release" mechanism for Redirect on a Non-Firm basis. This proposed release mechanism has not yet been developed in support of this standard. Given the potential design complications that will likely arise in retrofitting a "release" mechanism into existing OASIS applications, as well as the likelihood of further automation requirements for verification of redirect capacity available on the Parent Reservation, Southern Company Transmission suggests that the EC consider a 6 months time frame for implementation of Standard 10. Some reasonable implementation period is necessary for an orderly transition which allows a Transmission Provider to remain in compliance with all applicable standards at any point in time.

5) Standard 10, Section 10.5.3 needs additional clarification, with respect to the rights and obligations of the TC and TP concerning a request for "release" of a confirmed non-



firm redirect reservation. Some redundant wording can also be eliminated, in regard to the future use of the re-instated capacity on the Parent Reservation. Southern Company Transmission suggests that Section 10.5.3 be revised as follows:

**10.5.3** – The TC shall have the right to request the TP to release unscheduled capacity associated with a confirmed request to Redirect on a Non-Firm basis and reinstate that capacity to the Parent (Firm) Reservation. The TP shall honor all valid requests for release, and reinstate the released capacity to the Parent Reservation.

We Energies comments:

For all documents, definition of terms should be consistent with the NAESB Glossary and between documents. Inconsistencies were found in the definition of Affiliate, Transmission Customer, Firm Transmission, Non-firm Transmission, Point-to-Point Transmission Service, Network Service .

P. 10 of R04005-A, Standard 1.8 - A definition of "significant amount" is needed.

Thank you for the opportunity to comment.

Barb Kedrowski  
Project Manager  
We Energies

**NAESB WEQ RECOMMENDATION R04006 FOR STANDARDS**  
**STANDARDS OF CONDUCT FOR ELECTRIC TRANSMISSION PROVIDERS**  
**HYDRO-QUÉBEC TRANSÉNERGIE COMMENTS**  
**September 20, 2004**

This Standards Recommendation has been drafted as a direct conversion of FERC Order 2004 into Business Standards. It must be realized that NAESB must prepare Business Standards that could apply internationally, meaning to Canadian entities also. Therefore the translation from a FERC Order, necessarily written for U.S. only, into such international Business Standards requires some adaptation work that has not been done in this Recommendation.

The term "Commission" is used but is not defined in this Recommendation. We presume it was intended to be defined as in R04005-A. As we stated in that case, that term should be replaced by "Appropriate Regulating Authority" (or some other term) and should be defined as the entity which has regulating authority over a given Transmission Provider. The whole document should then be revised with this international intent in mind.

Our comments on the definition of "Transmission Provider" stated for Recommendation R04005 also apply: A Transmission Provider is not necessarily a "public utility". The definition should be broadened to include all possibilities and specify that it is used for those who provide Open Access to their electric Transmission System. As written the definition seems to encompass even systems which do not offer such access. The term "interstate" is also limiting regarding the international nature of a Business Standard. We also question that a Transmission Provider is not necessarily operating "interstate" even in the U.S. As a first try, the resulting definition for Transmission Provider could then read: "An entity that owns, operates or control facilities used for the transmission of electric energy and that offers open access transmission service over those facilities".

The proposed text also refers to "Marketing Affiliate". That definition has been omitted. It should be reintroduced to read:  
"(k) Marketing Affiliate means an Affiliate as that term is defined in 3(b) or a unit that engages in marketing, sales or brokering activities as those terms are defined at 3(e)."

A small editorial note: In 5(1), "of the its Marketing .." has to be corrected to "of its Marketing...".

Submitted by Victor Bissonnette  
Délégué commercial  
Direction Commercialisation  
Hydro-Québec TransÉnergie

**Comments on  
NAESB Business Practice Request on  
FERC Standards of Conduct  
Submitted by  
John E. Lucas, Director Transmission Policy and Services  
Southern Company Services, Inc.**

- The proposal to adopt a new standard to implement the Standards of Conduct requirements in FERC Order No. 2004 should be referred back to the NAESB Electronic Scheduling Subcommittee for further consideration until, at a minimum, FERC issues its rehearing order on requests for rehearing of Order No. 2004-B.
- Procedurally, the proposal is premature because requests for rehearing remain pending to Order No. 2004-B. Among other filings, EEI has submitted a request for rehearing regarding the applicability of certain exemptions to electric transmission providers. In addition, court appeals of the Standards of Conduct Orders remain pending. These pending actions could ultimately result in a revised regulatory text.
- Regarding the regulatory text, the proposal does not incorporate the currently effective regulatory text in its entirety. This creates unwarranted confusion and further supports referring the proposal back to the NAESB Electronic Scheduling Subcommittee for further consideration.

September 20, 2004



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** NAESB Electronic Scheduling Subcommittee  
**Request No.:** R04006  
**Request Title:** Modifications to OASIS Business Practices

**1. RECOMMENDED ACTION:**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:**

Adopt a new standard to implement the Standards of Conduct requirements detailed in FERC Order 2004.

**RECOMMENDED STANDARDS:**

Standards of Conduct for Electric Transmission Providers  
 ([see](#) Chapter I, Title 18 CFR Part 358)

**1.0 Applicability**

This standard applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy [in](#) interstate commerce.



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**2.0 General principles** [n1]

(a) A Transmission Provider's employees engaged in transmission system operations must function independently from the Transmission Provider's marketing and sales employees, and from any employees of its Energy Affiliates.

(b) A Transmission Provider must treat all transmission customers, affiliated and non-affiliated, on a non-discriminatory basis, and must not operate its transmission system to preferentially benefit an Energy Affiliate.

**3.0 Definitions.**

(a) Transmission Provider means:

(1) Any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce

(2) Reserved

(3) Reserved

(b) Affiliate means:

(1) Another person which controls, is controlled by or is under common control with, such person. An Affiliate includes a division that operates as a functional unit, and

(2) For any exempt wholesale generator, as defined under 32(a) of the Public Utility Holding Company Act of 1935, as amended, the same as provided in Section 214 of the Federal Power Act.

(c) Control (including the terms "controlling," "controlled by," and "under common control with") as used in this standard, includes, but is not limited to, the possession, directly or indirectly and whether acting alone or in conjunction with others, of the authority to direct or cause the direction of the management or policies of a company. A voting interest of 10 percent or more creates a rebuttable presumption of control.

(d) Energy Affiliate means an affiliate of a Transmission Provider that:

(1) Engages in or is involved in transmission transactions in U.S. energy or transmission markets; or

(2) Manages or controls transmission capacity of a Transmission Provider in U.S. energy or transmission markets; or

(3) Buys, sells, trades or administers electric energy in U.S. energy or transmission markets; or

(4) Engages in financial transactions relating to the sale or transmission of electric energy in U.S. energy or transmission markets.

(5) An LDC division of an electric public utility Transmission Provider shall be considered the functional equivalent of an Energy Affiliate, unless it qualifies for the exemption in Requirement 3.0(d)(6)(v).

(6) An Energy Affiliate does not include:

(i) A foreign affiliate that does not participate in U.S. energy markets;

(ii) An affiliated Transmission Provider;

(iii) A holding, parent or service company that does not engage in energy commodity markets or is not involved in transmission transactions in U.S. energy markets;

(iv) An affiliate that purchases energy solely for its own consumption. "Solely for its own consumption" does not include the purchase of energy for subsequent generation of electricity.



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(v) Reserved

(vi) Reserved

(e) Marketing, sales or brokering means a sale for resale of electric energy in interstate commerce. Sales and marketing employee or unit includes:

(1) Reserved

(2) A public utility Transmission Provider's energy sales unit, unless such unit engages solely in bundled retail sales.

(3) Reserved

(f) Transmission means electric transmission, network or point-to-point service, reliability service, ancillary services or other methods of transportation or the interconnection with jurisdictional transmission facilities.

(g) Transmission Customer means any eligible customer, shipper or designated agent that can or does execute a transmission service agreement or can or does receive transmission service, including all persons who have pending requests for transmission service or for information regarding transmission.

(h) Open Access Same-time Information System or OASIS refers to the Internet location where a public utility posts the information, by electronic means.

(i) Reserved

(j) Transmission Function employee means an employee, contractor, consultant or agent of a Transmission Provider who conducts transmission system operations or reliability functions, including, but not limited to, those who are engaged in day-to-day duties and responsibilities for planning, directing, organizing or carrying out transmission-related operations.

(k) Marketing Affiliate means an affiliate as that term is defined in Requirement 3.0(b) or a unit that engages in marketing, sales or brokering activities as those terms are defined at Requirement 3.0(e).

**4.0 Independent functioning.**

(a) Separation of functions.

(1) Except in emergency circumstances affecting system reliability, the transmission function employees of the Transmission Provider must function independently of the Transmission Provider's Marketing or Energy Affiliates' employees.

(2) Notwithstanding any other provisions in this section, in emergency circumstances affecting system reliability, a Transmission Provider may take whatever steps are necessary to keep the system in operation. Transmission Providers must report to the Commission and post on the OASIS each emergency that resulted in any deviation from the standards of conduct, within 24 hours of such deviation.

(3) The Transmission Provider is prohibited from permitting the employees of its Marketing or Energy Affiliates from:

(i) Conducting transmission system operations or reliability functions; and

(ii) Having access to the system control center or similar facilities used for transmission operations or reliability functions that differs in any way from the access available to other transmission customers.

(4) Transmission Providers are permitted to share support employees and field and



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maintenance employees with their Marketing and Energy Affiliates.

(5) Transmission Providers are permitted to share with their Marketing or Energy Affiliates senior officers and directors who are not "Transmission Function Employees" as that term is defined in Requirement 3.0(j). A Transmission Provider may share transmission information covered by Requirement 5.0(a) and (b) with its shared senior officers and directors provided that they do not participate in directing, organizing or executing transmission system operations or marketing functions; or act as a conduit to share such information with a Marketing or Energy Affiliate.

(6) Transmission Providers are permitted to share risk management employees that are not engaged in Transmission Functions or sales or commodity Functions with their Marketing and Energy Affiliates.

(b) Identifying affiliates on the public Internet.

(1) A Transmission Provider must post the names and addresses of its Marketing and Energy Affiliates on its OASIS.

(2) A Transmission Provider must post on its OASIS a complete list of the facilities shared by the Transmission Provider and its Marketing or Energy Affiliates, including the types of facilities shared and their addresses.

(3) A Transmission Provider must post comprehensive organizational charts showing:

(i) The organizational structure of the parent corporation with the relative position in the corporate structure of the Transmission Provider, Marketing and Energy Affiliates;

(ii) For the Transmission Provider, the business units, job titles and descriptions, and chain of command for all positions, including officers and directors, with the exception of clerical, maintenance, and field positions. The job titles and descriptions must include the employee's title, the employee's duties, whether the employee is involved in transmission or sales, and the name of the supervisory employees who manage non-clerical employees involved in transmission or sales.

(iii) For all employees who are engaged in transmission functions for the Transmission Provider and marketing or sales functions or who are engaged in transmission functions for the Transmission Provider and are employed by any of the Energy Affiliates, the Transmission Provider must post the name of the business unit within the marketing or sales unit or the Energy Affiliate, the organizational structure in which the employee is located, the employee's name, job title and job description in the marketing or sales unit or Energy Affiliate, and the employee's position within the chain of command of the Marketing or Energy Affiliate.

(iv) The Transmission Provider must update the information on its OASIS, required by Requirement 4.0 (1), (2) and (3) within seven business days of any change, and post the date on which the information was updated.

(v) The Transmission Provider must post information concerning potential merger partners as affiliates within seven days after the merger is announced.

(vi) All OASIS postings required by this standard must comply, as applicable, with Requirement 1.3 of the NAESB Business Practices for Open Access Same-Time Information Systems.

(c) Transfers. Employees of the Transmission Provider, Marketing or Energy Affiliates are not precluded from transferring among such functions as long as such transfer is not used as a means to circumvent the Standards of Conduct. Notices of any employee transfers





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between the Transmission Provider, on the one hand, and the Marketing or Energy Affiliate, on the other, must be posted on the OASIS. The information to be posted must include: the name of the transferring employee, the respective titles held while performing each function (i.e., on behalf of the Transmission Provider, Marketing or Energy Affiliate), and the effective date of the transfer. The information posted under this section must remain on the OASIS for 90 days.

(d) Books and records. A Transmission Provider must maintain its books of account and records (as prescribed in 18 CFR) separately from those of its Energy Affiliates and these must be available for Commission inspections.



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(e) Written procedures.

(1) Each Transmission Provider is required to file with the Commission and post on the OASIS a plan and schedule for implementing the standards of conduct.

(2) Each Transmission Provider must be in full compliance with the Standards of Conduct by September 22, 2004.

(3) The Transmission Provider must post on the OASIS current written procedures implementing the standards of conduct in such detail as will enable customers and the Commission to determine that the Transmission Provider is in compliance with the requirements of this section by September 22, 2004 or within 30 days of becoming subject to the requirements of this standard.

(4) Transmission Providers will distribute the written procedures to all Transmission Provider employees and employees of the Marketing and Energy Affiliates.

(5) Transmission Providers shall train officers and directors as well as employees with access to transmission information or information concerning electric purchases, sales or marketing functions. The Transmission Provider shall require each employee to sign a document or certify electronically signifying that s/he has participated in the training.

(6) Transmission Providers are required to designate a Chief Compliance Officer who will be responsible for standards of conduct compliance.

**5.0 Non-discrimination requirements.**

(a) Information access.

(1) The Transmission Provider must ensure that any employee of the its Marketing or Energy Affiliate may only have access to that information available to the Transmission Provider's transmission customers (i.e., the information posted on the OASIS) and must not have access to any information about the Transmission Provider's transmission system that is not available to all users of an OASIS.

(2) The Transmission Provider must ensure that any employee of its Marketing or Energy Affiliate is prohibited from obtaining information about the Transmission Provider's transmission system (including, but not limited to, information about available transmission capability, price, curtailments, storage, ancillary services, balancing, maintenance activity, capacity expansion plans or similar information) through access to information not posted on the OASIS or that is not otherwise also available to the general public without restriction.

~~system (including, but not limited to, information about available transmission capability, price, curtailments, storage, ancillary services, balancing, maintenance activity, capacity expansion plans or similar information) through access to information not posted on the OASIS or that is not otherwise also available to the general public without restriction.~~

(b) Prohibited disclosure.

(1) An employee of the Transmission Provider may not disclose to its Marketing or Energy Affiliates any information concerning the transmission system of the Transmission Provider or the transmission system of another (including, but not limited to, information received from non-affiliates or information about available transmission capability, price, curtailments, storage, ancillary services, balancing, maintenance activity, capacity expansion plans, or similar information) through non-public communications conducted off the OASIS, through access to information not posted on



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the OASIS that is not contemporaneously available to the public, or through information on the OASIS that is not at the same time publicly available.

(2) A Transmission Provider may not share any information, acquired from nonaffiliated transmission customers or potential nonaffiliated transmission customers, or developed in the course of responding to requests for transmission or ancillary service on the OASIS with employees of its Marketing or Energy Affiliates, except to the limited extent information is required to be posted on the OASIS in response to a request for transmission service or ancillary services.

(3) If an employee of the Transmission Provider discloses information in a manner contrary to the requirements of Requirement 5.0 (b)(1) and (2), the Transmission Provider must immediately post such information on the OASIS.

(4) A non-affiliated transmission customer may voluntarily consent, in writing, to allow the Transmission Provider to share the non-affiliated customer's information with a Marketing or Energy Affiliate. If a non-affiliated customer authorizes the transmission Provider to share its information with a Marketing or Energy Affiliate, the Transmission Provider must post notice on the OASIS of that consent along with a statement that it did not provide any preferences, either operational or rate-related, in exchange for that voluntary consent.

(5) A Transmission Provider is not required to contemporaneously disclose to all transmission customers or potential transmission customers information covered by Requirement 5.0 (b)(1) if it relates solely to a Marketing or Energy Affiliate's specific request for transmission service.

(6) A Transmission Provider may share generation information necessary to perform generation dispatch with its Marketing and Energy Affiliate that does not include specific information about individual third party transmission transactions or potential transmission arrangements.

(7) Neither a Transmission Provider nor an employee of a Transmission Provider is permitted to use anyone as a conduit for sharing information covered by the prohibitions of Requirement 5.0 (b)(1) and (2) with a marketing or Energy Affiliate. A Transmission Provider may share information covered by Requirement 5.0 (b)(1) and (2) with employees permitted to be shared under Requirement 4.0 (a)(4), (5) and (6) provided that such employees do not act as a conduit to share such information with any Marketing or Energy Affiliates.

(8) A Transmission Provider is permitted to share information necessary to maintain the operations of the transmission system with its Energy Affiliates.

(c) Implementing tariffs.

(1) A Transmission Provider must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if these tariff provisions do not permit the use of discretion

(2) A Transmission Provider must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all transmission customers in a non-discriminatory manner, if these tariff provisions permit the use of discretion.

(3) A Transmission Provider must process all similar requests for transmission in the same manner and within the same period of time.

(4) The Transmission Provider must maintain a written log, available for



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Commission audit, detailing the circumstances and manner in which it exercised its discretion under any terms of the tariff. The information contained in this log is to be posted on the within 24 hours of when a Transmission Provider exercises its discretion under any terms of the tariff.

(5) The Transmission Provider may not, through its tariffs or otherwise, give preference to its own Marketing or Energy Affiliate, over any other wholesale customer in matters relating to the sale or purchase of transmission service (including, but not limited to, issues of price, curtailments, scheduling, priority, ancillary services, or balancing).

(d) Discounts.

Any offer of a discount for any transmission service made by the Transmission Provider must be posted on the OASIS contemporaneous with the time that the offer is contractually binding. The posting must include: the name of the customer involved in the discount and whether it is an affiliate or whether an affiliate is involved in the transaction, the rate offered; the maximum rate; the time period for which the discount would apply; the quantity of power scheduled to be moved; the delivery points under the transaction; and any conditions or requirements applicable to the discount. The posting must remain on the OASIS for 60 days from the date of posting.

#### **4. SUPPORTING DOCUMENTATION**

**a. Description of Request:**

FERC Orders 2004, 2004A and 2004B detail modified Standards of Conduct for Transmission Providers, to replace the current Standards of Conduct language contained in Requirement 1.4-3 of the NAESB Business Practices for Open Access Same-Time Information Systems.

**b. Description of Recommendation:**

Adopt standards as recommended.

**c. Business Purpose:**

Adopt Standard of Conduct requirements consistent with FERC Orders 2004, 2004A, and 2004B.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

Discussion on this recommendation can be found in the following minutes:

WEQ ESS/ ITS	May 26-27, 2004	<a href="http://www.naesb.org/pdf/weq_ess_its052604dm.doc">http://www.naesb.org/pdf/weq_ess_its052604dm.doc</a>
WEQ ESS/ ITS	July 28-29, 2004	
WEQ ESS/ ITS	August 17, 2004	

We Energies comments:

For all documents, definition of terms should be consistent with the NAESB Glossary and between documents. Inconsistencies were found in the definition of Affiliate, Transmission Customer, Firm Transmission, Non-firm Transmission, Point-to-Point Transmission Service, Network Service .

P. 10 of R04005-A, Standard 1.8 - A definition of "significant amount" is needed.

Thank you for the opportunity to comment.

Barb Kedrowski  
Project Manager  
We Energies



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** NAESB Electronic Scheduling Subcommittee  
**Request No.:** R04006A  
**Request Title:** Modifications to OASIS Business Practices

**Comments of the ESS/ITS**

**1. RECOMMENDED ACTION:**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
- Principle Definition
- Business Practice Standard Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
- Principle Definition
- Business Practice Standard Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:**

Adopt a new standard to implement the Standards of Conduct requirements detailed in FERC Order 2004.

**RECOMMENDED STANDARDS:**

Standards of Conduct for Electric Transmission Providers

**1.0 Applicability**

(a) Reserved



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
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**Comments of the ESS/ITS**

- (b) This standard applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.
- (c) This standard does not apply to a public utility Transmission Provider that is a Commission-approved Independent System Operator (ISO) or Regional Transmission Organization (RTO). If a public utility transmission owner participates in a Commission-approved ISO or RTO and does not operate or control its transmission facilities and has no access to transmission, customer or market information covered by Requirement 5.0(b), it may request an exemption from this standard.
- (d) Transmission Provider may file a request for an exemption from all or some of the requirements of this part for good cause.

**2.0 General principles**

- (a) A Transmission Provider's employees engaged in transmission system operations must function independent from the employees of its Marketing and Energy Affiliates.
- (b) A Transmission Provider must treat all transmission customers, affiliated and non-affiliated, on a non-discriminatory basis, and must not operate its transmission system to preferentially benefit its Marketing or Energy Affiliates.

**3.0 Definitions.**

- (a) Transmission Provider means:
  - (1) Any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce
  - (2) Reserved
  - (3) Reserved
- (b) Affiliate means:
  - (1) Another person which controls, is controlled by or is under common control with, such person. An Affiliate includes a division that operates as a functional unit, and
  - (2) For any exempt wholesale generator, as defined under 32(a) of the Public Utility Holding Company Act of 1935, as amended, the same as provided in Section 214 of the Federal Power Act.
- (c) Control (including the terms "controlling," "controlled by," and "under common control with") as used in this standard, includes, but is not limited to, the possession, directly or indirectly and whether acting alone or in conjunction with others, of the authority to direct or cause the direction of the management or policies of a company. A voting interest of 10 percent or more creates a rebuttable presumption of control.
- (d) Energy Affiliate means an affiliate of a Transmission Provider that:
  - (1) Engages in or is involved in transmission transactions in U.S. energy or transmission markets; or
  - (2) Manages or controls transmission capacity of a Transmission Provider in U.S. energy or transmission markets; or
  - (3) Buys, sells, trades or administers electric energy in U.S. energy or transmission markets; or
  - (4) Engages in financial transactions relating to the sale or transmission of electric energy in U.S. energy or transmission markets.



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**Comments of the ESS/ITS**

- (5) An LDC division of an electric public utility Transmission Provider shall be considered the functional equivalent of an Energy Affiliate, unless it qualifies for the exemption in Requirement 3.0(d)(6)(v).
- (6) An Energy Affiliate does not include:
- (i) A foreign affiliate that does not participate in U.S. energy markets;
  - (ii) An affiliated Transmission Provider which is regulated by the state, provincial or national regulatory boards of the foreign country in which such facilities are located;
  - (iii) A holding, parent or service company that does not engage in energy commodity markets or is not involved in transmission transactions in U.S. energy markets;
  - (iv) An affiliate that purchases energy solely for its own consumption. "Solely for its own consumption" does not include the purchase of energy for subsequent generation of electricity.
  - (v) A State-regulated local distribution company that acquires interstate transmission capacity to purchase and resell gas only for on-system sales, and otherwise does not engage in the activities described in Requirement 3.0 (d)(1), (2), (3) or (4), except to the limited extent necessary to support on-system sales and to engage in de minimus sales necessary to remaining in balance under applicable pipeline tariff requirements.
  - (vi) A producer, gatherer, Hinshaw pipeline or an intrastate pipeline that makes incidental purchases or sales of de minimus volumes of natural gas to remain in balance under applicable pipeline tariff requirements and otherwise does not engage in the activities described in Requirement 3.0 (d)(1), (2), (3) or (4).
- (e) Marketing, sales or brokering means a sale for resale of electric energy in interstate commerce. Sales and marketing employee or unit includes:
- (1) Reserved
  - (2) A public utility Transmission Provider's energy sales unit, unless such unit engages solely in bundled retail sales.
  - (3) Reserved
- (f) Transmission means electric transmission, network or point-to-point service, reliability service, ancillary services or other methods of transportation or the interconnection with jurisdictional transmission facilities.
- (g) Transmission Customer means any eligible customer, shipper or designated agent that can or does execute a transmission service agreement or can or does receive transmission service, including all persons who have pending requests for transmission service or for information regarding transmission.
- (h) Open Access Same-time Information System or OASIS refers to the Internet location where a public utility posts the information, by electronic means, required by Standard 1 of the NAESB Business Practices for Open Access Same-Time Information Systems.
- (i) Reserved
- (j) Transmission Function employee means an employee, contractor, consultant or agent of a Transmission Provider who conducts transmission system operations or reliability





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**Comments of the ESS/ITS**

functions, including, but not limited to, those who are engaged in day-to-day duties and responsibilities for planning, directing, organizing or carrying out transmission-related operations.

(k) Marketing Affiliate means an affiliate as that term is defined in Requirement 3.0(b) or a unit that engages in marketing, sales or brokering activities as those terms are defined at Requirement 3.0(e).

**4.0 Independent functioning.**

(a) Separation of functions.

(1) Except in emergency circumstances affecting system reliability, the transmission function employees of the Transmission Provider must function independently of the Transmission Provider's Marketing or Energy Affiliates' employees.

(2) Notwithstanding any other provisions in this requirement, in emergency circumstances affecting system reliability, a Transmission Provider may take whatever steps are necessary to keep the system in operation. Transmission Providers must report to the Commission and post on the OASIS each emergency that resulted in any deviation from the standards of conduct, within 24 hours of such deviation.

(3) The Transmission Provider is prohibited from permitting the employees of its Marketing or Energy Affiliates from:

- (i) Conducting transmission system operations or reliability functions; and
- (ii) Having access to the system control center or similar facilities used for transmission operations or reliability functions that differs in any way from the access available to other transmission customers.

(4) Transmission Providers are permitted to share support employees and field and maintenance employees with their Marketing and Energy Affiliates.

(5) Transmission Providers are permitted to share with their Marketing or Energy Affiliates senior officers and directors who are not "Transmission Function Employees" as that term is defined in Requirement 3.0(j). A Transmission Provider may share transmission information covered by Requirement 5.0(a) and (b) with its shared senior officers and directors provided that they do not participate in directing, organizing or executing transmission system operations or marketing functions; or act as a conduit to share such information with a Marketing or Energy Affiliate.

(6) Transmission Providers are permitted to share risk management employees that are not engaged in Transmission Functions or sales or commodity Functions with their Marketing and Energy Affiliates.

(b) Identifying affiliates on the public Internet.

(1) A Transmission Provider must post the names and addresses of its Marketing and Energy Affiliates on its OASIS.



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**For Quadrant: Wholesale Electric Quadrant**

**Requesters: NAESB Electronic Scheduling Subcommittee**  
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**Comments of the ESS/ITS**

(2) A Transmission Provider must post on its OASIS a complete list of the facilities shared by the Transmission Provider and its Marketing or Energy Affiliates, including the types of facilities shared and their addresses.

(3) A Transmission Provider must post comprehensive organizational charts showing:

(i) The organizational structure of the parent corporation with the relative position

in the corporate structure of the Transmission Provider, Marketing and Energy Affiliates;

(ii) For the Transmission Provider, the business units, job titles and descriptions, and chain of command for all positions, including officers and directors, with the exception of clerical, maintenance, and field positions. The job titles and descriptions must include the employee's title, the employee's duties, whether the employee is involved in transmission or sales, and the name of the supervisory employees who manage non-clerical employees involved in transmission or sales.

(iii) For all employees who are engaged in transmission functions for the Transmission Provider and marketing or sales functions or who are engaged in transmission functions for the Transmission Provider and are employed by any of the Energy Affiliates, the Transmission Provider must post the name of the business unit within the marketing or sales unit or the Energy Affiliate, the organizational structure in which the employee is located, the employee's name, job title and job description in the marketing or sales unit or Energy Affiliate, and the employee's position within the chain of command of the Marketing or Energy Affiliate.

(iv) The Transmission Provider must update the information on its OASIS, required by Requirement 4.0 (b) (1), (2) and (3) within seven business days of any change, and post the date on which the information was updated.

(v) The Transmission Provider must post information concerning potential merger partners as affiliates within seven days after the potential merger is announced.

(vi) All OASIS postings required by this standard must comply, as applicable, with the requirements of Standard 1.3 of the NAESB Business Practices for Open Access Same-Time Information Systems.

(c) Transfers. Employees of the Transmission Provider, Marketing or Energy Affiliates are not precluded from transferring among such functions as long as such transfer is not used as a means to circumvent the Standards of Conduct. Notices of any employee transfers between the Transmission Provider, on the one hand, and the Marketing or Energy Affiliates, on the other, must be posted on the OASIS. The information to be posted must include: the name of the transferring employee, the respective titles held while performing each function (i.e., on behalf of the Transmission Provider, Marketing or Energy Affiliate), and the effective date of the transfer. The information posted under this requirement must remain on the OASIS for 90 days.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters: NAESB Electronic Scheduling Subcommittee**  
**Request No.: R04006A**  
**Request Title: Modifications to OASIS Business Practices**

**Comments of the ESS/ITS**

(d) Books and records. A Transmission Provider must maintain its books of account and records (as prescribed in Chapter I, Title18 CFR) separately from those of its Energy Affiliates and these must be available for Commission inspections

(e) Written procedures.

(1) By [insert date that is 60 days after publication in the FEDERAL REGISTER], each Transmission Provider is required to file with the Commission and post on the OASIS a plan and schedule for implementing the standards of conduct.

(2) Each Transmission Provider must be in full compliance with the Standards of Conduct by September 22, 2004.

(3) The Transmission Provider must post on the OASIS current written procedures implementing the standards of conduct in such detail as will enable customers and the Commission to determine that the Transmission Provider is in compliance with the requirements of this requirement by September 22, 2004 or within 30 days of becoming subject to the requirements of this standard.

(4) Transmission Providers will distribute the written procedures to all Transmission Provider employees and employees of the Marketing and Energy Affiliates.

(5) Transmission Providers shall train officers and directors as well as employees with access to transmission information or information concerning electric purchases, sales or marketing functions. The Transmission Provider shall require each employee to sign a document or certify electronically signifying that s/he has participated in the training.

(6) Transmission Providers are required to designate a Chief Compliance Officer who will be responsible for standards of conduct compliance.

**5.0 Non-discrimination requirements.**

(a) Information access.

(1) The Transmission Provider must ensure that any employee of the its Marketing or Energy Affiliate may only have access to that information available to the Transmission Provider's transmission customers (i.e., the information posted on the OASIS) and must not have access to any information about the Transmission Provider's transmission system that is not available to all users of an OASIS.

(2) The Transmission Provider must ensure that any employee of its Marketing or Energy Affiliate is prohibited from obtaining information about the Transmission Provider's transmission system (including, but not limited to, information about available transmission capability, price, curtailments, storage, ancillary services, balancing, maintenance activity, capacity expansion plans or similar information) through access to information not posted on the OASIS or that is not otherwise also available to the general public without restriction.

(b) Prohibited disclosure.

(1) An employee of the Transmission Provider may not disclose to its Marketing or Energy Affiliates any information concerning the transmission system of the Transmission Provider or the transmission system of another (including, but not



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
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**Comments of the ESS/ITS**

limited to, information received from non-affiliates or information about available transmission capability, price, curtailments, storage, ancillary services, balancing, maintenance activity, capacity expansion plans, or similar information) through non-public communications conducted off the OASIS, through access to information not posted on the OASIS that is not contemporaneously available to the public, or through information on the OASIS that is not at the same time publicly available.

(2) A Transmission Provider may not share any information, acquired from nonaffiliated transmission customers or potential nonaffiliated transmission customers, or developed in the course of responding to requests for transmission or ancillary service on the OASIS with employees of its Marketing or Energy Affiliates, except to the limited extent information is required to be posted on the OASIS in response to a request for transmission service or ancillary services.

(3) If an employee of the Transmission Provider discloses information in a manner contrary to the requirements of Requirement 5.0 (b)(1) and (2), the Transmission Provider must immediately post such information on the OASIS.

(4) A non-affiliated transmission customer may voluntarily consent, in writing, to allow the Transmission Provider to share the non-affiliated customer's information with a Marketing or Energy Affiliate. If a non-affiliated customer authorizes the Transmission Provider to share its information with a Marketing or Energy Affiliate, the Transmission Provider must post notice on the OASIS of that consent along with a statement that it did not provide any preferences, either operational or rate-related, in exchange for that voluntary consent.

(5) A Transmission Provider is not required to contemporaneously disclose to all transmission customers or potential transmission customers information covered by Requirement 5.0 (b)(1) if it relates solely to a Marketing or Energy Affiliate's specific request for transmission service.

(6) A Transmission Provider may share generation information necessary to perform generation dispatch with its Marketing and Energy Affiliate that does not include specific information about individual third party transmission transactions or potential transmission arrangements.

(7) Neither a Transmission Provider nor an employee of a Transmission Provider is permitted to use anyone as a conduit for sharing information covered by the prohibitions of Requirement 5.0 (b)(1) and (2) with a marketing or Energy Affiliate. A Transmission Provider may share information covered by Requirement 5.0 (b)(1) and (2) with employees permitted to be shared under Requirement 4.0 (a)(4), (5) and (6) provided that such employees do not act as a conduit to share such information with any Marketing or Energy Affiliates.

(8) A Transmission Provider is permitted to share information necessary to maintain the operations of the transmission system with its Energy Affiliates.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: NAESB Electronic Scheduling Subcommittee  
Request No.: R04006A  
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**Comments of the ESS/ITS**

(c) Implementing tariffs.

(1) A Transmission Provider must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if these tariff provisions do not permit the use of discretion.

(2) A Transmission Provider must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all transmission customers in a non-discriminatory manner, if these tariff provisions permit the use of discretion.

(3) A Transmission Provider must process all similar requests for transmission in the same manner and within the same period of time.

(4) The Transmission Provider must maintain a written log, available for Commission audit, detailing the circumstances and manner in which it exercised its discretion under any terms of the tariff. The information contained in this log is to be posted on the OASIS within 24 hours of when a Transmission Provider exercises its discretion under any terms of the tariff.

(5) The Transmission Provider may not, through its tariffs or otherwise, give preference to its own Marketing or Energy Affiliate, over any other wholesale customer in matters relating to the sale or purchase of transmission service (including, but not limited to, issues of price, curtailments, scheduling, priority, ancillary services, or balancing).

(d) Discounts.

Any offer of a discount for any transmission service made by the Transmission Provider must be posted on the OASIS contemporaneous with the time that the offer is contractually binding. The posting must include: the name of the customer involved in the discount and whether it is an affiliate or whether an affiliate is involved in the transaction, the rate offered; the maximum rate; the time period for which the discount would apply; the quantity of power scheduled to be moved; the delivery points under the transaction; and any conditions or requirements applicable to the discount. The posting must remain on the OASIS for 60 days from the date of posting.

#### **4. SUPPORTING DOCUMENTATION**

**a. Description of Request:**

FERC Orders 2004, 2004A and 2004B detail modified Standards of Conduct for Transmission Providers(Chapter I, Title18 CFR Part 358), to replace the current Standards of Conduct language contained in Requirement 1.4 of the NAESB Business Practices for Open Access Same-Time Information Systems.

**b. Description of Recommendation:**

Adopt standards as recommended.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: NAESB Electronic Scheduling Subcommittee  
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**Comments of the ESS/ITS**

**c. Business Purpose:**

Adopt Standard of Conduct requirements consistent with FERC Orders 2004, 2004A, and 2004B.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

Discussion on this recommendation can be found in the following minutes:

WEQ ESS/ ITS	May 26-27, 2004	<a href="http://www.naesb.org/pdf/weq_ess_its052604dm.doc">http://www.naesb.org/pdf/weq_ess_its052604dm.doc</a>
WEQ ESS/ ITS	July 28-29, 2004	
WEQ ESS/ ITS	August 17, 2004	

## Comment Form

# Inadvertent Interchange Version 0 Draft 3 WEQBPS-005-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:Carl Monroe, NERC RS Chairman
Comments submitted on Behalf of Organization	:NERC Resources Subcommittee
Email of Contact	:cmonroe@spp.org
Phone Number on Contact	:501 664 0146

### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

### Comments on Appendices (List comments by Appendix Subsection)

### General Comments

The NERC Resources Subcommittee recommends the name of this NAESB Business Practice Standard be “Inadvertent Interchange Payback” since Payback is used throughout the standard.

The RS would also be satisfied with “Inadvertent Interchange Settlement” as the title.

## Comment Form

# ACE Special Cases Version 0 Draft 3 WEQBPS-003-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	: Carl Monroe, NERC RS Chairman
Comments submitted on Behalf of Organization	: NERC Resources Subcommittee
Email of Contact	: cmonroe@spp.org
Phone Number on Contact	: 501 664 0146

### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

1. The NERC Resources Subcommittee does not believe that this standard is necessary. All definitions that relate to ACE need to be contained within the NERC ACE Standard. Part of the reason is that it needs to be considered in the scheduling practices and TLR practices.
2. Ensure that any term that affects the ACE equation needs to be entered as equal and opposite values by both parties (Balancing Authorities source and sink).
3. A requirement (procedure) needs to be in place to direct both BAs on how to handle situations (back-up procedures) when telemetry fails.
4. Representation of ACE equation Inadvertent Interchange metric terminology needs to be the same as the Inadvertent Interchange metric terminology for consistency.
5. Supplemental Regulation Services should specify not only Dynamic Schedules but should also include Pseudo Ties.
6. Requirements 3.1.1. and 3.1.2. if the load is assumed to be a positive value, the sign is incorrect. The language within the standard needs to be crystal clear. 3.1.3. also seems to be backwards.



## **Comments on Appendices (List comments by Appendix Subsection)**

### **General Comments**

- 7. The NERC Resources Subcommittee does not believe that this standard is necessary. All definitions that relate to ACE need to be contained within the NERC ACE Standard. Part of the reason is that it needs to be considered in the scheduling practices and TLR practices.**

## Comment Form

# Time Error Version 0 Draft 3 WEQBPS-004-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	: Carl Monroe, NERC RS Chairman
Comments submitted on Behalf of Organization	: NERC Resources Subcommittee
Email of Contact	: cmonroe@spp.org
Phone Number on Contact	: 501 664 0146

### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

1. NAESB Business Practice Standard SDT needs to check with each of the Interconnection Time Error Monitors (Eastern Interconnection, Western Interconnection, ERCOT Interconnection, Hydro Quebec) to ensure the time periods that are exempt from active ime error correction are identified and secified.
2. Requirement #11 recommends: “. . . . devices to coincide with the time error of the interconnection.” Be enhanced to read “. . . . devices to coincide with the time error of the Interconnection Time Error Monitor.”

### General Comments

## Comment Form

# Time Error Version 0 Draft 3 WEQBPS-004-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:	Gary Nolan
Comments submitted on Behalf of Organization	:	Salt River Project
Email of Contact	:	ganolan@srpnet.com
Phone Number on Contact	:	602.236.0922

### Comments on Definitions (List comments by Definition)

WECCNet is listed but is given no definition.

### Comments on Requirements (List comments by Requirement Number)

### General Comments

## Comment Form

# Coordinate Interchange Version 0 Draft 3 WEQBPS-002-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:	Gary Nolan
Comments submitted on Behalf of Organization	:	Salt River Project
Email of Contact	:	ganolan@srpnet.com
Phone Number on Contact	:	602.236.0922

### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

Requirement 2 has “Transmission” capitalized even though it is not part of a defined term.

I believe Requirement 13 requiring the Sink BA to reload the tag after a curtailment is incorrect. The entity who curtailed the tag originally knows how much and when to reload the tag. This is critical because there is no requirement for the Scheduling Entity who had to curtail the tag to contact the Sink BA to advise them to reload it.

Around line 396, the word “Internet” is needlessly capitalized and then not capitalized. At least be consistent.

### Comments on Appendices (List comments by Appendix Subsection)

Appendix A – NERC document referenced has had its name changed and needs corrected here.

**Appendix B – The word “Component” is not a defined term and should not be capitalized.**

**“Tag Agent User” is fully capitalized in line 298 but not on line 295. Be consistent.**

**From line 347-350, “Email” is neither a defined term nor a proper noun and therefore should not be capitalized.**

<b>General Comments</b>
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## Comment Form

# Coordinate Interchange Version 0 Draft 3 WEQBPS-002-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:	Michael Pfeister
Comments submitted on Behalf of Organization	:	Salt River Project
Email of Contact	:	MJPFEIST@srpnet.com
Phone Number on Contact	:	602.236.3970

### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

2.1 - Not so sure this is a good idea for the PSE to defer this responsibility to the Market Operator. It makes more sense for the PSE to defer the tasks, yet the PSE should retain the responsibility.  
6 - Why so specific on E-Tag 1.7.095?

### Comments on Appendices (List comments by Appendix Subsection)

## General Comments

## Comment Form

# Coordinate Interchange Version 0 Draft 3 WEQBPS-002-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:	Gordon Brown
Comments submitted on Behalf of Organization	:	CAISO
Email of Contact	:	gbrown@caiso.com
Phone Number on Contact	:	(626) 537-2788

### Comments on Definitions (List comments by Definition)

- The Definitions section contains a mismatched collection of definitions taken from various sources such as the Functional Model, NERC Terms and Policies, etc., many of which are still in the process of being updated. I suggest that in order to achieve a consistent set of definitions, we match NAESB Standards definition to the Glossary that will be incorporated in NERC Version 0 Standards. To the extent that the NERC Version 0 definition does not satisfy the need for the NAESB Standard, i.e. requires more explanation, etc., NAESB would supply an appropriate definition, subject to reaching consensus the definition's validity and/or appropriateness.

### Comments on Requirements (List comments by Requirement Number)

### Comments on Appendices (List comments by Appendix Subsection)



## General Comments

## Comment Form

# ACE Special Cases Version 0 Draft 3 WEQBPS-003-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:	Gordon Brown
Comments submitted on Behalf of Organization	:	CAISO
Email of Contact	:	gbrown@caiso.com
Phone Number on Contact	:	(626) 537-2788

### Comments on Definitions (List comments by Definition)

- The Definitions section contains a mismatched collection of definitions taken from various sources such as the Functional Model, NERC Terms and Policies, etc., many of which are still in the process of being updated. I suggest that in order to achieve a consistent set of definitions, we match NAESB Standards definition to the Glossary that will be incorporated in NERC Version 0 Standards. To the extent that the NERC Version 0 definition does not satisfy the need for the NAESB Standard, i.e. the term requires more explanation, etc., NAESB would supply an appropriate definition, subject to reaching consensus on the definition's validity and/or appropriateness.

### Comments on Requirements (List comments by Requirement Number)

- 

### Comments on Appendices (List comments by Appendix Subsection)

-

## General Comments

- After reviewing this latest draft of NAESB's proposed Business Standard, it has become increasingly clear that the issue of "ACE Equation, Special Cases" has been inappropriately assigned to NAESB. The subject of generation control, and thus the ACE expression, is innately linked to physical generator movement, actual interchange flow, and grid reliability. To segregate a small, yet important portion of the ACE expression for any purpose is irresponsible, and simply does not meet any test of reasonableness. It is important that the entire ACE expression is managed by a single entity, namely the Regional Council, in order to ensure that 1) ACE is not compromised, 2) special cases are addressed appropriately with sufficient accommodation for regional differences, and above all, 3) reliability is maintained. More importantly, however, the subject of ACE, and its various components should never be opened to voting by non-impacted parties. Regional Councils are the parties responsible for determine the ACE methodology and coordinating such methodology among the Control Areas/Balancing Authorities within that Region. If NAESB has concerns that a Region's AGC methodology is somehow incorrect, or perhaps needs to be modified to meet changing market conditions, then NAESB should first approach the various Regional Councils to solicit their approval (even if only in concept) and the approval of their members before attempting to create standards and submitting it for vote among non-impacted parties, such as NERC, and extra-Regional entities.
- The WECC variant of the ACE expression, including the automatic time error correction term is not reflected in this Standard even though it is a regional business practice.
- The term "ACE Expression", or "ACE Formula" is preferable to "ACE Equation".

## Comment Form

# Time Error Version 0 Draft 3 WEQBPS-004-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:	Gordon Brown
Comments submitted on Behalf of Organization	:	CAISO
Email of Contact	:	gbrown@caiso.com
Phone Number on Contact	:	(626) 537-2788

### Comments on Definitions (List comments by Definition)

- The Definitions section contains a mismatched collection of definitions taken from various sources such as the Functional Model, NERC Terms and Policies, etc., many of which are still in the process of being updated. I suggest that in order to achieve a consistent set of definitions, we match NAESB Standards definition to the Glossary that will be incorporated in NERC Version 0 Standards. To the extent that the NERC Version 0 definition does not satisfy the need for the NAESB Standard, i.e. requires more explanation, etc., NAESB would supply an appropriate definition, subject to reaching consensus the definition's validity and/or appropriateness.

### Comments on Requirements (List comments by Requirement Number)

- 1.1 This section appears to be entirely unnecessary. If a BA normally operates asynchronous to an Interconnection and they establish their own time error control bands, the BA has not reason or necessity to notify the Interconnection Time Monitor of the bands being utilized, or to provide notification when they are changed. If that BA has the ability to connect with an Interconnection, then it will become subject to Interconnection rules, and thus Time Error notification upon paralleling with the Interconnection.
- 4. This section reflects manual time error correction practices in the Eastern Interconnection and ignores practices in the West whenever the WECC is not operating under Automatic Time Error control (WATEC). Add language to reflect separate Western Interconnection practices for time when the WECC is not operating under WATEC, e.g. ...“(T)ime Error Corrections shall be initiated at the

discretion of the Time Error Monitor. Notice shall be given at least 20 minutes before the time error is to start and/or stop”. The West does not have any prohibition against initiating manual time error corrections during certain hours of any day, and it should remain that way.

- 5 West manual time error corrections will be initiated at + or – 5 seconds, not 2.
- 10 should begin with the statement...”(A)ny Reliability Coordinator in an Interconnection shall have the authority to terminate a manual time error correction in progress, or a scheduled manual time error correction that has not begun, for reliability considerations”. Adding this statement will allow the reader to understand how and why a “premature termination” can occur.

## General Comments

- The title of this Standard should be changed to *Manual* Time Error Correction to separate this Standard from any other type of time error correction methodology such as Automatic Time Error Correction which is part of the WECC ACE expression
- Applicability:
  - Add “Reliability Coordinators”
  - Add language to the effect that this Standard applies to all Interconnections unless an Interconnection is operating in the automatic time error correction AGC mode.

## Comment Form

# Inadvertent Interchange Version 0 Draft 3 WEQBPS-005-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:	Gordon Brown
Comments submitted on Behalf of Organization	:	CAISO
Email of Contact	:	gbrown@caiso.com
Phone Number on Contact	:	(626) 537-2788

### Comments on Definitions (List comments by Definition)

- The Definitions section contains a mismatched collection of definitions taken from various sources such as the Functional Model, NERC Terms and Policies, etc., many of which are still in the process of being updated. I suggest that in order to achieve a consistent set of definitions, we match NAESB Standards definition to the Glossary that will be incorporated in NERC Version 0 Standards. To the extent that the NERC Version 0 definition does not satisfy the need for the NAESB Standard, i.e. requires more explanation, etc., NAESB would supply an appropriate definition, subject to reaching consensus the definition's validity and/or appropriateness.

### Comments on Requirements (List comments by Requirement Number)

- 1.1.1.2 it is important to ensure that the Reliability Coordinator is aware of Inadvertent Interchange payback transaction along with the BA and TSP.
- 1.1.1.3 In the Western Interconnection, a bilateral inadvertent interchange payback of 25 MW or less does not require a NERC tag.

### Comments on Appendices (List comments by Appendix Subsection)

## General Comments

- The term “Standard” is capitalized in some cases, lower cased in others.
- This Standard should be re-named “Inadvertent Interchange **Payback**” to separate it from NERC Version 0 Standard 006 *Inadvertent Interchange*, and any other inadvertent interchange procedures and practices, such as Inadvertent Interchange accounting.
- Under “Purpose”, there is a single statement ... “(T)his standard defines the method(s) in which Inadvertent Energy is paid back.” However, in the Western Interconnection, this is not entirely true. Add some language to reflect the current process in the West, e.g. ... *“It should be recognized that this standard might not be fully applicable whenever Automatic Time Error Control is in effect in an Interconnection.”*
- Applicability. Ditto above. Perhaps something like... *“(T)his Standard applies to all NERC regions except the Western region whenever Automatic Time Error Control is in effect.”*

## Comment Form

# Time Error Version 0 Draft 3 WEQBPS-004-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name : Alan Johnson  
Comments submitted on Behalf of Organization : Mirant  
Email of Contact : alan.r.johnson@mirant.com  
Phone Number on Contact : (678) 579-3108

### Comments on Definitions (List comments by Definition)

- With the exception of Leap Second and WECCNet, all of the definitions differ from those contained within NERC's Version 0 Draft 3 Glossary. Although I would agree that the "gist" of the definitions is generally the same, I believe that the definitions should be identical to minimize confusion. Given that the terms are primarily reliability in nature and that the Version 0 concept is "no changes", NAESB should incorporate the applicable NERC definitions into this business practice.
- Proposed definition for WECCNet, which was left blank.  
WECCNet – a messaging system used by the Western Electric Coordinating Council (WECC) for use by participating utility's dispatchers and network administrators.

### Comments on Requirements (List comments by Requirement Number)

- 1.1 Current NERC policy calls for notification to the NERC Resources Subcommittee, not the Interconnection Time Monitor. In the spirit of Version 0 (i.e., no policy changes) suggest either i) substituting Interconnection Time Monitor with NERC Resources Subcommittee or ii) adding "and the NERC Resources Subcommittee" after Interconnection Time Monitor
- 7.0 Suggest replacing this standard with the following language from NERC standard BAL-004-0, R3 that reads as follows:



**“Each Balancing Authority, when requested, shall participate in a Time Error Correction by one of the following methods:”**

**7.1 Suggest replacing this standard with the following language from NERC standard BAL-004-0, R3.1 which reads as follows:**

**“The Balancing Authority shall offset its frequency schedule by 0.02 Hertz, leaving the Frequency Bias Setting normal; or”**

**7.2 Suggest replacing this standard with the following language from NERC standard BAL-004-0, R3.2 which reads as follows:**

**“The Balancing Authority shall offset its Net Interchange Schedule (MW) by an amount equal to the computed bias contribution during a 0.02 Frequency Deviation (i.e., 20% of the Frequency Bias Setting).”**

## **General Comments**

NERC reliability standard BAL-004-0, Time Error Correction, requirement R2, references this NAESB business practice. As such, it should be compatible with the NERC standard and existing NERC policy (Policy 1D). Acceptance of the changes proposed above will meet that objective.

Thank you for the opportunity to comment

## Comment Form

# ACE Special Cases Version 0 Draft 3 WEQBPS-003-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name : Alan Johnson  
Comments submitted on Behalf of Organization : Mirant  
Email of Contact : alan.r.johnson@mirant.com  
Phone Number on Contact : (678) 579-3108

### Comments on Definitions (List comments by Definition)

Suggest that the definitions of the following terms should be modified to match the definitions contained within NERC's Glossary of Terms Used in Reliability Standards, Version 0-Draft 3:  
Area Control Error (ACE), Balancing Authority (BA), Balancing Authority Area, Dynamic Schedule, Interchange Schedule, Interconnection, and Pseudo-Tie.

Believe that the use of identical terms would minimize confusion.

### Comments on Requirements (List comments by Requirement Number)

- 1.2.2 Please replace "actual tie flows" with "Net Interchange Schedule".
- 3.1.1 Please replace "Balancing Authority" with "Balancing Authority Area".
- 3.1.2 Please replace "Balancing Authority" with "Balancing Authority Area".
- 3.1.3 Please replace "Balancing Authority" with "Balancing Authority Area".

### Comments on Appendices (List comments by Appendix Subsection)

- Looks good. Consistent with examples found in the existing policy (Policy 1, Appendix 1A, section B)

## General Comments

## Comment Form

# Inadvertent Interchange Version 0 Draft 3 WEQBPS-005-000

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### Contact Information (Must be Provided)

Contact Name	: Alan Johnson
Comments submitted on Behalf of Organization	: Mirant
Email of Contact	: alan.r.johnson@mirant.com
Phone Number on Contact	: (678) 579-3108

### Comments on Definitions (List comments by Definition)

- Consideration should be given to matching defined terms to those within NERC's Glossary of Terms Used in Reliability Standards-Draft 3. Specifically referring to the definitions for Area Control Error (ACE), Balancing Authority (BA), Balancing Authority Area, Interchange Schedule, and Interconnection.
- Suggest replacement of "CPS" and its definition with the following: "Control Performance Standard (CPS) – The reliability standard that sets the limits of a Balancing Authority's Area Control Error over a specified time period."
- In the definition of Inadvertent Interchange should capitalize the first letter of "Net Actual Interchange" and "Net Scheduled Interchange", as they are defined terms.

### Comments on Requirements (List comments by Requirement Number)

- 1.1.1 NERC Policy 1.F.5.1.1, from which this requirement is taken, refers the user to Policy 3 for Interchange Scheduling Requirements. This requirement makes no reference to the appropriate NERC standard or NAESB business practice that has been translated from the relevant portion(s) of NERC Policy 3. As such, the proposed requirement appears to be incomplete without this important detail. The complication here is that the relevant sections are spread over several NERC standards and NAESB business practices.

**1.1.1.2 NERC Policy 1.F.5.1.1.2, from which this requirement is taken, notes that the agreement on a schedule must be in accordance with NERC Policy 3. This requirement makes no reference to the appropriate NERC standard or NAESB business practice that is comparable to the relevant portion of Policy 3. As such, the proposed requirement appears to be incomplete without this important detail. The proper reference may be NERC standard INT-003-0, Interchange Transaction Implementation.**

**Comments on Appendices (List comments by Appendix Subsection)**

- Looks good. Taken verbatim from existing NERC policy (Policy 1, Appendix 1F.C)

**General Comments**

## Comment Form

# Coordinate Interchange Version 0 Draft 3 WEQBPS-002-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name : Alan Johnson  
Comments submitted on Behalf of Organization : Mirant  
Email of Contact : alan.r.johnson@mirant.com  
Phone Number on Contact : (678) 579-3108

### Comments on Definitions (List comments by Definition)

Several terms are listed that are also in the NERC glossary. Because they are i) primarily reliability related terms and ii) the business practice is linked to several NERC standards, suggest utilizing the NERC definition. The terms are as follows: Balancing Authority (BA), Balancing Authority Area, Interconnection, Load-Serving Entity (LSE), Purchasing-Selling Entity (PSE), Reliability Coordinator (RC), Sink Balancing Authority and Source Balancing Authority.

### Comments on Requirements (List comments by Requirement Number)

- 1.3 Believe the reference should be to NERC Version 0 Standard INT-001-0, Attachment 1-INT-001-0.
- 1.6 Believe the reference should be to NERC Version 0 Standard INT-001-0, Attachment 1-INT-001-0.
- 2.1 Do we really mean, “defer” here? The requesting PSE may certainly “delegate” the task to the Market Operator, but it shouldn’t be able to defer its responsibility to another entity.
- 6.0 Question whether this requirement is really a Version 1 issue. Current NERC Policy 3, section 2.3 states that the tag should be submitted in the format established by each

**Interconnection. For the Eastern Interconnection, such format is described in the Electronic Tagging Functional Specification. For ERCOT the process is described in the ERCOT Reference Document. Couldn't find support for the proposed business practice in current policy.**

- 7.1 Believe the reference should be to NERC Version 0 Standard INT-004-0, Attachment 1-INT-004-0.**
- 8.1 Believe the reference should be to NERC Version 0 Standard INT-004-0, Attachment 1-INT-004-0**

## **Comments on Appendices (List comments by Appendix Subsection)**

### **Appendix A**

- **Interchange Transaction where the sink is in the Eastern Interconnection**
  - **Current policy calls for the PSE to communicate tag information either by fax or telephone to all WECC BAs and TPs on the transaction path (see NERC Appendix 3A2 part B). Was this intentionally left out of the proposed requirement (first bullet) based upon known practices?**
  - **References to NERC's Version 0, Attachment 010-1 should be Standard INT-001-0, Attachment 1-INT-001-0.**
- **Interchange Transaction where the sink is in the Western Interconnection**
  - **Under current policy (see NERC Appendix 3A2, part B), the requirement listed under the first bullet pertains to Pre-Scheduled transactions only. Was the requirement modified based upon known practices or is this an oversight?**
  - **For the requirements listed under the first two bullets, current NERC policy calls for the PSE to communicate tag information either by fax or telephone to all WECC BAs and TPs on the transaction path (see NERC Appendix 3A2 part B). Was this intentionally left out of the proposed requirement (first bullet) based upon known practices?**
  - **References to NERC's Version 0, Attachment 010-1 should be Standard INT-001-0, Attachment 1-INT-001-0.**

### **Appendix C**

- **Why was GPE replaced with PSE in this appendix? Doesn't this change take away a right that an entity has today? If so, isn't that a Version 1 issue?**

**Appendix D**

- **Part A, section 1.1 – Is there such a thing as a MRD Transaction anymore? I thought NERC suspended that program about a year ago.**

- 

<b>General Comments</b>
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## Comment Form

# Time Error Version 0 Draft 3 WEQBPS-004-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

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Email of Contact	: <a href="mailto:wsmith1@alleghenypower.com">wsmith1@alleghenypower.com</a>
Phone Number on Contact	: (724) 838-6552

### Comments on Definitions (List comments by Definition)

WECCNet – The term was added to the definition section but the definition was omitted.

### Comments on Requirements (List comments by Requirement Number)

### General Comments

## Comment Form

# Coordinate Interchange Version 0 Draft 3 WEQBPS-002-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

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Phone Number on Contact	: (724) 838-652

### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

Requirements 1.3, 1.6, and 7.1 - References to the timing requirements in NERC Standards should be updated to the latest Version 0 numbering scheme.

### Comments on Appendices (List comments by Appendix Subsection)

Appendix A Subsection B

References to the timing requirements in NERC Standards should be updated to the latest Version 0 numbering scheme.

### General Comments

## Comment Form

# Overall Comment Version 0 Draft 3 WEQBPS-003-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

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Comments submitted on Behalf of Organization	:Duke Energy
Email of Contact	:ofrazier@duke-energy.com
Phone Number on Contact	:704-382-6964

### Comments on Definitions (List comments by Definition)

Duke Energy is concern with Version '0' being adopted by FERC as the final business standard and FERC ordering Version '0' to be included in future tariffs without giving NAESB adequate time to modify these standards to reflect current processes and practices that may have changed since the last NERC operating policies were adopted.

### Comments on Requirements (List comments by Requirement Number)

### General Comments

## Comment Form

# ACE Special Cases Version 0 Draft 3 WEQBPS-003-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name : Ed Davis  
Comments submitted on Behalf of Organization : Entergy Services, Inc  
Email of Contact : edavis@entergy.com  
Phone Number on Contact : 504-310-5884

### Comments on Definitions (List comments by Definition)

**This NAESB Standard has many defined terms that have the same name as terms defined in the NERC Version 0 Standards Glossary. However, the definitions of these terms are different in the NAESB Standards than those same terms in the NERC V0 Glossary. The NAESB drafting teams did not have access to the NERC defined terms until NERC recently issued its V0 Glossary.**

**The industry potentially has terms defined by NAESB and NERC with different definitions which will lead to more confusion in the industry. For instance, the definition of “Reliability Coordinator” is very different in the NAESB Standards and the NERC V0 Glossary.**

**There is also the case that NAESB and NERC have different defined terms with the same meaning, word for word.**

#### NAESB TLR Standard

**Reliability Area** - The collection of generation, transmission, and loads within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

#### NERC V0 GLOSSARY

**Reliability Coordinator Area** - The collection of generation, transmission, and loads

within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

**Therefore, Entergy strongly suggests those terms defined by NERC not be included in the NAESB Standards. However, if NAESB does include the NERC defined terms they should be included in NAESB Standards as reference only with specific wording that these terms are defined by NERC.**

**Specifically, we suggest NAESB delete from this Standard the following NERC defined terms:**

**Area Control Error  
Balancing Authority  
Balancing Authority Area  
Dynamic Schedule  
Interchange Schedule  
Interconnection  
Net Actual Interchange  
Net Interchange Schedule  
Pseudo-Tie  
Supplemental Regulation Service**

**Comments on Requirements (List comments by Requirement Number)**

None

**Comments on Appendices (List comments by Appendix Subsection)**

None

**General Comments**

None

## Comment Form

# Coordinate Interchange Version 0 Draft 3 WEQBPS-002-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	: Ed Davis
Comments submitted on Behalf of Organization	: Entergy Services, Inc.
Email of Contact	: edavis@entergy.com
Phone Number on Contact	: 504-310-5884

### Comments on Definitions (List comments by Definition)

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**The industry potentially has terms defined by NAESB and NERC with different definitions which will lead to more confusion in the industry. For instance, the definition of “Reliability Coordinator” is very different in the NAESB Standards and the NERC V0 Glossary.**

**There is also the case that NAESB and NERC have different defined terms with the same meaning, word for word.**

#### NAESB TLR Standard

**Reliability Area** - The collection of generation, transmission, and loads within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

#### NERC V0 GLOSSARY

**Reliability Coordinator Area** - The collection of generation, transmission, and loads within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

Therefore, Entergy strongly suggests those terms defined by NERC not be included in the NAESB Standards. However, if NAESB does include the NERC defined terms they should be included in NAESB Standards as reference only with specific wording that these terms are defined by NERC.

Specifically, we suggest NAESB delete from this Standard the following NERC defined terms:

- Balancing Authority
- Balancing Authority Area
- Interchange Schedule
- Interchange Transaction
- Interchange Transaction Tag
- Interconnection
- Load-Serving Entity
- Purchasing-Selling Entity
- Reliability Coordinator
- Sink Balancing Authority
- Source Balancing Authority
- Transmission Service Provider

**Comments on Requirements (List comments by Requirement Number)**

None

**Comments on Appendices (List comments by Appendix Subsection)**

None

**General Comments**

None

## Comment Form

# Inadvertent Interchange Version 0 Draft 3 WEQBPS-005-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

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Comments submitted on Behalf of Organization : Entergy Services, Inc.  
Email of Contact : edavis@entergy.com  
Phone Number on Contact : 504-310-5884

### Comments on Definitions (List comments by Definition)

This NAESB Standard has many defined terms that have the same name as terms defined in the NERC Version 0 Standards Glossary. However, the definitions of these terms are different in the NAESB Standards than those same terms in the NERC V0 Glossary. The NAESB drafting teams did not have access to the NERC defined terms until NERC recently issued its V0 Glossary.

The industry potentially has terms defined by NAESB and NERC with different definitions which will lead to more confusion in the industry. For instance, the definition of “Reliability Coordinator” is very different in the NAESB Standards and the NERC V0 Glossary.

There is also the case that NAESB and NERC have different defined terms with the same meaning, word for word.

#### NAESB TLR Standard

**Reliability Area** - The collection of generation, transmission, and loads within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

#### NERC V0 GLOSSARY

**Reliability Coordinator Area** - The collection of generation, transmission, and loads



within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

**Therefore, Entergy strongly suggests those terms defined by NERC not be included in the NAESB Standards. However, if NAESB does include the NERC defined terms they should be included in NAESB Standards as reference only with specific wording that these terms are defined by NERC.**

**Specifically, we suggest NAESB delete from this Standard the following NERC defined terms:**

**Area Control Error  
Balancing Authority  
Balancing Authority Area  
Control Performance Standard – CPS  
Inadvertent Interchange  
Interchange Schedule  
Interconnection  
Transmission Service Provider**

**Comments on Requirements (List comments by Requirement Number)**

**Comments on Appendices (List comments by Appendix Subsection)**

**General Comments**

It is stated in this draft Standard that it applies to “all NERC regions”. However, all the other NAESB Standards state the types of entities to whom the NAESB Standard applies. Therefore, we suggest adding Balancing Authorities and Transmission Service Providers to the Applicability section of this Standard.

## Comment Form

# Time Error Version 0 Draft 3 WEQBPS-004-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

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Comments submitted on Behalf of Organization : Entergy Services, Inc.  
Email of Contact : edavis@entergy.com  
Phone Number on Contact : 504-310-5884

### Comments on Definitions (List comments by Definition)

**This NAESB Standard has many defined terms that have the same name as terms defined in the NERC Version 0 Standards Glossary. However, the definitions of these terms are different in the NAESB Standards than those same terms in the NERC V0 Glossary. The NAESB drafting teams did not have access to the NERC defined terms until NERC recently issued its V0 Glossary.**

**The industry potentially has terms defined by NAESB and NERC with different definitions which will lead to more confusion in the industry. For instance, the definition of “Reliability Coordinator” is very different in the NAESB Standards and the NERC V0 Glossary.**

**There is also the case that NAESB and NERC have different defined terms with the same meaning, word for word.**

#### NAESB TLR Standard

**Reliability Area** - The collection of generation, transmission, and loads within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

#### NERC V0 GLOSSARY

**Reliability Coordinator Area** - The collection of generation, transmission, and loads

within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

**Therefore, Entergy strongly suggests those terms defined by NERC not be included in the NAESB Standards. However, if NAESB does include the NERC defined terms they should be included in NAESB Standards as reference only with specific wording that these terms are defined by NERC.**

**Specifically, we suggest NAESB delete from this Standard the following NERC defined terms:**

**Balancing Authority  
Balancing Authority Area  
Frequency Bias Setting  
Interchange Schedule  
Interconnection  
Time Error  
Time Error Correction**

**Also, there is no definition of WECCNet. Please include a definition or delete this word from the definition list.**

**Comments on Requirements (List comments by Requirement Number)**

None.

**General Comments**

## Comment Form

# TLR Version 0 Draft 3 WEQBPS-006-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

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Email of Contact	: edavis@entergy.com
Phone Number on Contact	: 504-310-5884

### Comments on Definitions (List comments by Definition)

**This NAESB Standard has many defined terms that have the same name as terms defined in the NERC Version 0 Standards Glossary. However, the definitions of these terms are different in the NAESB Standards than those same terms in the NERC V0 Glossary. The NAESB drafting teams did not have access to the NERC defined terms until NERC recently issued its V0 Glossary.**

**The industry potentially has terms defined by NAESB and NERC with different definitions which will lead to more confusion in the industry. For instance, the definition of “Reliability Coordinator” is very different in the NAESB Standards and the NERC V0 Glossary.**

**There is also the case that NAESB and NERC have different defined terms with the same meaning, word for word.**

#### NAESB TLR Standard

**Reliability Area** - The collection of generation, transmission, and loads within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

#### NERC V0 GLOSSARY

**Reliability Coordinator Area** - The collection of generation, transmission, and loads within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

**Therefore, Entergy strongly suggests those terms defined by NERC not be included in the NAESB Standards. However, if NAESB does include the NERC defined terms they should be included in NAESB Standards as reference only with specific wording that these terms are defined by NERC.**

**Specifically, we suggest NAESB delete from this Standard the following NERC defined terms:**

**Balancing Authority  
Balancing Authority Area  
Constrained Facility  
Contract Path  
Curtailed Threshold  
Firm Transmission Service  
Generator to Load Distribution Factor (GLDF)  
Interchange Distribution Calculator (IDC)  
Interchange Transaction  
Interchange Transaction Tag (Tag)  
Interconnection  
Interconnection Reliability Operating Limit (IROL)  
Load Shift Factor (LSF)  
Native Load  
NERC  
Network Integration Transmission Service  
Non-Firm Transmission Service  
Point-to-Point Transmission Service  
Purchasing-Selling Entity  
Reliability Coordinator Information Service  
Reallocation  
Reliability Area (same definition as Reliability Coordinator Area)  
Reliability Coordinator  
Sink Balancing Authority  
System Operating Limit  
Transfer Distribution Factor  
Transmission Customer  
Transmission Loading Relief  
Transmission Operator  
Transmission Service  
Transmission Service Provider**

Other defined terms are so close it is hard to tell the difference, and is the difference material to the industry. For instance, this Standard includes the definition

### **NAESB Defined Term**

**Generation Shift Factor (GSF)** – A factor to be applied to a generator’s expected change in output to determine the amount of flow contribution that change in output will impose on an identified transmission facility or monitored flowgate.

### **NERC Defined Term**

**Generator Shift Factor (GSF)** - A factor to be applied to a generator’s expected change in output to determine the amount of flow contribution that change in output will impose on an identified transmission facility or Flowgate.

The only difference between a NAESB “Generation Shift Factor” and a NERC Generation Shift Factor is whether a flowgate is a “monitored flowgate” (NAESB) or an unmonitored “Flowgate” (NERC).

Also note both defined terms use the same acronym “GSF”. When the industry sees “GSF” should they use the NAESB or NERC interpretation?

<b>Comments on Requirements (List comments by Requirement Number)</b>
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None

<b>Comments on Appendices (List comments by Appendix Subsection)</b>
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None

<b>General Comments</b>
-------------------------

None

## Comment Form

# Time Error Version 0 Draft 3 WEQBPS-004-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

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Review Committee  
Email of Contact : [ktammar@nyiso.com](mailto:ktammar@nyiso.com)  
Phone Number on Contact : 518.356.6205

### Comments on Definitions (List comments by Definition)

- The Definitions section contains a mismatched collection of definitions taken from various sources such as the Functional Model, NERC Terms and Policies, etc., many of which are still in the process of being updated. In order to achieve a consistent set of definitions, matching NAESB Standards definitions to the Glossary that will be incorporated in NERC Version 0 Standards would eliminate duplication. To the extent that a NERC Version 0 definition does not satisfy the NAESB Standard's need, i.e. requires more explanation, etc., NAESB could supply an appropriate definition, subject to reaching consensus on the definition's validity and/or appropriateness.

### Comments on Requirements (List comments by Requirement Number)

- 1.1 If a BA normally operates asynchronous to an Interconnection and they establish their own time error control bands, the BA has no reason or necessity to notify the Interconnection Time Monitor of the bands being utilized, or to provide notification when they are changed. If that BA has the ability to connect with an Interconnection, then it will become subject to Interconnection rules of that region, and thus Time Error notification upon paralleling with the Interconnection.
- 4. This section reflects manual time error correction practices in the Eastern Interconnection and ignores regional practices in the West whenever the WECC is not operating under Automatic Time Error control (WATEC).
- The IRC is concerned about the impact of this standard on the regional diversity and the varying requirements that exist at this time.

## **General Comments**

The IRC is concerned that the development of NAESB Version 0 Business Practices has resulted in requirements that have a greater impact on reliability requirements than anticipated when the JIC made its original assignment to NAESB. It may not be the intent for these NAESB Business Practices to impact reliability any more than was considered by the JIC but it is impossible to understand any business practice's impact on reliability until details of the requirements are known. In addition, certain NAESB Ver 0 Business Practices are conflicting with requirements and procedures that are currently specified and developed by Regional Reliability Councils (RRC). These NAESB standards, though intended to specify requirements for continental business practices, have an integral effect on how RRCs meet reliability requirements. As such, the IRC recommends that NAESB review its proposed Business Practices to ensure Version 0 Business Practices do not conflict with RRC requirements and negatively impact reliability.



## Comment Form

# Coordinate Interchange Version 0 Draft 3 WEQBPS-002-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

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Comments submitted on Behalf of Organization	:ISO-RTO Council – Standards Review Committee
Email of Contact	:Ktammar@nyiso.com
Phone Number on Contact	: 518-356-6205

### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

### Comments on Appendices (List comments by Appendix Subsection)

Appendix A - Interchange Transaction Tagging Between Interconnections, Section A – Between ERCOT and Eastern Interconnections.

Requirements for coordination of ATC across the DC tie between SPP and ERCOT do not reflect the current practices as provided for in filed SPP tariffs and procedures. ISO-RTO Council (“IRC”) concurs with SPP’s previously provided individual comments to Draft 2 to make appropriate changes to this section. We are aware of the specific directive of the Version 0 drafting initiative the Business Practices Subcommittee is operating under which does not allow for any changes to the existing NERC requirements. However, the IRC does not support the establishment of standards which employ practices that are known

**to be out of date. It is the IRC's understanding that NASEB elected not to include an out-of date ERCOT transaction curtailment process from NERC Policy 9 as part of the NAESB TLR Business Practice. NAESB also elected not to include the WECC transaction curtailment process in the NAESB TLR Business Practice because it was not consistent to be included as a continental business standard.**

**The requirements in Appendix A are also regional in nature and apply only between transactions across the ERCOT and SPP borders. We believe it is inappropriate for NAESB to include these regional ATC procedures in a continental standard for Coordinate Interchange.**

**For these reasons, the IRC requests NAESB to remove Appendix A from the Version 0 Coordinate Interchange standard. Any additional business requirements for coordinate interchange between ERCOT and SPP can be requested as Version 1 changes in the future.**

## **General Comments**

The IRC is concerned that the development of NAESB Version 0 Business Practices has resulted in requirements that have a greater impact on reliability requirements than anticipated when the JIC made its original assignment to NAESB. It may not be the intent for these NAESB Business Practices to impact reliability any more than was considered by the JIC but it is impossible to understand any business practice's impact on reliability until details of the requirements are known. In addition, certain NAESB Ver 0 Business Practices are conflicting with requirements and procedures that are currently specified and developed by Regional Reliability Councils (RRC). These NAESB standards, though intended to specify requirements for continental business practices, have an integral effect on how RRCs meet reliability requirements. As such, the IRC recommends that NAESB review its proposed Business Practices to ensure Version 0 Business Practices do not conflict with RRC requirements and negatively impact reliability.

## Comment Form

# Inadvertent Interchange Version 0 Draft 3 WEQBPS-005-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:	Karl Tammar
Comments submitted on Behalf of Organization	:	ISO RTO Council - SRC
Email of Contact	:	ktammar@nyiso.com
Phone Number on Contact	:	518.356.6205

### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

- 1.1.1.3 In the Western Interconnection, a bilateral inadvertent interchange payback of 25 MW or less does not require a NERC tag. Noting the regional differences.

### Comments on Appendices (List comments by Appendix Subsection)

### General Comments

The IRC is concerned that the development of NAESB Version 0 Business Practices has resulted in requirements that have a greater impact on reliability requirements than anticipated when the JIC made its original assignment to NAESB. It may not be the intent for these NAESB Business Practices to impact reliability any more than was considered by the JIC but it is impossible to understand any business practice's impact on reliability until details of the requirements are known. In addition, certain NAESB Ver 0 Business Practices are conflicting with requirements and procedures that are currently specified and developed by Regional Reliability Councils (RRC). These NAESB standards, though intended to specify

**requirements for continental business practices, have an integral effect on how RRCs meet reliability requirements. As such, the IRC recommends that NAESB review its proposed Business Practices to ensure Version 0 Business Practices do not conflict with RRC requirements and negatively impact reliability.**

## Comment Form

# ACE Special Cases Version 0 Draft 3 WEQBPS-003-000

Posted October 25, 2004 – November 25, 2004  
Please submit comment form by November 25, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

### Contact Information (Must be Provided)

Contact Name	:	Karl Tammar
Comments submitted on Behalf of Organization	:	ISO RTO Council - SRC
Email of Contact	:	ktammar@nyiso.com
Phone Number on Contact	:	518.356.6205

### Comments on Definitions (List comments by Definition)

### Comments on Requirements (List comments by Requirement Number)

### Comments on Appendices (List comments by Appendix Subsection)

### General Comments

The ACE expression is innately linked to physical generator movement, actual interchange flow, and grid reliability. The requirements in this business practice are regional in nature and apply to the Regional Councils that are responsible for determining the ACE methodology and coordinating such methodology among the Control Areas/Balancing Authorities within that Region.

The IRC is concerned that the development of NAESB Version 0 Business Practices has resulted in requirements that have a greater impact on reliability requirements than anticipated when the JIC

made its original assignment to NAESB. It may not be the intent for these NAESB Business Practices to impact reliability any more than was considered by the JIC but it is impossible to understand any business practice's impact on reliability until details of the requirements are known. In addition, certain NAESB Ver 0 Business Practices are conflicting with requirements and procedures that are currently specified and developed by Regional Reliability Councils (RRC). These NAESB standards, though intended to specify requirements for continental business practices, have an integral effect on how RRCs meet reliability requirements. As such, the IRC recommends that NAESB review its proposed Business Practices to ensure Version 0 Business Practices do not conflict with RRC requirements and negatively impact reliability.

**Comment Form**

**Inadvertent Interchange**

**Version 0 Draft 3**

**WEQBPS-005-000**

Posted October 25, 2004 – November 29, 2004  
Please submit comment form by November 29, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

**Contact Information (Must be Provided)**

Contact Name	: Linda Horn
Comments submitted on Behalf of Organization	: Wisconsin Electric Power Company (d/b/a : We Energies)
Email of Contact	: linda.horn@we-energies.com
Phone Number on Contact	: 414-221-2274

**Comments on Definitions (List comments by Definition)**

All terms and their definitions should be identical to NERC approved definitions for those terms. Any terms not covered in the NERC Glossary should be defined in the NAESB Glossary and that definition should be carried throughout all the standards.

**Comments on Requirements (List comments by Requirement Number)**

**Line 54, Section 1.1 Energy “in-kind” payback** – This should include the fact that NERC issued waivers that allow financial payback for inadvertent energy. The Midwest ISO will hold an inadvertent waiver for the energy markets that are scheduled to commence on March 1, 2005.

**Line 75, Section 1.2 Other payback methods** – NERC Version 0 accommodates waivers for alternate methods; this standard should also. Should agreement be granted from all zones (areas) within a footprint of the ISO?RTO? How would NAESB grant waivers for other payback mechanisms? Is there a process?

**Comments on Appendices (List comments by Appendix Subsection)**

**General Comments**

**Comment Form**  
**Time Error**  
**Version 0 Draft 3**  
**WEQBPS-004-000**

Posted October 25, 2004 – November 29, 2004  
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Phone Number on Contact	: 414-221-2274

**Comments on Definitions (List comments by Definition)**

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**Line 50, WECCNet** – missing definition

**Comments on Requirements (List comments by Requirement Number)**

**General Comments**



**Comment Form**  
**TLR**  
**Version 0 Draft 3**  
**WEQBPS-006-000**

Posted October 25, 2004 – November 29, 2004  
Please submit comment form by November 29, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

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Email of Contact	: linda.horn@we-energies.com
Phone Number on Contact	: 414-221-2274

**Comments on Definitions (List comments by Definition)**

All terms and their definitions should be identical to NERC approved definitions for those terms. Any terms not covered in the NERC Glossary should be defined in the NAESB Glossary and that definition should be carried throughout all the standards.

**Comments on Requirements (List comments by Requirement Number)**

**Comments on Appendices (List comments by Appendix Subsection)**

**General Comments**

**Comment Form**  
**ACE Special Cases**  
**Version 0 Draft 3**  
**WEQBPS-003-000**

Posted October 25, 2004 – November 29, 2004  
Please submit comment form by November 29, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

**Contact Information (Must be Provided)**

Contact Name : Linda Horn  
Comments submitted on Behalf of Organization : Wisconsin Electric Power Company (d/b/a  
: We Energies)  
Email of Contact : linda.horn@we-energies.com  
Phone Number on Contact : 414-221-2274

**Comments on Definitions (List comments by Definition)**

All terms and their definitions should be identical to NERC approved definitions for those terms. Any terms not covered in the NERC Glossary should be defined in the NAESB Glossary and that definition should be carried throughout all the standards.

Broaden the definition of a pseudo-tie to match NERC Version 0 definition.

**Comments on Requirements (List comments by Requirement Number)**

**Line 60, Business Practice Requirements** – Include a statement that all transferred load must be metered.

**Line 137, Section 3. Load or Generation Transfer by Telemetry** – Include a statement that dynamic scheduling or pseudo-ties can be used for telemetered transfer of load or generation from one BA to another.

**Line 63, Section 1. Jointly Owned Units** – Use the terminology from NERC Version 0 - Jointly owned units (JOU) must be accounted for properly by all owners. The following examples illustrate the methodology. CONTROL AREA X and CONTROL AREA Y each have a unit in their CONTROL AREA Jointly owned by both CONTROL AREAS. Unit 1 is in CONTROL AREA X and unit 2 is in CONTROL AREA Y. The ACE equation for CONTROL AREA X must reflect its ownership of both units. Two components are required: one to reflect X's ownership in unit 2 and one to reflect Y's ownership of unit 1. CONTROL AREA Y's ACE equation will likewise have two components, one for its ownership in unit 1 and one for X's ownership of unit 2. If fixed schedules aren't used, JOUs may be handled as a pseudo-tie or a dynamic schedule.

**Comments on Appendices (List comments by Appendix Subsection)**

**General Comments**

**Comment Form**

**Coordinate Interchange**

**Version 0 Draft 3**

**WEQBPS-002-000**

Posted October 25, 2004 – November 29, 2004  
Please submit comment form by November 29, 2004 to:  
<mailto:naesb@naesb.org>, fax: 713-356-0067

**Contact Information (Must be Provided)**

Contact Name	: Linda Horn
Comments submitted on Behalf of Organization	: Wisconsin Electric Power Company (d/b/a : We Energies)
Email of Contact	: linda.horn@we-energies.com
Phone Number on Contact	: 414-221-2274

**Comments on Definitions (List comments by Definition)**

All terms and their definitions should be identical to NERC approved definitions for those terms. Any terms not covered in the NERC Glossary should be defined in the NAESB Glossary and that definition should be carried throughout all the standards.

**Comments on Requirements (List comments by Requirement Number)**

**Line 14** – Applicability – Include a statement for the exemption that the Midwest ISO does the source and sink scheduling. Need to recognize the NERC Enhanced Scheduling waiver for Midwest ISO. In the Midwest ISO footprint, the Balancing Authority handles only two types of schedules - dynamic schedules and carved-out grandfathered agreements.

**Line 415** – incorrect spelling of the word “entity”

**Line 437 to 438** – This statement is incorrect. NERC policy states that if a communication failure with a neighboring CA is experienced, both CA’s control to the last known good interchange schedule. Also, this is a reliability statement and should be addressed by NERC, not NAESB business practices.

**Line 453** – Reports – Add a sentence to the end of the paragraph in Lines 454-456 that states, “The reports are Net Exchange, Schedule Detail, Reservation Usage and Recovery Process and are described below.” Also include the frequency that each report should be completed.

**Comments on Appendices (List comments by Appendix Subsection)**

**General Comments**

## **APPENDIX IV: Ratification Ballots and Results**

Recommended standards adopted by the NAESB WEQ EC and the corresponding ratification ballots sent to the WEQ membership, including ratification ballot results and comments submitted by WEQ members during the ratification process.

Ballots for the following dates:

Ballot distributed on March 8, 2004 for WEQ EC actions taken on February 24, 2004\*

Ballot distributed on November 19, 2004 for WEQ EC actions taken on November 16, 2004

Ballot distributed on December 1, 2004 for WEQ EC actions taken on November 30, 2004

Ratification Ballot results for:

Ballot distributed on March 8, 2004 and returned on April 7, 2004

Ballot distributed on November 19, 2004 and returned on December 30, 2004

Ballot distributed on December 1, 2004 and returned on December 31, 2004

Comments submitted during the ratification process.

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\* The attachment to Recommendation R04005, which is included as part of this ratification ballot, has not been included in this appendix due to its size, but is available for download from the NAESB web site. Please contact the NAESB office (713-356-0060 or [naesb@naesb.org](mailto:naesb@naesb.org)) for assistance in locating the document.



## North American Energy Standards Board

1301 Fannin, Suite 2350, Houston, Texas 77002

Phone: (713) 356-0060, Fax: (713) 356-0067, E-mail: [naesb@naesb.org](mailto:naesb@naesb.org)

Home Page: [www.naesb.org](http://www.naesb.org)

---

**via email**

**TO:** NAESB Wholesale Electric Quadrant Members  
**FROM:** Todd Oncken, Deputy Director  
**RE:** Member Ratification of Standards Adopted by the Wholesale Electric Quadrant of the Executive Committee  
**DATE:** March 8, 2004

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Please find the attached ballot to record your vote on the ratification of a recommendation approved by the Executive Committee on February 24, 2004. The draft minutes for this meeting are available on the NAESB web site, and the recommendation is attached to the ballot. To record your vote, please fill out page two of this communication and either email ([naesb@naesb.org](mailto:naesb@naesb.org)) or fax it (713-356-0067) to our office by April 7, 2004. Should the recommendation be ratified, it will be available for use as a final action prior to publication of NAESB WEQ standards.

The EC voting record and discussion on this item is contained within the EC minutes of February 24, 2004. Links to the EC minutes, request, and related subcommittee and task force minutes can be found on the NAESB WEQ main page (<http://www.naesb.org/weq/default.asp>). The recommendation and an attachment containing supporting documentation for the recommendation can be found on the Member Ratification of Standards and Board Actions page of the NAESB web site (<http://www.naesb.org/ratification.asp>). The attachment to the recommendation was not distributed due to size considerations – it is in excess of 300 pages. Transcripts of the EC meeting where this recommendation was discussed can be ordered by calling the NAESB office – 713-356-0060.

Please feel free to call the NAESB office if you have any difficulty retrieving any of this information.

Best Regards,

*Todd Oncken*

cc: Rae McQuade, Executive Director

---



# North American Energy Standards Board

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Home Page: [www.naesb.org](http://www.naesb.org)

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**NAESB Membership Ratification Ballot for Wholesale Electric Quadrant Standards  
Due March 8, 2004  
To NAESB Office (Fax Number 713-356-0067, email [naesb@naesb.org](mailto:naesb@naesb.org))**

Please vote in favor of or in opposition to the Executive Committee (EC) action taken on February 24, 2004:

Support	Oppose	Recommendation for Request No.:
		<b>R04005 (OASIS Baseline):</b> Adopt the current Business Practice Standards and Communication Protocols for Open Access Same-Time Information System (OASIS) adopted in FERC Orders 605, 638 and 889 as NAESB standards.

Member Name:	_____
Member Signature:	_____
Member Company:	_____
Segment:	_____
Date:	_____

---



# North American Energy Standards Board

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## NAESB Wholesale Electric Quadrant Members as of March 8, 2004

<b>NAESB WEQ Member</b>	<b>Member Contact</b>
ACES Power Marketing LLC	Roy J. True
Alabama Electric Cooperative, Inc.	Kenneth J. Skroback
American Electric Power Marketing, Inc.	Barbara Radous, Joseph Hartsoe
American Electric Power Service Corp.	Thomas Ringenbach
American Electric Power Service Corp.	John Stough, Michael Desselle
American Municipal Power - Ohio, Inc.	Pat Frazier, Chris Norton
American Transmission Company LLC	Julie Voeck
Arizona Public Service Company	Mark W. Hackney
Arkansas Electric Cooperative Corporation	Ricky Bittle
Avista Corp.	Scott A. Waples
Baltimore Gas & Electric Company	John J. Moraski, Ralph Bourquin
Basin Electric Power Cooperative	Dan Klempel
Basin Electric Power Cooperative	David Raatz
Basin Electric Power Cooperative	Jason Doerr
Basin Electric Power Cooperative	Ted Humann
Bonneville Power Administration	Sydney D. Berwager
Bonneville Power Administration	Fran Halpin
Bonneville Power Administration	Brenda Anderson
Bonneville Power Administration	Barbara Rehman
BP America Inc.	Jeanne Zaiontz
BP Energy Company	Jeanne Zaiontz
Buckeye Power, Inc.	Peter H. Buros
Calpine Corporation	William Taylor, Jim Stanton
Cap Gemini Ernst and Young	Stephen A. Behrens
CenterPoint Energy	Paul Rocha
Central Electric Power Cooperative	Arthur Fusco
ChevronTexaco Energy Research and Technology	Carol Guthrie
Cinergy	Walt Yeager, Ron Jackups
Cinergy	Walt Yeager, Ron Jackups
Cleco Power, LLC	Keith Comeaux
Columbus Southern Power Company	Barbara Radous
Comprehensive Energy Services	Jim Templeton
Conectiv Energy Supply, Inc.	Gloria Ogenyi
Conectiv Energy Supply, Inc.	Gloria Ogenyi
Conectiv Power Delivery	Ken Gates
Constellation NewEnergy, Inc.	Sara O'Neill
Consumers Energy Company	Andrew C. Dotterweich,
Consumers Energy Company	Frank Johnson
Consumers Energy Company	Steven L. Gaarde,
Consumers Energy Company	Andrew C. Dotterweich, John J. Dellas
Dairyland Power Cooperative	Bruce Staples
Department of the Interior, Bureau of Reclamation	Deborah M. Linke
Detroit Edison	David G. Nick
Dominion Energy Marketing, Inc.	Lou Oberski
Duke Energy Corp.	Ollie Frazier
Duke Energy North America	Bill D. Blevins
Duke Energy North America	Lee Barrett
Dynegy Marketing and Trade	Jason Cox
Edison Electric Institute	David Owens, Dave Dworzak
El Paso Corporation	Dennis M. Price
El Paso Merchant Energy	Sam Beason
Electric Reliability Council of Texas (ERCOT)	Sam R. Jones
Electricity Consumers Resource Council (ELCON)	John Anderson, John Hughes

---



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---

**NAESB WEQ Member**

Empire District Electric Company, The  
Energy East Management Corporation  
Entergy Services, Inc.  
Entergy Services, Inc.  
Exelon Corporation - PECO Energy  
Exelon Generation - Power Team  
Exelon Generation Company LLC  
ExxonMobil Gas Marketing  
Florida Municipal Power Agency  
Florida Municipal Power Agency  
Florida Power & Light Company  
Florida Power & Light Company  
Georgia Transmission Corporation  
Hydro - Quebec Transenergie  
Hydro One Networks  
Indiana Municipal Power Agency  
International Transmission Company  
Maryland Peoples Counsel  
Michigan Electric Transmission Company LLC  
Michigan Public Power Agency  
Midwest Independent Transmission System Operator  
Mirant Corp.  
Missouri River Energy Services  
Modesto Irrigation District  
National Association of Regulatory Utility Commissioners  
National Grid USA  
National Rural Electric Cooperative Assoc.  
New York State Dept. of Public Service  
North Carolina Eastern Municipal Power Agency  
North Carolina Electric Membership Corporation  
North Carolina Electric Municipal Power Agency #1  
North Carolina Electric Municipal Power Agency #1  
Northeast Utilities Service Company  
  
NRG Power Marketing, Inc.  
Oglethorpe Power Corporation  
Ohio Consumers Council  
Old Dominion Electric Cooperative  
Oncor  
Ontario Power Generation  
Ontario Power Generation  
Open Access Technology International, Inc.  
PacifiCorp  
PacifiCorp  
PacifiCorp  
PacifiCorp  
PG&E National Energy Group  
  
Platte River Power Authority  
Portland General Electric  
PPL Electric Utilities Corporation  
PPM Energy, Inc.  
PPM Energy, Inc.  
Praxair, Inc.  
Progress Energy

**Member Contact**

Barry K. Warren  
Marjorie Perlman  
Edward J. Davis, John H. Zemanek  
F. Jay Poche  
John F. Leonard, Jr.  
Regina Carrado  
Regina Carrado  
Steve Sayuk  
Rick Casey  
Steven H. McElhaney  
Joe Stepenovitch  
Marty Mennes  
Carol Hester  
Victor Bissonnette  
Dave Barrie  
Dick Foltz  
Jim D. Cyrulewski  
Patricia Smith  
Charles V. Waits  
James R. Nickel, Daniel E. Cooper  
Bill Phillips  
Susann D. Felton, Alan Johnson  
Brian Zavesky  
Roger Van Hoy  
Lou Ann Westerfield  
Masheed Rosenqvist  
Barry Lawson  
William Heinrich  
Gregory Locke  
David Beam  
Clay A. Norris  
Andrew Fusco  
David Boguslawski, William P.  
McKinnon  
Steve Corneli  
Billy Ussery  
John Smart, Randy Corbin  
James N. Kimball  
Ellis Rankin  
Barry Green  
Ron Robinson  
Kevin Burns  
Alec Burden  
Edison G. Elizeh  
Greg Maxfield  
Jim Hicks, Darrell Gerrard  
Dede Hapner (no longer primary  
contact)  
Terry L. Baker  
Terri Peschka  
Ray Mammarella  
Don Winslow  
Don Winslow  
James B. Rouse, David Meade  
Benjamin Crisp

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## North American Energy Standards Board

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---

### NAESB WEQ Member

Progress Energy  
Progress Energy  
Progress Energy  
PSEG Energy Resources and Trade LLC  
PSEG Power LLC  
Public Service Electric and Gas Company  
Public Service Electric and Gas Company  
Public Utility District No. 1 of Chelan County  
Puget Sound Energy, Inc.  
Reliant Energy Services, Inc.  
Sacramento Municipal Utility District  
Salt River Project Agricultural Improvement and Power District  
Salt River Project Agricultural Improvement and Power District  
Seminole Electric Cooperative, Inc.  
Seminole Electric Cooperative, Inc.  
Southeastern Power Administration  
Southern California Edison  
Southern Company Services, Inc.  
Southern Company Services, Inc.  
Southern Company Services, Inc.  
Southern Company Services, Inc.  
Southwest Power Pool  
Southwest Transmission Cooperative, Inc.  
Southwestern Power Administration  
Southwestern Power Administration  
Sunflower Electric Power Corporation  
Tenaska, Inc.  
Tennessee Valley Authority  
Tennessee Valley Authority  
Tennessee Valley Authority  
Tennessee Valley Authority  
The Boeing Company  
TRANS-ELECT, INC.  
TRANSlink Development Company LLC  
Tri-State Generation and Transmission Association, Inc.  
Tri-State Generation and Transmission Association, Inc.  
TXU Energy Trading  
UBS Warburg Energy  
Vermont Public Power Supply Authority  
We Energies  
We Energies  
Western Area Power Administration  
Western Area Power Administration  
Wisconsin Public Power Inc.  
Wisconsin Public Service Corporation  
  
Xcel Energy Inc.

### Member Contact

Philip Lewis  
Michael Settlage  
Verne Ingersoll  
James D. Hebson  
Gregory Eisenstark  
Colin J. Loxley  
Jeffrey C. Mueller  
Doug Frazier  
George Marshall, Bob Harshbarger  
Charles Yeung  
Thomas Ingwers  
Wendy Weathers, Mark B. Bonsall  
Steve Cobb  
Lane Mahaffey  
Glenn Spurlock  
Bob Goss  
Ronald D. Nunnally  
Gary Rozier, Jim Miller, Greg Butrus  
Tony A. Reed  
Joel Dison  
R.D. (Dean) Ulch, John Lucas  
Carl Monroe  
Larry D. Huff  
Forrest E. Reeves  
Stanley L. Mason  
L. Christian Hauck, Carroll Waggoner  
Scott Helyer  
Ron L. Owens  
William F. Irish  
Jim Ingraham  
Mitchell Needham, W. Terry Boston  
Steve LaFond  
Paul D. McCoy  
Audrey Zibelman  
Bruce Sembrick  
Thomas A. Smith  
Brad Jones, Jeff Shorter  
Suzanne Calcagno  
William J. Gallagher  
Linda Horn  
James R. Keller  
Mark Fidrych  
Jeffrey Ackerman  
Mike Stuart  
William Bourbonnais, Charles W.  
Severance  
Steven J. Beuning

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**RECOMMENDATION TO NAESB WEQ EXECUTIVE COMMITTEE**

**Requester:** Southern Company Services

**Request No.:** R04005

**Date:** December 29, 2003

**Revised by the Executive Committee on February 24, 2004**

**1. Action:**

- Accept as requested
- Accept as modified below
- Decline
- Change to Existing Practice
- Status Quo

**2. TYPE OF MAINTENANCE**

**Per Request:**

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

- Initiation
- Modification
- Interpretation
- Withdrawal
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:**

Accept as requested the current Business Practice Standards and Communication Protocols for Open Access Same-Time Information System (OASIS) adopted in FERC Orders 605, 638 and 889.

**STANDARDS LANGUAGE:**

**Section 2 Standard Terminology for Transmission and Ancillary Services**

**Section 2.1 Attribute Values Defining the Period of Service**

The data templates of the Phase IA Standards & Communication Protocols (S&CP) Document have been developed with the use of standard service attributes in mind. What the Phase IA S&CP Document does not offer are specific definitions for each attribute value. This section offers standards for these service attribute definitions to be used in conjunction with the Phase IA data templates.



RECOMMENDATION TO NAESB WEQ EXECUTIVE COMMITTEE

Requester: Southern Company Services
Request No.: R04005 Date: December 29, 2003

Revised by the Executive Committee on February 24, 2004

Fixed services are associated with transmission services whose periods align with calendar periods such as a day, week, or month. Sliding services are fixed in duration, such as a week or month, but the start and stop time may slide. For example a Sliding week could start on Tuesday and end on the following Monday. Extended allows for services in which the start time may slide and also the duration may be longer than a standard length. For example an Extended week of service could be nine consecutive days. Various transmission service offerings using these terms are defined in Standards 2.1.1 through 2.1.14 below. Next\_Increment indicates the next available full Service\_Increment, such as the next hour, next day, or next week. Next\_Increment is added at this time to address Next Hour Market Service, but may be used in the future to denote other products.

Table 1-1 identifies the standard terminology in OASIS Phase IA for the attributes SERVICE\_INCREMENT (Hourly, Daily, Weekly, Monthly, and Yearly) and TS\_WINDOW (Fixed, Sliding, Extended, and Next\_Increment). Values shown in Table 1-1 as N/A (Not Applicable) are not sufficiently common in the market to require standards.

Next Hour Market Service, a new pro forma service, is denoted as having a Service Increment of Hourly and a TS\_WINDOW of Next\_Increment.

Table 1-1
Standard Service Period Attribute Values in Phase IA

Table with 5 columns: Service Period, Fixed, Sliding, Extended 1, Next Increment. Rows include Hourly, Daily, Weekly, Monthly, and Yearly.

1Included in the Phase IA S&CP Data Dictionary, Version 1.3, issued September 29, 1998.

2Next Hour Market Service is identified by Service Increment = Hourly and TS\_WINDOW = Next\_Increment

The existence of an attribute value in this table does not imply the services must be offered by a Transmission Provider. Requirements as to which services must be offered are defined by regulation and tariffs. Likewise, absence of a service period value in Table 1-1 does not restrict a Transmission Provider from offering a service. The intent of the table is to establish common terminology associated with standard products.

Each service period value assumes a single time zone specified by the Transmission Provider. It is recognized that daylight time switches must be accommodated in practice, but they have been omitted here for the purpose of simplicity.



## RECOMMENDATION TO NAESB WEQ EXECUTIVE COMMITTEE

**Requester:** Southern Company Services

**Request No.:** R04005

**Date:** December 29, 2003

**Revised by the Executive Committee on February 24, 2004**

Page 3 of 32

**Standard 2.1:** A Transmission Provider shall use the values and definitions below for the service period attributes, SERVICE\_INCREMENT AND TS\_WINDOW for all transmission services offered on OASIS, or shall post alternative service period values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use existing attribute values and definitions posted by other Transmission Providers. (See Section 3 for registration requirements.)

**Standard 2.1.1:** FIXED HOURLY - The service starts at the beginning of a clock hour and stops at the end of a clock hour.

**Standard 2.1.2:** FIXED DAILY - The service starts at 00:00 and stops at 24:00 of the same calendar date (same as 00:00 of the next consecutive calendar date).

**Standard 2.1.3:** FIXED WEEKLY - The service starts at 00:00 on Monday and stops at 24:00 of the following Sunday (same as 00:00 of the following Monday).

**Standard 2.1.4:** FIXED MONTHLY - The service starts at 00:00 on the first date of a calendar month and stops at 24:00 on the last date of the same calendar month (same as 00:00 of the first date of the next consecutive month).

**Standard 2.1.5:** FIXED YEARLY - The service starts at 00:00 on the first date of a calendar year and ends at 24:00 on the last date of the same calendar year (same as 00:00 of the first date of the next consecutive year).

**Standard 2.1.6:** SLIDING DAILY - The service starts at the beginning of any hour of the day and stops exactly 24 hours later at the same time on the next day.

**Standard 2.1.7:** SLIDING WEEKLY - The service starts at 00:00 of any date and stops exactly 168 hours later at 00:00 on the same day of the next week.

**Standard 2.1.8:** SLIDING MONTHLY - The service starts at 00:00 of any date and stops at 00:00 on the same date of the next month (28-31 days later). If there is no corresponding date in the following month, the service stops at 24:00 on the last day of the next month.

For example: SLIDING MONTHLY starting at 00:00 on January 30 would stop at 24:00 on February 28 (same as 00:00 March 1).

**Standard 2.1.9:** SLIDING YEARLY - The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year.

For example SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year.



## RECOMMENDATION TO NAESB WEQ EXECUTIVE COMMITTEE

**Requester:** Southern Company Services

**Request No.:** R04005

**Date:** December 29, 2003

**Revised by the Executive Committee on February 24, 2004**

Page 4 of 32

**Standard 2.1.10:** EXTENDED DAILY - The service starts at any hour of a day and stops more than 24 hours later and less than 168 hours later.

**Standard 2.1.11:** EXTENDED WEEKLY - The service starts at 00:00 of any date and stops at 00:00 more than one week later, but less than four weeks later.

**Standard 2.1.12:** EXTENDED MONTHLY - The service starts at 00:00 of any date and stops at 00:00 more than one month later, but less than twelve months later.

**Standard 2.1.13:** EXTENDED YEARLY - The service starts at 00:00 of any date and stops at 00:00 more than one year later, but must be requested in increments of full years.

**Standard 2.1.14:** NEXT\_INCREMENT HOURLY - The service starts at the beginning of the next clock hour and stops at the end of that clock hour.

### Section 2.2 Attribute Values Defining Service Class

**Standard 2.2:** A Transmission Provider shall use the values and definitions below to describe the service class, TS\_CLASS, for transmission services offered on OASIS, or shall post alternative TS\_CLASS attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use the attribute values and definitions posted by other Transmission Providers. (See Section 3 for registration requirements.)

**Standard 2.2.1:** FIRM - Transmission service that always has priority over NONFIRM transmission service and includes Native Load Customers, Network Customers, and any transmission service not classified as non-firm in accordance with the definitions in the pro forma tariff.

**Standard 2.2.2:** NON-FIRM - Transmission service that is reserved and/or scheduled on an as-available basis and is subject to curtailment or interruption at a lesser priority compared to FIRM transmission service, including Native Load Customers and Network Customers, in accordance with the definitions in the pro forma tariff.

### Section 2.3 Attribute Values Defining Service Types

**Standard 2.3:** A Transmission Provider shall use the values and definitions below to describe the service type, TS\_TYPE, for transmission services offered on OASIS, or shall post alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use the attribute values and definitions posted by other Transmission Providers. (See Section 3 for registration requirements.)



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**Standard 2.3.1:** POINT-TO-POINT (PTP) - Transmission service that is reserved and/or scheduled between specified POINTS OF RECEIPT and DELIVERY pursuant to Part II of the pro forma tariff and in accordance with the definitions in the pro forma tariff.

**Standard 2.3.2:** NETWORK - Network Integration Transmission Service that is provided to serve a Network Customer load pursuant to Part III of the pro forma tariff and in accordance with the definitions in the pro forma tariff.

### Section 2.4 Curtailment Priorities

**Standard 2.4:** A Transmission Provider that has adopted NERC TLR Procedures shall use the curtailment priority definitions contained in NERC TLR Procedures for NERC CURTAILMENT PRIORITY (1-7) for all transmission services offered on OASIS. A Transmission Provider that has adopted alternative curtailment procedures shall post its alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use attribute values and definitions posted by another Transmission Provider. (See Section 3 for registration requirements.)

### Section 2.5 Other Service Attribute Values

The Commission has defined six ancillary services in Order No. 888. Other services may be offered pursuant to filed tariffs.

**Standard 2.5:** A Transmission Provider shall use the definitions below to describe the AS\_TYPES offered on OASIS, or shall post alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use attribute values and definitions posted by another Transmission Provider. (See Section 3 for registration requirements.)

#### FERC Ancillary Services Definitions

**Standard 2.5.1:** SCHEDULING, SYSTEM CONTROL AND DISPATCH SERVICE (SC) - is necessary to the provision of basic transmission service within every control area. This service can be provided only by the operator of the control area in which the transmission facilities used are located. This is because the service is to schedule the movement of power through, out of, within, or into the control area. This service also includes the dispatch of generating resources to maintain generation/load balance and maintain security during the transaction and in accordance with section 3.1 (and Schedule 1) of the pro forma tariff.

**Standard 2.5.2:** REACTIVE SUPPLY AND VOLTAGE CONTROL FROM GENERATION SOURCES SERVICE (RV) - is the provision of reactive power and voltage control by generating facilities under the control of the control area operator. This service



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is necessary to the provision of basic transmission service within every control area and in accordance with section 3.2 (and Schedule 2) of the pro forma tariff.

**Standard 2.5.3:** REGULATION AND FREQUENCY RESPONSE SERVICE (RF) - is provided for transmission within or into the transmission provider's control area to serve load in the area. Customers may be able to satisfy the regulation service obligation by providing generation with automatic generation control capabilities to the control area in which the load resides and in accordance with section 3.3 (and Schedule 3) of the pro forma tariff.

**Standard 2.5.4:** ENERGY IMBALANCE SERVICE (I) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour and in accordance with section 3.4 (and Schedule 4) of the pro forma tariff.

**Standard 2.5.5:** OPERATING RESERVE - SPINNING RESERVE SERVICE (SP) - is provided by generating units that are on-line and loaded at less than maximum output. They are available to serve load immediately in an unexpected contingency, such as an unplanned outage of a generating unit and in accordance with section 3.5 (and Schedule 5) of the pro forma tariff.

**Standard 2.5.6:** OPERATING RESERVE - SUPPLEMENTAL RESERVE SERVICE (SU) - is generating capacity that can be used to respond to contingency situations. Supplemental reserve, is not available instantaneously, but rather within a short period (usually ten minutes). It is provided by generating units that are on-line but unloaded, by quick-start generation, and by customer interrupted load and in accordance with section 3.6 (and Schedule 6) of the pro forma tariff.

### **Other Service Definitions**

Other services may be offered to Transmission Customers through Commission-approved revisions to their individual open access tariffs. Examples of other services that may be offered include the Interconnected Operations Services described below in Standards 2.5.7, 2.5.8, and 2.5.9. Ancillary service definitions may be offered pursuant to an individual transmission provider's specific tariff filings.

**Standard 2.5.7:** DYNAMIC TRANSFER (DT) - is the provision of the real-time monitoring, telemetering, computer software, hardware, communications, engineering, and administration required to electronically move all or a portion of the real energy services associated with a generator or load out of its Host Control Area into a different Electronic Control Area.



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**Standard 2.5.8:** REAL POWER TRANSMISSION LOSSES (TL) - is the provision of capacity and energy to replace energy losses associated with transmission service on the Transmission Provider's system.

**Standard 2.5.9:** SYSTEM BLACK START CAPABILITY (BS) - is the provision of generating equipment that, following a system blackout, is able to start without an outside electrical supply. Furthermore, BLACK START CAPABILITY is capable of being synchronized to the transmission system such that it can provide a startup supply source for other system capacity that can then be likewise synchronized to the transmission system to supply load as part of a process of re-energizing the transmission system.

**Standard 2.6:** A Transmission Provider shall use the definitions below to describe the scheduling period leading up to the start time of a transaction:

**Standard 2.6.1:** SAME-DAY is after 2 p.m. of the preceding day and

**Standard 2.6.2:** NEXT-HOUR is one hour or less prior to the service start time.

### Section 3 OASIS Registration Procedures

#### Section 3.1 Entity Registration

Operation of OASIS requires unambiguous identification of parties.

**Standard 3.1:** All entities or persons using OASIS shall register the identity of their organization (including DUNS number) or person at the OASIS Home Page at <http://www.tsin.com>. Registration identification shall include the parent entity (if any) of the registrant. Registration shall be a prerequisite to OASIS usage and renewed annually and whenever changes in identification occur and thereafter. An entity or person not complying with this requirement may be denied access by a transmission provider to that transmission provider's OASIS node.

The registration requirement applies to any entity logging onto OASIS for the purpose of using or updating information, including Transmission Providers, Transmission Customers, Observers, Control Areas, Security Coordinators, and Independent System Operators.

#### Section 3.2 Process to Register Non-Standard Service Attribute Values

Section 2 of the OASIS business practice standards addresses the use of standard terminology in defining services on OASIS. These standard definitions for service attribute values will be posted publicly on the OASIS Home Page at <http://www.tsin.com> and may be used by all Transmission Providers to offer transmission and ancillary services on OASIS. If the Transmission Provider determines that the standard definitions are not applicable, the Transmission Provider may register





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new attribute values and definitions on the OASIS Home Page. Any Transmission Provider may use the attribute values and definitions posted by another Transmission Provider.

**Standard 3.2:** Providers of transmission and ancillary services shall use only attribute values and definitions that have been registered on the OASIS Home Page at <http://www.tsin.com> for all transmission and ancillary services offered on their OASIS.

**Standard 3.3:** Providers of transmission and ancillary services shall endeavor to use on their OASIS nodes attribute values and definitions that have been posted by other Transmission Providers on the OASIS Home Page at <http://www.tsin.com> whenever possible.

### **Section 3.3 Registration of Points of Receipt and Delivery**

In order to improve coordination of path naming and to enhance the identification of commercially available connection points between Transmission Providers and regions, the business practice for Phase IA OASIS requires that:

- I. Transmission Providers register at the OASIS Home Page at <http://www.tsin.com>, all service points (Points of Receipt and Delivery) for which transmission service is available over the OASIS.
- II. Each Transmission Provider would then indicate on its OASIS node, for each Path posted on its OASIS node, the Points of Receipt and Delivery to which each Path is connected.

A Transmission Provider is not required to register specific generating stations as Points of Receipt, unless they were available as service points for the purposes of reserving transmission service on OASIS. The requirement also does not include registration of regional flowgates, unless they are service points for the purposes of reserving transmission on OASIS.

**Standard 3.4:** A Transmission Provider shall register and thereafter maintain on the OASIS Home Page at <http://www.tsin.com> all Points of Receipt and Delivery to and from which a Transmission Customer may reserve and schedule transmission service.

**Standard 3.5:** For each reservable Path posted on their OASIS nodes, Transmission Providers shall indicate the available Point(s) of Receipt and Delivery for that Path. These Points of Receipt and Delivery shall be from the list registered on the OASIS Home Page at <http://www.tsin.com>.

**Standard 3.6:** When two or more Transmission Providers share common Points of Receipt or Delivery, or when a Path connects Points of Receipt and Delivery in neighboring systems, the Transmission Providers owning and/or operating those



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facilities shall apply consistent names for those connecting paths or common paths on the OASIS.

#### **Section 4 On-line Negotiation and Confirmation Process**

##### **Section 4.1 On-line Price Negotiation in Short-term Markets**

**Standard 4.1:** Consistent with FERC policy and regulations, all reservations and price negotiations shall be conducted on OASIS.

**Standard 4.2:** Reserved

**Standard 4.3:** Reserved

##### **Section 4.2 Phase IA Negotiation Process State Transition Diagram**

The Phase IA S&CP Document provides a process state diagram to define the Customer and Transmission Provider interactions for negotiating transmission service. This diagram defines allowable steps in the reservation request, negotiation, approval and confirmation.

**Standard 4.4:** The state diagram appearing in Exhibit 4-1 in Section 4.2.10.2 of the Version 1.3 of the S&CP Document constitutes a recommended business practice in OASIS Phase IA.

**Standard 4.5:** The definitions in Section 4.2.10.2 of the Version 1.3 of the S&CP Document (status values) shall be applied to the process states in OASIS Phase IA.

Table 4-1 – Reserved

##### **Section 4.3 Negotiations Without Competing Bids**

The following practices are defined in order to enhance consistency of the reservation process across OASIS Phase IA nodes.

**Standard 4.6:** A Transmission Provider/Seller shall respond to a Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-2 Reservation Timing Requirements**. The time limit is measured from the time the request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

- I. INVALID
- II. DECLINED
- III. REFUSED
- IV. COUNTEROFFER



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- V. ACCEPTED
VI. STUDY (when the tariff allows), leading to REFUSED, COUNTEROFFER, or ACCEPTED.

Standard 4.7: Prior to setting a request to ACCEPTED, COUNTEROFFER, or REFUSED a Transmission Provider shall evaluate the appropriate resources and ascertain that the requested transfer capability is (or is not) available.

Standard 4.8: For any request that is REFUSED or INVALID, the Transmission Provider must indicate in the SELLER\_COMMENTS field the reason the request was refused or invalid.

Standard 4.9: The Customer may change a request from QUEUED, RECEIVED, STUDY, COUNTEROFFER, REBID, or ACCEPTED to WITHDRAWN at any time prior to CONFIRMED.

Standard 4.10: From ACCEPTED or COUNTEROFFER, a Customer may change the status to CONFIRMED or WITHDRAWN. In addition, a Customer may change the status from COUNTEROFFER to REBID. The Customer has the amount of time designated as Customer Confirmation Time Limit in Table 4-2 Reservation Timing Requirements to change the state of the request to CONFIRMED. The Customer time limit is measured from the first time the request is moved to ACCEPTED or COUNTEROFFER, and is not reset with subsequent iterations of negotiation.

Standard 4.11: After expiration of the Customer Confirmation Time Limit, specified in Table 4-2 Reservation Timing Requirements, the Transmission Provider has a right to move the request to the RETRACTED state.

Standard 4.12: Should the Customer elect to respond to a Transmission Provider's COUNTEROFFER by moving a reservation request to REBID, the Transmission Provider shall respond by taking the request to a DECLINED, ACCEPTED, or COUNTEROFFER state within the Provider Counter Time Limit, specified in Table 42 Reservation Timing Requirements. The Transmission Provider response time is measured from the most recent REBID time.

Standard 4.13: The following timing requirements shall apply to all reservation requests:

Table 4-2
Reservation Timing Requirements

Table with 6 columns: Class, Service Increment, Time QUEUED Prior to Start, Provider Evaluation Time Limit, Customer Confirmation Limit (ACCEPTED or COUNTEROFFER), and Provider Counter Time Limit after REBID. Row 1: Non-Hourly, <1 hour, Best effort, 5 minutes, 5 minutes.



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Firm					
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes	10 minutes
Non-Firm	Daily	N/A	30 minutes	2 hours	10 minutes
Non-Firm	Weekly	N/A	4 hours	24 hours	4 hours
Non-Firm	Monthly	N/A	2 days <sup>5</sup>	24 hours	4 hours
Firm	Daily	< 24 hours	Best effort	2 hours	30 minutes
Firm	Daily	N/A	30 days <sup>6</sup>	24 hours	4 hours
Firm	Weekly	N/A	30 days <sup>6</sup>	48 hours	4 hours
Firm	Monthly	N/A	30 days <sup>6</sup>	4 days	4 hours
Firm	Yearly	60 days <sup>7</sup>	30 days	15 days	4 hours

**Notes for Table 4-2:**

<sup>1</sup>Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.

<sup>2</sup>Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override preemption deadlines.

<sup>3</sup>Measurement starts at the time the request is first moved to either ACCEPTED or COUNTEROFFER. The time limit does not reset on subsequent changes of state.

<sup>4</sup>Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.

<sup>5</sup>Days are defined as calendar days.

<sup>6</sup>Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers shall make best efforts to respond within 72 hours, or prior to the scheduling deadline, whichever is earlier, to a request for Daily Firm Service received during period 2-30 days ahead of the service start time.

<sup>7</sup>Subject to Section 17.1 of the pro forma tariff, whenever feasible and on a nondiscriminatory basis, transmission providers should accommodate requests made with less than 60 days notice.

**Section 4.4 Negotiations With Competing Bids for Constrained Resources**

Competing bids exist when multiple requests cannot be accommodated due to a lack of available transmission capacity. One general rule is that OASIS requests should be evaluated and granted priority on a first-come-first-served basis established by OASIS QUEUED time. Thus, the first to request service should get it, all else being equal.



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Exceptions to this first-come-first-served basis occur when there are competing requests for limited resources and the requests have different priorities established by FERC regulations and filed tariffs. Prior to the introduction of price negotiations, the attribute values that have served as a basis for determining priority include:

- I. Type (Network, Point-to-point)
- II. Class (Firm, Non-Firm)
- III. Increment (Hourly, Daily, Weekly, Monthly, Yearly)
- IV. Duration (the amount of time between the Start Date and the Stop Date)
- V. Amount (the MW amount)

Under a negotiation model, price can also be used as an attribute for determining priority. The negotiation process increases the possibility that a Transmission Provider will be evaluating multiple requests that cannot all be accommodated due to limited resources. In this scenario, it is possible that an unconfirmed request with an earlier QUEUED time could be preempted (SUPERSEDED). For this to occur, the subsequent request would be of higher priority or of greater price.

**Standard 4.14:** Consistent with regulations and filed tariffs, the following are recommended relative priorities of Service Request Tiers<sup>1</sup>. Specific exceptions may exist in accordance with filed tariffs. The priorities refer only to negotiation of service and do not refer to curtailment priority.

- 4.14.1. Service Request Tier 1: Native load, Network, or Long-term Firm
- 4.14.2. Service Request Tier 2: Short-term Firm
- 4.14.3. Service Request Tier 3: Network Service From Non-designated Resources
- 4.14.4. Service Request Tier 4: Non-firm
- 4.14.5. Service Request Tier 5: Non-firm Point-to-point Service over secondary receipt and delivery points
- 4.14.6. Service Request Tier 6: Non-firm Next Hour Market Service

**Standard 4.15:** Consistent with regulations and filed tariffs, reservation requests shall be handled in a first-come-first-served order based on QUEUE\_TIME.

**Standard 4.16:** Consistent with regulations and filed tariffs, Table 4-3 describes the relative priorities of competing service requests and rules for offering right-of-first-refusal. While the table indicates the relative priorities of two competing requests, it also is intended to be applied in the more general case of more than two competing requests.

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<sup>1</sup>Note: The term Tier is introduced to avoid confusion with existing terms such as TS\_CLASS.



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**Table 4-3  
Priorities for Competing Reservation Requests**

<b>R O W</b>	<b>Request 1</b>	<b>Is Preempted by Request 2</b>	<b>Right of First Refusal</b>
1	Tier 1: Long-term Firm, Native Load, and Network Firm	N/A - Not preempted by a subsequent request.	N/A
2	Tier 2: Short-term Firm	Tier 1: Long-term Firm, Native Load, and Network Firm, while Request 1 is conditional. Once Request 1 is unconditional, it may not be preempted.	No
3	Tier 2: Short-term Firm	Tier 2: Short-term Firm of longer term (duration), while Request 1 is conditional. Once Request 1 is unconditional, it may not be preempted. <sup>1</sup>	Yes, while Request 1 is conditional. Once Request 1 is unconditional, it may not be preempted and right of first refusal is not applicable.
4	Tier 3: Network Service From Non-Designated Resources	Tiers 1 and 2: All Firm (including Network).	No
5	Tier 4: All Non-Firm PTP	Tiers 1 and 2: All Firm (including Network).	No
6	Tier 4: All Non-Firm PTP	Tier 3: Network Service from Non-Designated Resources.	No
7	Tier 4: All Non-Firm PTP	Tier 4: Non-firm PTP of a longer term (duration) <sup>1</sup> . Except in the last hour prior to start (See Standard 4.23).	Yes <sup>2</sup>
8	Tier 4: All Non-Firm PTP	Tier 4: Non-firm PTP of equal term (duration) <sup>1</sup> and higher price, when Request 1 is still unconfirmed and Request 2 is received pre-confirmed. A confirmed non-firm PTP may not be preempted for another non-firm request of equal duration. (See Standards 4.22 and 4.25.)	Yes <sup>3</sup>
9	Tier 5: Non-firm PTP Service over secondary	Tier 5 can be preempted by Tiers 1 through 4.	No



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Table with 3 columns: Receipt and delivery points, Tier 6: Non-firm Next Hour Market Service, Tier 6 can be preempted by Tiers 1 through 5, No

1 Longer duration, in addition to being higher SERVICE\_INCREMENT (i.e., WEEKLY has priority over DAILY), also may mean more multiples of the same SERVICE\_INCREMENT (i.e., 3 days may have priority over 2 days). Multiple service increments must be at the same level of capacity.

2 Right of first refusal when a subsequent request is received of a longer duration applies only if the first request is confirmed.

3 Right of first refusal when a subsequent request is received of an equal duration and higher price applies only when the first request is unconfirmed and the subsequent request is received preconfirmed (see Standards 4.22 and 4.26).

Standard 4.17: For a request or reservation that is Superseded or Displaced, the Transmission Provider must indicate the Assignment Reference Number of the competing request and the reason for denial of service in the SELLER\_COMMENTS field.

Standard 4.18: Given competing requests for a limited resource and a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from an ACCEPTED or COUNTEROFFER state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-3. These state changes require dynamic notification to the Customer if the Customer has requested dynamic notification on OASIS.

Standard 4.19: In those cases where right-of-first-refusal is required to be offered, the Transmission Provider shall notify the Customer, through the use of a COUNTEROFFER, of the opportunity to match the subsequent offer.

Standard 4.20: A Customer who has been extended a right-of-first-refusal shall have a confirmation time limit equal to the lesser of a) the Customer Confirmation Time Limit in Table 4-2 or b) 24 hours.

Standard 4.21: A Transmission Provider shall apply all rights-of-first-refusal in a nondiscriminatory and open manner for all Customers.

Standard 4.22: Once a non-firm PTP request has been confirmed, it shall not be displaced by a subsequent non-firm PTP request of equal duration and higher price.



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**Standard 4.23:** A confirmed, non-firm PTP reservation for the next hour shall not be displaced within one hour of the start of the reservation by a subsequent non-firm PTP reservation request of longer duration.

**Standard 4.24:** A Transmission Provider shall accept any reservation request submitted for an unconstrained Path if the Customer's bid price is equal to or greater than the Transmission Provider's posted offer price at the time the request was queued, even if

later requests are submitted at a higher price. This standard applies even when the first request is still unconfirmed, unless the Customer Confirmation Time Limit has expired for the first request.

**Standard 4.25:** Once an offer to provide non-firm PTP transmission service at a given price is extended to a Customer by the Transmission Provider, and while this first request is still unconfirmed but within the Customer Confirmation Time Limit, the Transmission Provider shall not preempt or otherwise alter the status of that first request on receipt of a subsequent request of the same Tier and equal duration at a higher price, unless the subsequent request is submitted as pre-confirmed.

**Standard 4.26:** If during a negotiation of service (*i.e.*, prior to Customer confirmation) a subsequent pre-confirmed request for service over the same limited resource of equal duration but higher price is received, the Transmission Provider must COUNTEROFFER the price of service on the prior COUNTEROFFER or ACCEPTED price to match the competing offer, in order to give the first Customer an opportunity to match the offer. This practice must be implemented in a non-discriminatory manner.

**Standard 4.27:** Whenever a request or reservation is set to the state of Invalid, Refused, Declined, Superseded, Retracted, Annulled, or Displaced, the Transmission Provider or Seller shall enter the reason for the action in the SELLER\_COMMENTS field.

### **Section 5 Procurement of Ancillary and Other Services**

#### **Section 5.1 Introduction**

Phase IA OASIS data templates allow the coupling of ancillary service arrangements with the purchase of transmission service for the purpose of simplifying the overall process for Customers. Transmission Providers must indicate (consistent with filed tariffs), which services are MANDATORY (must be taken from the Primary Transmission Provider), REQUIRED (must be provided for but may be procured from alternative sources), or OPTIONAL (not required as a condition of transmission service).

The Transmission Customer should make known to the Transmission Provider at the time of the reservation request certain options related to arrangement of ancillary services. The Transmission Customer may indicate:

- a. I will take all the MANDATORY and REQUIRED ancillary services from the Primary Transmission Provider





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- b. I will take REQUIRED ancillary services from Third Party Seller X
- c. I would like to purchase OPTIONAL services
- d. I will self provide ancillary services
- e. I will arrange for ancillary services in the future (prior to scheduling)

While these interactions are available in the Phase IA S&CP Document, there is a need to clarify the associated business practices. The standards in Section 5 apply to services defined in filed tariffs.

### **Section 5.2 Transmission Provider Requirements**

**Standard 5.1:** The Transmission Provider shall designate which ancillary services are MANDATORY, REQUIRED, or OPTIONAL for each offered transmission service or each transmission path to the extent these requirements can be determined in advance of the submittal of a reservation request on a specific Path by a Transmission Customer.

**Standard 5.2:** A Transmission Provider shall modify a Transmission Customer's service request to indicate the Transmission Provider as the SELLER of any ancillary service, which is MANDATORY, to be taken from the Transmission Provider.

**Standard 5.3:** For REQUIRED and OPTIONAL services, the Transmission Provider shall not select a SELLER of ancillary service without the Transmission Customer first selecting that SELLER.

**Standard 5.4:** A Transmission Provider may accept a Transmission Customer's request for an ancillary service, which is not MANDATORY or REQUIRED, but shall indicate to the Transmission Customer at the time of acceptance in SELLER\_COMMENTS that the service is not MANDATORY or REQUIRED.

### **Section 5.3 Transmission Customer Requirements**

**Standard 5.5:** The Transmission Customer shall indicate with the submittal of a transmission reservation request, the preferred options for provision of ancillary services, such as the desire to use an alternative resource. The Transmission Provider shall post itself as the default ancillary service provider, if a Transmission Customer fails to indicate a third party SELLER of ancillary services. However, the Transmission Customer may change this designation at a later date, so long as this change is made prior to the Transmission Provider's scheduling deadline.

**Standard 5.6:** A Transmission Customer may, but is not required to, indicate a third party SELLER of ancillary services, if these services are arranged by the Transmission Customer off the OASIS and if such arrangements are permitted by the Transmission Provider's tariff. The Transmission Provider shall post itself as the default ancillary service provider, if a Transmission Customer fails to indicate a third party SELLER of ancillary services. However, the Transmission Customer may change this designation



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at a later date, so long as this change is made prior to the Transmission Provider's scheduling deadline.

### **Section 6 - Pathnaming Standards**

#### **Section 6.1 Introduction**

The Data Element Dictionary of the OASIS S&CP Document, Version 1.3, defines a path name in terms of a 50-character alphanumeric string:

#### **RR/TPTP/PATHPATHPATH/OPTIONALFROM-OPTIONALTOTO/SPR**

RegionCode/TransmissionProviderCode/PathName/OptionalFrom-To(POR-POD)/Spare

This definition leaves it to the Transmission Providers to name the paths from their own perspective. The following standards provide an unambiguous convention for naming paths and will produce more consistent path names.

#### **Section 6.2 Transmission Provider Requirements**

**Standard 6.1:** A transmission provider shall use the path naming convention defined in the S&CP Data Dictionary for the naming of all reservable paths posted on OASIS.

**Standard 6.2:** A transmission provider shall use the third field in the path name to indicate the sending and receiving control areas. The control areas shall be designated using standard NERC codes for the control areas, separated by a hyphen. For example, the first three fields of the path name will be:

#### **RR/TPTP/CAXX-CAYY/**

**Standard 6.3:** A transmission provider shall use the fourth field of the path name to indicate POR and POD separated by a hyphen. For example, a path with a specific POR/POD would be shown as:

#### **RR/TPTP/CAXX-CAYY/PORPORPOR-PODPODPOD/**

If the POR and POD are designated as control areas, then the fourth field may be left blank (as per the example in 6.2).

**Standard 6.4:** A transmission provider may designate a sub-level for Points of Receipt and Delivery. For example, a customer reserves a path to POD AAAA. The ultimate load may be indeterminate at the time. Later, the customer schedules energy to flow to a particular load that may be designated by the transmission provider as a sub-level Point of Delivery. This option is necessary to ensure certain transmission providers are not precluded from using more specific service points by the inclusion of the POR/POD



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in the path name. All sub-level PORs and PODs must be registered as such on <http://www.tsin.com>.

### **Section 7 – Next Hour Market Service**

#### **Section 7.1 Introduction**

The standards in this section apply to the offering of Next Hour Market (NHM) Service only. The Commission has designated this service as voluntary for a transmission provider to offer. Therefore the standards apply to a transmission provider only if that provider offers NHM Service, in which case the standards become mandatory for that provider.

#### **Section 7.2 Transmission Provider Requirements**

**Standard 7.1:** Use of NHM Service shall be limited to interchange transactions having a duration of one clock-hour and requested no earlier than 60 minutes prior to the start time of the transaction.

**Standard 7.2:** A transmission provider offering NHM Service shall allow an eligible transmission customer to request a NHM Service reservation electronically using protocols compliant with the NERC ETAG Specification 1.6.

**Standard 7.3:** A transmission provider offering NHM Service shall allow a transmission customer to request NHM Service for one or more path segments of a tag by designating: (a) 0-NX as the transmission product code under the OASIS block and (b) BUYATMARKET as the OASIS reservation identifier.

**Standard 7.4:** A transmission provider offering NHM Service shall consider the submittal of a tag designating that provider on one or more path segments using NHM Service to include a pre-confirmed request for the necessary transmission reservation and associated mandatory ancillary services for each designated path segment, for the hour indicated. No additional confirmation steps shall be required by the transmission customer for a NHM Service transmission reservation and associated ancillary services.

**Standard 7.5:** A transmission provider offering NHM Service shall consider set the amount of the NHM Service reservation as:

- a. The amount of the Transmission Provider Product, if specified.
- b. In accordance with the Transmission Provider's tariff, the MW amount at the POR or POD for that Provider in the Loss Table, if Transmission Provider Product is not specified.
- c. The MW amount in the Energy Profile, if neither Transmission Provider Product amount nor Provider Loss Table amounts are specified.



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**Standard 7.6:** The OASIS queue time of a NHM Service request or reservation shall be the transmission provider ETAG approval service receipt time, unless a system failure requires the use of ETAG backup procedures, in which case the OASIS queue time shall be the time the tag is received by the transmission provider.

**Standard 7.7:** The 0-NX designation in the tag assigns as transmission customer, for all NHM Service path segments in the transaction, the PSE that is designated as the Purchasing-Selling Entity (PSE) responsible for the tag. A PSE submitting a tag may not designate a NHM Service reservation for another PSE and a transmission provider may not assign a reservation to any transmission customer other than the PSE submitting the NHM Service tag.

**Standard 7.8:** When evaluating competing requests for transmission reservations, a transmission provider offering NHM Service shall consider the NHM Service to have a priority lower than Tier 5 – point-to-point service over secondary receipt and delivery points.

**Standard 7.9:** Once a tag goes to IMPLEMENT or CONDITIONAL status in ETAG, the transmission provider shall consider the associated NHM Service reservations to be confirmed. Since the NHM Service confirmed reservation(s) are by definition less than one hour prior to start, these reservations shall not be displaced by a subsequent non-firm reservation of higher priority.

**Standard 7.10:** The transmission customer shall be obligated to pay for the transmission service under the terms of the tariff at the posted offer price for non-firm hourly service, once the interchange transaction tag is changed to the IMPLEMENT or CONDITIONAL status in ETAG. In the event of a voluntary withdrawal or reduction in the amount or duration of the service by the transmission customer after the tag has changed to IMPLEMENT or CONDITIONAL, the transmission customer shall remain obligated to pay for the full amount of the approved request. In the event of an involuntary curtailment or reduction of the service, initiated by the transmission provider or any other transmission provider, the transmission customer shall not be obligated to pay for any portions of the NHM Service that were involuntarily curtailed. In the case of involuntary curtailment or reduction, payment shall be based on a calculation of the MWhours actually used.

**Standard 7.11:** In the case that a transaction uses NHM Service for all required path segments in the tag, the default condition of the tag is NOT approved unless all required transmission providers and control areas indicate tag approval.

**Standard 7.12:** In the case that a transaction mixes one or more transaction path segments that use NHM Service with one or more path segments that use other types of transmission service, then 1) as long as the NHM Service path segment(s) are not fully approved, then the tag shall default to NOT approved; and 2) if all NHM Service path segments in the ETAG are fully approved, then the tag shall revert to the normal default status as specified in NERC Operating Policy 3 and associated Appendices.



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**Standard 7.13:** The transmission customer shall be required to submit a NHM Service transaction request prior to the tag submittal time limit as specified in NERC Operating Policy 3 and associated Appendices, and no earlier than 60 minutes prior to the start of the transaction.

**Standard 7.14:** The approval mechanism for a NHM Service reservation shall be the tag approval. If the tag is approved and moved to the IMPLEMENT or CONDITIONAL state, all required NHM Service transmission reservations associated with that tag shall be considered confirmed reservations. If one or more transmission providers do NOT approve their segment(s) of the transaction, then the transaction shall be considered NOT approved. Each transmission provider designated in a tag that does not approve that segment of the tag shall indicate that the associated reservation for that segment is REFUSED. If a designated transmission provider in a NHM Service path segment approves the tag but the tag is not approved through the action or inaction of another transmission provider, then that transmission provider shall indicate that reservation is ANNULLED.

**Standard 7.15:** The transmission provider shall assign the reservation request and final disposition status on behalf of the transmission customer within one hour of the requested start of the NHM Service transaction, regardless of the ultimate disposition of the tag.

**Standard 7.16:** NHM Service shall have the lowest curtailment priority in the event that a curtailment or reduction of transfers is initiated. Specifically, NHM Service (0-NX) shall have a NERC Curtailment Priority of 0.

**Standard 8.** A Responsible Party may not deny or restrict access to an OASIS user merely because that user makes automated computer-to-computer file transfers or queries, or extensive requests for data.

**Standard 9.** In the event that an OASIS user's grossly inefficient method of accessing an OASIS node or obtaining information from the node seriously degrades the performance of the node, a Responsible Party may limit a user's access to the OASIS node without prior Commission approval. The Responsible Party must immediately contact the OASIS user to resolve the problem. Notification of the restriction must be made to the Commission within two business days of the incident and include a description of the problem. A closure report describing how the problem was resolved must be filed with the Commission within one week of the incident.

**Standard 10.** In the event that an OASIS user makes an error in a query, the Responsible Party can block the affected query and notify the user of the nature of the error. The OASIS user must correct the error before making any additional queries. If there is a dispute over whether an error has occurred, the procedures in the preceding paragraph apply.



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**Standard 11.** Transmission Providers must provide "read only" access to the OASIS to Commission staff and to the staff of State regulatory authorities, at no cost, after such staff members have complied with the requisite registration procedures.

**Standard 12.** The information posted on the OASIS must be in such detail and the OASIS must have such capabilities as to allow Transmission Customers to:

- (a) Clearly identify the degree to which transmission service requests or schedules were denied or interrupted;
- (b) Obtain access, in electronic format, to information to support available transmission capability calculations and historical transmission service requests and schedules for various audit purposes; and
- (c) Make file transfers and automated computer-to-computer file transfers and queries as defined by the Standards and Communications Protocols Document.

**Standard 13.** Information to support any such curtailment or interruption, including the operating status of the facilities involved in the constraint or interruption, must be maintained and made available upon request, to the curtailed or interrupted customer, the Commission's Staff, and any other person who requests it, for three years.

**Standard 14.** Each OASIS user must notify the Responsible Party one month in advance of initiating a significant amount of automated queries. The OASIS user must also notify the Responsible Party one month in advance of expected significant increases in the volume of automated queries.



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**Standard 15.** § 37.1 Applicability.

This part applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce and to transactions performed under the pro forma tariff required in Part 35 of this Chapter.

**Standard 16.** § 37.2 Purpose.

(a) The purpose of this part is to ensure that potential customers of open access transmission service receive access to information that will enable them to obtain transmission service on a non-discriminatory basis from any Transmission Provider. These rules provide standards of conduct and require the Transmission Provider (or its agent) to create and operate an Open Access Same-time Information System (OASIS) that gives all users of the open access transmission system access to the same information.

(b) The OASIS will provide information by electronic means about available transmission capability for point-to-point service and will provide a process for requesting transmission service. OASIS will enable Transmission Providers and Transmission Customers to communicate promptly requests and responses to buy and sell available transmission capacity offered under the Transmission Provider's tariff.

**Standard 17.** § 37.3 Definitions.

(a) Transmission Provider means any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.

(b) Transmission Customer means any eligible customer (or its designated agent) that can or does execute a transmission service agreement or can or does receive transmission service.

(c) Responsible Party means the Transmission Provider or an agent to whom the Transmission Provider has delegated the responsibility of meeting any of the requirements of this Part.

(d) Reseller means any Transmission Customer who offers to sell transmission capacity it has purchased.

(e) Wholesale Merchant Function means the sale for resale, or purchase for resale, of electric energy in interstate commerce.

(f) Affiliate means:

(1) for any exempt wholesale generator, as defined under section 32(a) of the Public Utility Holding Company Act of 1935, as amended, the same as provided in section 214 of the Federal Power Act; and

(2) for any other entity, the term affiliate has the same meaning as given in § 161.2(a) of this Chapter.

**Standard 18.** § 37.4 Standards of conduct.

A Transmission Provider must conduct its business to conform with the following standards:

(a) General Rules

(1) Except as provided in paragraph (a)(2) of this section, the employees of the Transmission Provider engaged in transmission system operations must function



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independently of its employees, or the employees of any of its affiliates, who engage in Wholesale Merchant Functions.

(2) Notwithstanding any other provisions in this section, in emergency circumstances affecting system reliability, Transmission Providers may take whatever steps are necessary to keep the system in operation. Transmission Providers must report to the Commission and on the OASIS each emergency that resulted in any deviation from the standards of conduct, within 24 hours of such deviation.

(b) Rules governing employee conduct

(1) Prohibitions. Any employee of the Transmission Provider, or any employee of an affiliate, engaged in wholesale merchant functions is prohibited from:

(i) conducting transmission system operations or reliability functions; and

(ii) having access to the system control center or similar facilities used for transmission operations or reliability functions that differs in any way from the access available to other open access Transmission Customers.

(2) Transfers. Employees engaged in either (i) wholesale merchant functions or (ii) transmission system operations or reliability functions are not precluded from transferring between such functions as long as such transfer is not used as a means to circumvent the standards of conduct of this section. Notices of any employee transfer to or from transmission system operations or reliability functions must be posted on the OASIS as provided in § 37.6 (g)(3). The information to be posted must include: the name of the transferring employee, the respective titles held while performing each function (i.e., on behalf of the Transmission Provider and wholesale merchant or affiliate), and the effective date of the transfer. The information posted under this section must remain on the OASIS for 90 days.

(3) Information Access. Any employee of the Transmission Provider, or of any of its affiliates, engaged in wholesale merchant functions:

(i) shall have access to only that information available to the Transmission Provider's open access transmission customers (i.e., the information posted on an OASIS), and must not have preferential access to any information about the Transmission Provider's transmission system that is not available to all users of an OASIS; and

(ii) is prohibited from obtaining information about the Transmission Provider's transmission system (including information about available transmission capability, price, curtailments, ancillary services, and the like) through access to information not posted on the OASIS that is not otherwise also available to the general public without restriction, or through information through the OASIS that is not also publicly available to all OASIS users.

(4) Disclosure. A Transmission Provider is responsible for ensuring compliance with the following provisions:

(i) Any employee of the Transmission Provider, or any employee of an affiliate, engaged in transmission system operations or reliability functions may not disclose to employees of the Transmission Provider, or any of its affiliates, engaged in wholesale merchant functions any information concerning the transmission system of the Transmission Provider or the transmission system of another (including information received from non-affiliates or information about available transmission capability,





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price, curtailments, ancillary services, etc.) through non-public communications conducted off the OASIS, through access to information not posted on the OASIS that is not at the same time available to the general public without restriction, or through information on the OASIS that is not at the same time publicly available to all OASIS users (such as E-mail).

(ii) If an employee of the Transmission Provider engaged in transmission system operations or reliability functions discloses information not posted on the OASIS in a manner contrary to the requirements of the standards of conduct, the Transmission Provider must immediately post such information on the OASIS.

(iii) A Transmission Provider may not share any market information, acquired from nonaffiliated Transmission Customers or potential nonaffiliated Transmission Customers, or developed in the course of responding to requests for transmission or ancillary service on the OASIS, with its own employees (or those of an affiliate) engaged in merchant functions, except to the limited extent information is required to be posted on the OASIS in response to a request for transmission service or ancillary services.

### (5) Implementing Tariffs.

(i) Employees of the Transmission Provider engaged in transmission system operations or reliability functions must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if these provisions do not provide for the use of discretion.

(ii) Employees of the Transmission Provider engaged in transmission system operations must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all customers (including the public utility and any affiliate) in a non-discriminatory manner, if these provisions involve discretion.

(iii) The Transmission Provider must keep a log, available for Commission audit, detailing the circumstances and manner in which it exercised its discretion under any terms of the tariff.

(iv) The Transmission Provider may not, through its tariffs or otherwise, give preference to wholesale purchases or sales made on behalf of its own power customers, or those of an affiliate, over the interests of any other wholesale customer in matters relating to the sale or purchase of transmission service (including issues of price, curtailments, scheduling, priority, ancillary services, etc.).

(v) If the Transmission Provider offers a discount on purchases of transmission service made on behalf of its own power customers or those of any affiliate, then, at the same time, it must post on the OASIS an offer to provide the same discount to all Transmission Customers on the same path and on all unconstrained transmission paths.

(vi) If the Transmission Provider offers a rate discount on ancillary services to an affiliate, or attributes a discounted ancillary service rate to its own transactions, the Transmission Provider must, at the same time, post on the OASIS an offer to provide the same discount to all eligible customers.

(6) Books and Records. A Transmission Provider must maintain its books of account and records (as prescribed under Parts 101 and 125 of this Chapter)



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separately from those of its affiliates and these must be available for Commission inspection.

(c) Maintenance of written procedures. The Transmission Provider must maintain in a public place, and file with the Commission, current written procedures implementing the standards of conduct in such detail as will enable customers and the Commission to determine that the Transmission Provider is in compliance with the requirements of this section.

### **Standard 19. § 37.5 Obligations of Transmission Providers and Responsible Parties.**

(a) Each Transmission Provider is required to provide for the operation of an OASIS, either individually or jointly with other Transmission Providers, in accordance with the requirements of this Part. The Transmission Provider may delegate this responsibility to a Responsible Party such as another Transmission Provider, an Independent System Operator, a Regional Transmission Group, or a Regional Reliability Council.

(b) A Responsible Party must: (1) provide access to an OASIS providing standardized information relevant to the availability of transmission capacity, prices, and other information (as described in this Part) pertaining to the transmission system for which it is responsible; and

(2) shall operate the OASIS in compliance with the standardized procedures and protocols found in OASIS Standards and Communication Protocols, which can be obtained from the Public Reference and Files Maintenance Branch, Room 2A, Federal Energy Regulatory Commission, 888 First Street NE, Washington, DC 20426.

(c) Transmission Providers must provide "read only" access to the OASIS to Commission staff and the staffs of State regulatory authorities, at no cost, after such staff members have complied with the requisite registration procedures.

### **Standard 20. § 37.6 Information to be posted on an OASIS.**

(a) The information posted on the OASIS must be in such detail as to allow Transmission Customers to:

(1) make requests for transmission services offered by Transmission Providers, Resellers and other providers of ancillary services;

(2) view and download in standard formats, using standard protocols, information regarding the transmission system necessary to enable prudent business decision making;

(3) post, view, upload and download information regarding available products and desired services;

(4) clearly identify the degree to which their transmission service requests or schedules were denied or interrupted; and

(5) obtain access, in electronic format, to information to support available transmission capability calculations and historical transmission service requests and schedules for various audit purposes.

(b) Posting transmission capability. The transmission capability that is expected to be available on the Transmission Provider's system (ATC) and the total transmission capability (TTC) of that system shall be calculated and posted for each Posted Path as set out in this section.



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(1) Definitions. For purposes of this section,

(i) Posted Path means any control area to control area interconnection; any path for which service is denied, curtailed or interrupted for more than 24 hours in the past 12 months; and any path for which a customer requests to have ATC or TTC posted. For this last category, the posting must continue for 180 days and thereafter until 180 days have elapsed from the most recent request for service over the requested path. For purposes of this definition, an hour includes any part of an hour during which service was denied, curtailed or interrupted.

(ii) Constrained Posted Path means any posted path having an ATC less than or equal to 25 percent of TTC at any time during the preceding 168 hours or for which ATC has been calculated to be less than or equal to 25 percent of TTC for any period during the current hour or the next 168 hours.

(iii) Unconstrained Posted Path means any posted path not determined to be a constrained posted path.

(2) Calculation methods, availability of information, and requests.

(i) Information used to calculate any posting of ATC and TTC must be dated and time-stamped and all calculations shall be performed according to consistently applied methodologies referenced in the Transmission Provider's transmission tariff and shall be based on current industry practices, standards and criteria.

(ii) On request, the Responsible Party must make all data used to calculate ATC and TTC for any constrained posted paths publicly available (including the limiting element(s) and the cause of the limit (e.g., thermal, voltage, stability)) in electronic form within one week of the posting. The information is required to be provided only in the electronic format in which it was created, along with any necessary decoding instructions, at a cost limited to the cost of reproducing the material. This information is to be retained for six months after the applicable posting period.

(iii) System planning studies or specific network impact studies performed for customers to determine network impacts are to be made publicly available in electronic form on request and a list of such studies shall be posted on the OASIS. A study is required to be provided only in the electronic format in which it was created, along with any necessary decoding instructions, at a cost limited to the cost of reproducing the material. These studies are to be retained for two years.

(3) Posting. The ATC and TTC for all Posted Paths must be posted in megawatts by specific direction and in the manner prescribed in this subsection.

(i) Constrained Posted Paths.

(A) For Firm ATC and TTC:

(1) The posting shall show ATC and TTC for a 30-day period. For this period postings shall be: by the hour, for the current hour and the 168 hours next following; and thereafter, by the day. If the Transmission Provider charges separately for on-peak and off-peak periods in its tariff, ATC and TTC will be posted daily for each period.

(2) Postings shall also be made by the month, showing for the current month and the 12 months next following.

(3) If planning and specific requested transmission studies have been done, seasonal capability shall be posted for the year following the



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current year and for each year following to the end of the planning horizon but not to exceed 10 years.

(B) For Non-Firm ATC and TTC. The posting shall show ATC and TTC for a 30-day period by the hour and days prescribed under paragraph (b)(3)(i)(A)(1) of this section and, if so requested, by the month and year as prescribed under paragraph (b)(3)(i)(A)(2) and (3) of this section.

(C) Updating Posted Information for Constrained Paths.

(1) The capability posted under paragraphs (b)(3)(i)(A) and (B) of this section must be updated when transactions are reserved or service ends or whenever the TTC estimate for the Path changes by more than 10 percent.

(2) All updating of hourly information shall be made on the hour.

(ii) Unconstrained Posted Paths.

(A) Postings of ATC and TTC shall be by the day, showing for the current day and the next six days following and thereafter, by the month for the 12 months next following. If the Transmission Provider charges separately for on-peak and off-peak periods in its tariff, ATC and TTC will be posted for the current day and the next six days following for each period. These postings are to be updated whenever the ATC changes by more than 20 percent of the Path's TTC.

(B) If planning and specific requested transmission studies have been done, seasonal capability shall be posted for the year following the current year and for each year following until the end of the planning horizon but not to exceed 10 years.

(c) Posting Transmission Service Products and Prices.

(1) Transmission Providers must post prices and a summary of the terms and conditions associated with all transmission products offered to Transmission Customers.

(2) Transmission Providers must provide a downloadable file of their complete tariffs in the same electronic format as the tariff is filed with the Commission.

(3) A Transmission Provider, within 24 hours of agreeing to sell transmission service to a non-affiliate at a discount (as measured from when ATC must be adjusted in response to the transaction), must post on the OASIS (and make available for download) information describing the transaction (including price, quantity, and any other relevant terms and conditions) and shall keep such information posted on the OASIS for at least 30 days. A record of the transaction must be retained and kept available as part of the audit log required in section 37.7. With respect to any discount offered to its own power customers or its affiliates, the Transmission Provider must, at the same time, post on the OASIS an offer to provide the same discount to all Transmission Customers on the same path and on all unconstrained transmission paths.

(4) Customers choosing to use the OASIS to offer for resale transmission capacity they have purchased must post relevant information to the same OASIS as used by the one from whom the Reseller purchased the transmission capacity. This information must be posted on the same display page, using the same tables, as similar capability being sold by the Transmission Provider, and the information must be



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contained in the same downloadable files as the Transmission Provider's own available capability. A customer reselling transmission capacity without the use of an OASIS must, nevertheless, inform the original Transmission Provider of the transaction within the time limits prescribed by the "Sale or Assignment of Transmission Service" section of the pro forma tariff.

(d) Posting Ancillary Service Offerings and Prices.

(1) Any ancillary service required to be provided or offered under the pro forma tariff prescribed by Part 35 of this Chapter must be posted with the price of that service.

(2) A Transmission Provider, within 24 hours of agreeing to sell an ancillary service to a non-affiliate at a discount, must post on the OASIS (and make available for download) information describing the transaction (including price, quantity, and any other relevant terms and conditions) and shall keep such information posted on the OASIS for at least 30 days. A record of the transaction must be retained and kept available as part of the audit log required in § 37.7. As to discounts for ancillary services, if a Transmission Provider offers a rate discount to an affiliate, or attributes a discounted ancillary service rate to its own transactions, the Transmission Provider must, at the same time, post on the OASIS an offer to provide the same discount to all eligible customers.

(3) Any other interconnected operations service offered by the Transmission Provider may be posted, with the price for that service.

(4) Any entity offering an ancillary service shall have the right to post the offering of that service on the OASIS if the service is one required to be offered by the Transmission Provider under the pro forma tariff prescribed by Part 35 of this Chapter. Any entity may also post any other interconnected operations service voluntarily offered by the Transmission Provider. Postings by customers and third parties must be on the same page, and in the same format, as postings of the Transmission Provider.

(e) Posting Specific Transmission Service Requests and Responses.

(1) General Rules.

(i) All requests for transmission service offered by Transmission Providers under the pro forma tariff must be made on the OASIS. Requests for transmission service, and the responses to such requests, must be conducted in accordance with the Transmission Provider's tariff, the Federal Power Act, and Commission regulations.

(ii) In processing a request for transmission or ancillary service, the Responsible Party shall post the following information: the date and time when the request is made, its place in any queue, the status of that request, and the result (accepted, denied, withdrawn).

(iii) The identity of the parties will be masked -- if requested -- during the negotiating period and for 30 days from the date when the request was accepted, denied or withdrawn.

(2) Posting when a request for transmission service is denied.

(i) When a request for service is denied, the Responsible Party must provide the reason for that denial as part of any response to the request.



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(ii) Information to support the reason for the denial, including the operating status of relevant facilities, must be maintained for 60 days and provided, upon request, to the potential Transmission Customer.

(iii) Any offer to adjust operation of the Transmission Provider's System to accommodate the denied request must be posted and made available to all Transmission Customers at the same time.

(3) Posting when a transaction is curtailed or interrupted.

(i) When any transaction is curtailed or interrupted, the curtailment or interruption must be posted (with the identities of the parties masked as required in § 37.6(e)(1)(iii)) and must state the reason why the transaction could not be continued or completed.

(ii) Information to support any such curtailment or interruption, including the operating status of the facilities involved in the constraint or interruption, must be maintained for 60 days and provided, upon request, to the curtailed or interrupted customer.

(iii) Any offer to adjust the operation of the Transmission Provider's system to restore a curtailed or interrupted transaction must be posted and made available to all curtailed and interrupted Transmission Customers at the same time.

(f) Posting Transmission Service Schedules Information. Information on transmission service schedules must be recorded by the entity scheduling the transmission service and must be available on the OASIS for download. Transmission service schedules must be posted no later than seven calendar days from the start of the transmission service.

(g) Posting Other Transmission-Related Communications.

(1) The posting of other communications related to transmission services must be provided for by the Responsible Party. These communications may include "want ads" and "other communications" (such as using the OASIS as a Transmission-related conference space or to provide transmission-related messaging services between OASIS users). Such postings carry no obligation to respond on the part of any market participant.

(2) The Responsible Party is responsible for posting other transmission-related communications in conformance with the instructions provided by the third party on whose behalf the communication is posted. It is the responsibility of the third party requesting such a posting to ensure the accuracy of the information to be posted.

(3) Posting Transfers. Notices of transfers of personnel as described in § 37.4(b)(2) shall be posted.

Standard 21. § 37.7 Auditing Transmission Service Information.

(a) All OASIS database transactions, except other transmission-related communications provided for under § 37.6(g)(2), must be stored, dated, and time stamped.

(b) Audit data must remain available for download on the OASIS for 90 days. The audit data are to be retained and made available upon request for three years from the date when they are first posted.



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**Standard 20.** § 37.8 Implementation schedule for OASIS requirements; phases.

Each Transmission Provider must develop or participate in an OASIS that meets the requirements of this Part and that is in operation by November 1, 1996. Each Transmission Provider must be in compliance with the standards of conduct prescribed in § 37.4 by November 1, 1996.



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**Date:** December 29, 2003

**Revised by the Executive Committee on February 24, 2004**

Page 31 of 32

The Standards are attached and provided as part of the following attached documents:

- Federal Energy Regulatory Commission Business Practice Standards for Open Access Same-Time Information System (OASIS) Transactions, Version 1.2, issued October 25, 2000 (Attachment A).
- Standards and Communication Protocols for Open Access Same-Time Information System (OASIS), Version 1.4, July 26, 2000 (Attachment B).
- Data Dictionary, Standards and Communication Protocols for Open Access Same-Time Information System (OASIS), Version 1.41, July 26, 2001 (Attachment C)
- Deleted (Attachment D).
- Oasis Version 1.4 corrections, outlined in a letter dated January 30, 2001, from Paul R. Sorenson, OSC Chair, to David P. Borgers, Office of the Secretary, Federal Energy Regulatory Commission (Attachment E).
- FERC Order 605 (Attachment F).
- FERC Order 889 (Attachment G).
- FERC Order 889 Appendix A Data Element Dictionary (Attachment H).
- FERC Order 889 Appendix B Request (Query) Variables (Attachment I).

#### **4. SUPPORTING DOCUMENTATION**

##### **a. Description of Request:**

Request submitted by Southern Company Services, proposing the WEQ's acceptance of the current OASIS Business Practice Standards and Communication Protocol Standards.

##### **b. Description of Recommendation:**

Recommend acceptance as requested.

##### **c. Business Purpose:**

The business practice standards are designed to implement the Commission's policy related to on-line price negotiation and to improve the commercial operation of the Open Access Same-Time Information System (OASIS).





## RECOMMENDATION TO NAESB WEQ EXECUTIVE COMMITTEE

**Requester:** Southern Company Services

**Request No.:** R04005

**Date:** December 29, 2003

**Revised by the Executive Committee on February 24, 2004**

Page 32 of 32

### **d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

The Electronic Scheduling Subcommittee met on December 15-16, 2003 and via conference call on January 8, 2004. The minutes and work papers can be accessed via the NAESB web site ([http://www.naesb.org/weq/weq\\_electronic\\_scheduling.asp](http://www.naesb.org/weq/weq_electronic_scheduling.asp)). On January 8, the subcommittee unanimously endorsed sending the recommendation out for industry comment.



## North American Energy Standards Board

1301 Fannin, Suite 2350, Houston, Texas 77002

Phone: (713) 356-0060, Fax: (713) 356-0067, E-mail: [naesb@naesb.org](mailto:naesb@naesb.org)

Home Page: [www.naesb.org](http://www.naesb.org)

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**via email**

**TO:** NAESB Wholesale Electric Quadrant Members  
**FROM:** Todd Oncken, Deputy Director  
**RE:** Member Ratification of Standards Adopted by the Wholesale Electric Quadrant of the Executive Committee  
**DATE:** November 19, 2004

---

Please find the attached ballot to record your vote on the ratification of five recommendations approved by the Executive Committee on November 16, 2004. The draft minutes for this meeting will be available on the NAESB web site by November 24, and the recommendations are available on the NAESB web site. To record your vote, please fill out page two of this communication and either email ([naesb@naesb.org](mailto:naesb@naesb.org)) or fax it (713-356-0067) to our office by December 30, 2004. Should the recommendations be ratified, they will be available for use as final actions prior to publication of NAESB WEQ standards.

The EC voting record and discussion on these items is contained within the EC minutes of November 16, 2004. Links to the EC minutes, request, and related subcommittee and task force minutes can be found on the NAESB WEQ main page (<http://www.naesb.org/weq/default.asp>). The recommendations can be found on the Member Ratification of Standards and Board Actions page of the NAESB web site (<http://www.naesb.org/ratification.asp>), and links to the recommendations are also provided in the ballot itself. Transcripts of the EC meeting where these recommendations were discussed can be ordered by calling the NAESB office – 713-356-0060.

Please feel free to call the NAESB office if you have any difficulty retrieving any of this information.

Best Regards,

*Todd Oncken*

cc: Rae McQuade, Executive Director

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# North American Energy Standards Board

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**NAESB Membership Ratification Ballot for Wholesale Electric Quadrant Standards  
Due December 30, 2004  
To NAESB Office (Fax Number 713-356-0067, email [naesb@naesb.org](mailto:naesb@naesb.org))**

Please vote in favor of or in opposition to the Executive Committee (EC) action taken on November 16, 2004:

Support	Oppose	Action:
		<b>Recommendation R04005A (OASIS Baseline Cleanup):</b> Adopt current OASIS business practices in FERC Orders 605, 638 & 889 as WEQ standards. <a href="http://www.naesb.org/protected/rat_weq111904a2.doc">http://www.naesb.org/protected/rat_weq111904a2.doc</a>
		<b>Recommendation R04011 (OASIS Requirements for FERC Order 2003 - Large Generator Interconnection):</b> Conform WEQ OASIS standards to FERC Order 2003 (Large Generator Interconnection Order). <a href="http://www.naesb.org/protected/rat_weq111904a1.doc">http://www.naesb.org/protected/rat_weq111904a1.doc</a>
		<b>Recommendation R04006A (OASIS 1A Enhancements - Standards of Conduct):</b> Develop OASIS Phase 1A business practices. <a href="http://www.naesb.org/protected/rat_weq111904a3.doc">http://www.naesb.org/protected/rat_weq111904a3.doc</a>
		<b>Recommendation R04006B (OASIS 1A Enhancements - Multiple Requests):</b> Develop OASIS Phase 1A business practices. <a href="http://www.naesb.org/protected/rat_weq111904a4.doc">http://www.naesb.org/protected/rat_weq111904a4.doc</a>
		<b>Recommendation R04006C (OASIS 1A Enhancements - Redirects):</b> Develop OASIS Phase 1A business practices. <a href="http://www.naesb.org/protected/rat_weq111904a5.doc">http://www.naesb.org/protected/rat_weq111904a5.doc</a>

Member Name:	_____
Member Signature:	_____
Member Company:	_____
Segment:	_____
Date:	_____



# North American Energy Standards Board

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## NAESB Wholesale Electric Quadrant Members as of November 19, 2004

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<b>NAESB WEQ Member</b>	<b>Member Contact</b>
ACES Power Marketing LLC	Roy J. True
Alabama Electric Cooperative, Inc.	Kenneth J. Skroback
American Electric Power Service Corp.	Thomas Ringenbach
American Electric Power Service Corp.	Barbara Radous
American Electric Power Service Corp.	Joseph Hartsoe
American Electric Power Service Corp.	John Stough
American Electric Power Service Corp.	Michael Desselle
American Municipal Power - Ohio, Inc.	Pat Frazier
American Municipal Power - Ohio, Inc.	Chris Norton
American Transmission Company LLC	Julie Voeck
Arizona Public Service Company	Mark W. Hackney
Arkansas Electric Cooperative Corporation	Ricky Bittle
Avista Corp.	Scott A. Waples
Basin Electric Power Cooperative	Jason Doerr
Basin Electric Power Cooperative	David Raatz
Basin Electric Power Cooperative	Dan Klempel
Boeing Company, The	Steve LaFond
Bonneville Power Administration	Sydney D. Berwager
Bonneville Power Administration	Francis Halpin
Bonneville Power Administration	Brenda Anderson
Bonneville Power Administration	Barbara Rehman
BP America Inc.	Jeanne Zaiontz
Buckeye Power, Inc.	Peter H. Buros
Calpine Corporation	William Taylor
Calpine Corporation	Jim Stanton
Cap Gemini Ernst and Young	Stephen A. Behrens
Central Electric Power Cooperative	Arthur Fusco
ChevronTexaco Energy Research and Technology	Carol Guthrie
Cinergy	Ron Jackups
Cinergy	Walt Yeager
Cinergy	Ron Jackups
Cinergy	Walt Yeager
Cinergy	Ron Jackups
Cleco Power, LLC	Keith Comeaux
Columbus Southern Power Company	Phil Cox
Comprehensive Energy Services	Jim Templeton
Conectiv Energy Supply, Inc.	Gloria Ogenyi
Conectiv Energy Supply, Inc.	Gloria Ogenyi
Conectiv Power Delivery	Ken Gates
Constellation NewEnergy, Inc.	Sara O'Neill
Consumers Energy Company	Andrew C. Dotterweich
Consumers Energy Company	Frank Johnson
Consumers Energy Company	Steven L. Gaarde
Consumers Energy Company	Andrew C. Dotterweich
Consumers Energy Company	John J. Dellas
Dairyland Power Cooperative	Chuck Callies
Department of the Interior, US Bureau of Reclamation	Deborah M. Linke
Dominion Energy Marketing, Inc.	Louis Oberski
Duke Energy Corp.	Ollie Frazier
Duke Energy North America	Bill D. Blevins
Dynegy Power Marketing, Inc.	Barry Huddleston
Edison Electric Institute	David Owens
Edison Electric Institute	Dave Dworzak

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### NAESB WEQ Member

Electric Reliability Council of Texas (ERCOT)

ElectricCities of North Carolina  
(North Carolina Eastern Municipal Power Agency)  
Electricity Consumers Resource Council (ELCON)

Empire District Electric Company, The  
Energy East Management Corporation  
Entergy Services, Inc.  
Entergy Services, Inc.

Exelon Corporation - PECO Energy  
Exelon Generation - Power Team  
ExxonMobil Gas Marketing

FirstEnergy Solutions Corp.  
Florida Municipal Power Agency  
Florida Municipal Power Agency  
Florida Power & Light Company  
Florida Power & Light Company  
Florida Reliability Coordinating Council  
Georgia Transmission Corporation  
Hydro - Quebec Transenergie  
Hydro One Networks  
Indiana Municipal Power Agency  
International Transmission Company  
Michigan Electric Transmission Company LLC  
Michigan Public Power Agency

Midwest Independent Transmission System Operator  
Mirant Corp.

Missouri River Energy Services  
Modesto Irrigation District  
National Association of Regulatory Utility Commissioners  
National Grid USA

National Rural Electric Cooperative Assoc.  
Navigant Consulting, Inc.  
New York State Dept. of Public Service  
North Carolina Electric Membership Corporation  
North Carolina Electric Municipal Power Agency #1  
North Carolina Electric Municipal Power Agency #1  
Northeast Utilities Service Company

Oglethorpe Power Corporation  
Ohio Consumers Council  
Old Dominion Electric Cooperative  
Ontario Power Generation  
Ontario Power Generation  
Open Access Technology International, Inc.  
PacifiCorp  
PacifiCorp

### Member Contact

Sam R. Jones  
Ray Giuliani  
Gregory Locke

John Anderson  
John Hughes  
Bary K. Warren  
Marjorie Perlman  
James M. (Jimmy) Smith  
Edward J. Davis  
John H. Zemanek  
John F. Leonard, Jr.  
Jack Crowley  
Steve Sayuk  
Mark Scheel  
Mark Ulrich  
Edward C. Stein  
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Rick Casey  
Joe Stepenovitch  
Marty Mennes  
Linda D. Campbell  
Nina McNeive  
Victor Bissonnette  
Dave Barrie  
Dick Foltz  
Jim D. Cyrulewski  
Charles V. Waits  
James R. Nickel  
Daniel E. Cooper  
William (Bill) Phillips  
Alde Warnock  
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Roger Van Hoy  
Lou Ann Westerfield  
Masheed Rosenqvist  
Peter Flynn  
Mary Ellen Paravalos  
Barry Lawson  
Richard G.. Smead  
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Bill P. McKinnon  
Billy Ussery  
Randy Corbin  
James N. Kimball  
Barry Green  
Ron Robinson  
Kevin Burns  
Greg Maxfield  
Edison G. Elizeh

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# North American Energy Standards Board

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<b>NAESB WEQ Member</b>	<b>Member Contact</b>
PacifiCorp	Jim Hicks
Platte River Power Authority	Darrell Gerrard
Portland General Electric	Terry L. Baker
PPL Electric Utilities Corporation	Terri Peschka
PPM Energy, Inc.	Ray Mammarella
PPM Energy, Inc.	Don Winslow
Progress Energy	Don Winslow
Progress Energy	Micheal Settlege
	Verne Ingersoll
	Phillip W. Lewis
PSEG Energy Resources and Trade LLC	James D. Hebson
PSEG Power LLC	Thomas M. Piascik
Public Service Electric and Gas Company	Colin J. Loxley
Public Service Electric and Gas Company	Jeffrey C. Mueller
Puget Sound Energy, Inc.	George Marshall
	Bob Harshbarger
Sacramento Municipal Utility District	Robert D. Schwermann
Sacramento Municipal Utility District	Thomas Ingwers
Salt River Project Agricultural Improvement and Power District	Wendy Weathers
	Mark B. Bonsall
Salt River Project Agricultural Improvement and Power District	Steve Cobb
Seminole Electric Cooperative, Inc.	Lane Mahaffey
Southeastern Power Administration	Bob Goss
Southern California Edison	Ronald D. Nunnally
Southern Company Services, Inc.	Gary Rozier
	Jim Miller
	Greg Butrus
Southern Company Services, Inc.	Tony A. Reed
Southern Company Services, Inc.	Joel Dison
Southern Company Services, Inc.	R.D. (Dean) Ulch
	John Lucas
Southwest Power Pool	Carl Monroe
Southwest Transmission Cooperative, Inc.	Larry D. Huff
Southwestern Power Administration	Forrest E. Reeves
Southwestern Power Administration	Stanley L. Mason
Sunflower Electric Power Corporation	L. Earl Watkins
	Carroll Waggoner
	Scott Helyer
Tenaska, Inc.	Ron L. Owens
Tennessee Valley Authority	William F. Irish
Tennessee Valley Authority	Jim A. Ingraham
Tennessee Valley Authority	Mitchell Needham
Tennessee Valley Authority	W. Terry Boston
TRANS-ELECT, INC.	Paul D. McCoy
Tri-State Generation and Transmission Association, Inc.	Bruce Sembrick
TXU Business Services	Elizabeth Howland
TXU Electric Delivery	Ellis Rankin
	Debbie McKeever
UBS Energy LLC	Suzanne Calcagno
Vermont Public Power Supply Authority	William J. Gallagher
We Energies (Wisconsin Electric)	Linda Horn
We Energies (Wisconsin Electric)	James R. Keller
Western Area Power Administration	Jeffrey Ackerman
Western Area Power Administration	Mark Fidrych
Wisconsin Public Power Inc.	Mike Stuart

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## NAESB WEQ Member

Wisconsin Public Service Corporation

Xcel Energy Inc.

---

## Member Contact

William Bourbonnais

Charles W. Severance

Steven J. Beuning

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**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: Bonneville Power Administration**  
**Request No.: R04011**  
**Request Title: OASIS Requirments for FERC Order 2003 -  
 Generation Interconnection**

**Approved by the Executive Committee on November 16, 2004**

**1. RECOMMENDED ACTION:**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT  
RECOMMENDED ACTION:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:**

Modify the OASIS Standards & Communications Protocols (S&CP) to address the postings of information on OASIS as directed by a regulatory order, such as the FERC Order 2003, Docket No. RM 02-1- 000, Standardization of Generator Interconnection Agreements and Procedures, Issued July 24, 2003. Although the original request was specific to FERC Order 2003, this recommendation was developed to be more generic and would therefore handle future informational posting requirements as well.

**RECOMMENDED STANDARDS:**





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: Bonneville Power Administration  
Request No.: R04011  
Request Title: OASIS Requirments for FERC Order 2003 -  
Generation Interconnection**

**Approved by the Executive Committee on November 16, 2004**

#### 4.5 INFORMATION SUPPORTED BY WEB PAGE

When a regulatory order requires informational postings on OASIS and there is no OASIS S&CP template to support the postings or it is deemed inappropriate to use a template, there shall be a reference in INFO.HTM to the required information, information that must be posted on INFO.HTM, as per Section 3.4 b, includesincluding, but not limited to, references to the following:

- o There shall be a reference in INFO.HTM to ~~A~~a common source of interconnection wide curtailment and interruption information, such as the NERC Transmission Loading Relief (TLR) web site.
- o There shall be a reference in INFO.HTM to ~~i~~information related to the Transmission Provider's methodology for computing and application of Capacity Benefit Margin (CBM) and Transmission Reliability Margin (TRM). If the Transmission Provider does not use CBM or TRM in their assessment of Available Transmission Capability (ATC), that information shall also be in INFO.HTM.
- o There shall be a reference in INFO.HTM to ~~t~~The location of the list of system studies conducted. There shall be a reference in INFO.HTM to the location of the company's organizational chart, job descriptions and personnel names as referenced in Section 3.4 k.
- o There shall be a reference on INFO.HTM to ~~i~~information on requesting the text file of the tariffs and service agreements.

For the purposes of this section, any link to required informational postings that can be accessed from INFO.HTM would be considered to have met the OASIS posting requirements, provided that the linked information meets all other OASIS accessability requirements.

#### 4. SUPPORTING DOCUMENTATION

##### a. Description of Request:

Request submitted by Bonneville Power Administration to review and investigate possible standards creation associated with OASIS posting requirements under regulatory orders, such as the FERC Order 2003, Docket No. RM 02-1- 000, Standardization of Generator Interconnection Agreements and Procedures, Issued July 24, 2003.

##### b. Description of Recommendation:



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: Bonneville Power Administration  
Request No.: R04011  
Request Title: OASIS Requirments for FERC Order 2003 -  
Generation Interconnection**

**Approved by the Executive Committee on November 16, 2004**

Recommend acceptance as requested.

**c. Business Purpose:**

The business practice standards are designed to support the informational postings as required by FERC.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

This request was discussed at the February 16-17, 2004 Information Technology Subcommittee (ITS) meeting ([http://www.naesb.org/weq/weq\\_info\\_technology.asp](http://www.naesb.org/weq/weq_info_technology.asp)), April 6, 2004 ITS and Electronic Scheduling Subcommittee (ESS) joint meeting ([http://www.naesb.org/weq/weq\\_info\\_technology.asp](http://www.naesb.org/weq/weq_info_technology.asp)), May 13, 2004 OASIS 1A Task Force Meeting ([http://www.naesb.org/weq/weq\\_oasis\\_1a.asp](http://www.naesb.org/weq/weq_oasis_1a.asp)), May 26-27, 2004 ITS and ESS joint meeting ([http://www.naesb.org/weq/weq\\_info\\_technology.asp](http://www.naesb.org/weq/weq_info_technology.asp)), July 9, 2004 OASIS 1A Task Force Meeting ([http://www.naesb.org/weq/weq\\_oasis\\_1a.asp](http://www.naesb.org/weq/weq_oasis_1a.asp)), July 14 OASIS 1A Task Force Meeting ([http://www.naesb.org/weq/weq\\_oasis\\_1a.asp](http://www.naesb.org/weq/weq_oasis_1a.asp)), and July 28-29, 2004 ITS and ESS joint meeting ([http://www.naesb.org/weq/weq\\_info\\_technology.asp](http://www.naesb.org/weq/weq_info_technology.asp)).



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Southern Company Services**

**Request No.: R04005-A**

**Request Title: OASIS Baseline**

**Approved by the Executive Committee on 11/16/2004**

**1. RECOMMENDED ACTION:**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:**

This recommendation makes modifications to the NAESB OASIS 1A Business Practices (ratified Spring 2004) as follows:

1. Addition of Standard 1
2. Standards 8-21, with exceptions for Standards 15-16, consolidated as subsections 1.1-1.8 of Standard 1
3. Standards 15 and 16 deleted as a standard but retained as introductory sections to Standard 1.
4. Standard 22 deleted as not applicable
5. Many external references were changed, where appropriate, to be internal references (e.g., references to "Section 37" changed to "Standard 1")



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Southern Company Services**

**Request No.: R04005-A**

**Request Title: OASIS Baseline**

**Approved by the Executive Committee on 11/16/2004**

6. Minor, non material reformatting
7. Some material changes to Standards 1.1-1.7 reflecting the most recent Federal regs – original requirements inadvertently contained older language (see commentary in Supporting Documentation section below).
8. Deletion of Standard 1.4, Standards of Conduct.

**RECOMMENDED STANDARDS:**

**Standard 1: Provision of Open Access Transmission Service.** All transmission providers shall provide open access transmission service in accordance with the following requirements.

Applicability

Standard 1 applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce and to transactions performed under the pro forma tariff required under currently applicable regulations.

Purpose

(a) The purpose of Standard 1 is to ensure that potential customers of open access transmission service receive access to information that will enable them to obtain transmission service on a non-discriminatory basis from any Transmission Provider. These rules provide standards of conduct and require the Transmission Provider (or its agent) to create and operate an Open Access Same-time Information System (OASIS) that gives all users of the open access transmission system access to the same information.

(b) The OASIS will provide information by electronic means about available transmission capability for point-to-point service and will provide a process for requesting transmission service. OASIS will enable Transmission Providers and Transmission Customers to communicate promptly requests and responses to buy and sell available transmission capacity offered under the Transmission Provider's tariff.

**Standard 1.1: RESERVED**

**Standard 1.2: RESERVED**

**Standard 1.3: Definitions.**

(a) Transmission Provider means any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: Southern Company Services**

**Request No.: R04005-A**

**Request Title: OASIS Baseline**

**Approved by the Executive Committee on 11/16/2004**

(b) Transmission Customer means any eligible customer (or its designated agent) that can or does execute a transmission service agreement or can or does receive transmission service.

(c) Responsible party means the Transmission Provider or an agent to whom the Transmission Provider has delegated the responsibility of meeting any of the requirements of this part.

(d) Reseller means any Transmission Customer who offers to sell transmission capacity it has purchased.

(e) Wholesale merchant function means the sale for resale of electric energy in interstate commerce.

(f) Affiliate means:

(1) For any exempt wholesale generator, as defined under section 32(a) of the Public Utility Holding Company Act of 1935, as amended, the same as provided in section 214 of the Federal Power Act; and

(2) For any other entity, the term affiliate has the same meaning as given in 18 CFR 161.2(a).

(g) Commission shall mean the Federal Energy Regulatory Commission.

**Standard 1.4:** Reserved.

**Standard 1.5:** Obligations of Transmission Providers and Responsible Parties.

(a) Each Transmission Provider is required to provide for the operation of an OASIS, either individually or jointly with other Transmission Providers, in accordance with the requirements of these Standards. The Transmission Provider may delegate this responsibility to a Responsible Party such as another Transmission Provider, an Independent System Operator, a Regional Transmission Group, or a Regional Reliability Council.

(b) A Responsible Party must:

(1) Provide access to an OASIS providing standardized information relevant to the availability of transmission capacity, prices, and other information (as described in these Standards) pertaining to the transmission system for which it is responsible;

(2) Operate the OASIS in compliance with the standardized procedures and protocols found in the NAESB Standards and Communication Protocols for Open Access Same Time Information Systems; and



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: Southern Company Services**

**Request No.: R04005-A**

**Request Title: OASIS Baseline**

**Approved by the Executive Committee on 11/16/2004**

(3) Operate the OASIS in compliance with the Business Practice Standards for Open Access Same-time Information System (OASIS) Transactions set forth herein.

(c) A Responsible Party may not deny or restrict access to an OASIS user merely because that user makes automated computer-to-computer file transfers or queries, or extensive requests for data.

(d) In the event that an OASIS user's grossly inefficient method of accessing an OASIS node or obtaining information from the node seriously degrades the performance of the node, a Responsible Party may limit a user's access to the OASIS node without prior Commission approval. The Responsible Party must immediately contact the OASIS user to resolve the problem. Notification of the restriction must be made to the Commission within two business days of the incident and include a description of the problem. A closure report describing how the problem was resolved must be filed with the Commission within one week of the incident.

(e) In the event that an OASIS user makes an error in a query, the Responsible Party can block the affected query and notify the user of the nature of the error. The OASIS user must correct the error before making any additional queries. If there is a dispute over whether an error has occurred, the procedures in paragraph (d) of this section apply.

(f) Transmission Providers must provide "read only" access to the OASIS to Commission staff and the staffs of State regulatory authorities, at no cost, after such staff members have complied with the requisite registration procedures.

**Standard 1.6:** Information to be posted on the OASIS.

(a) The information posted on the OASIS must be in such detail and the OASIS must have such capabilities as to allow Transmission Customers to:

(1) Make requests for transmission services offered by Transmission Providers, Resellers and other providers of ancillary services;

(2) View and download in standard formats, using standard protocols, information regarding the transmission system necessary to enable prudent business decision making;

(3) Post, view, upload and download information regarding available products and desired services;

(4) Clearly identify the degree to which transmission service requests or schedules were denied or interrupted;



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(5) Obtain access, in electronic format, to information to support available transmission capability calculations and historical transmission service requests and schedules for various audit purposes; and

(6) Make file transfers and automated computer-to-computer file transfers and queries as defined by the Standards and Communications Protocols Document.

(b) Posting transmission capability. The transmission capability that is expected to be available on the Transmission Provider's system (ATC) and the total transmission capability (TTC) of that system shall be calculated and posted for each Posted Path as set out in this section.

(1) Definitions. For purposes of this section the terms listed below have the following meanings:

(i) Posted path means any control area to control area interconnection; any path for which service is denied, curtailed or interrupted for more than 24 hours in the past 12 months; and any path for which a customer requests to have ATC or TTC posted. For this last category, the posting must continue for 180 days and thereafter until 180 days have elapsed from the most recent request for service over the requested path. For purposes of this definition, an hour includes any part of an hour during which service was denied, curtailed or interrupted.

(ii) Constrained posted path means any posted path having an ATC less than or equal to 25 percent of TTC at any time during the preceding 168 hours or for which ATC has been calculated to be less than or equal to 25 percent of TTC for any period during the current hour or the next 168 hours.

(iii) Unconstrained posted path means any posted path not determined to be a constrained posted path.

(iv) The word interconnection, as used in the definition of "posted path", means all facilities connecting two adjacent systems or control areas.

(2) Calculation methods, availability of information, and requests.

(i) Information used to calculate any posting of ATC and TTC must be dated and time-stamped and all calculations shall be performed according to consistently applied methodologies referenced in the Transmission Provider's transmission tariff and shall be based on current industry practices, standards and criteria.

(ii) On request, the Responsible Party must make all data used to calculate ATC and TTC for any constrained posted paths publicly available (including the limiting element(s) and the cause of the limit



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(e.g., thermal, voltage, stability)) in electronic form within one week of the posting. The information is required to be provided only in the electronic format in which it was created, along with any necessary decoding instructions, at a cost limited to the cost of reproducing the material. This information is to be retained for six months after the applicable posting period.

(iii) System planning studies or specific network impact studies performed for customers to determine network impacts are to be made publicly available in electronic form on request and a list of such studies shall be posted on the OASIS. A study is required to be provided only in the electronic format in which it was created, along with any necessary decoding instructions, at a cost limited to the cost of reproducing the material. These studies are to be retained for two years.

(3) Posting. The ATC and TTC for all Posted Paths must be posted in megawatts by specific direction and in the manner prescribed in this subsection.

(i) Constrained posted paths—

(A) For Firm ATC and TTC.

(1) The posting shall show ATC and TTC for a 30-day period. For this period postings shall be: by the hour, for the current hour and the 168 hours next following; and thereafter, by the day. If the Transmission Provider charges separately for on-peak and off-peak periods in its tariff, ATC and TTC will be posted daily for each period.

(2) Postings shall also be made by the month, showing for the current month and the 12 months next following.

(3) If planning and specific requested transmission studies have been done, seasonal capability shall be posted for the year following the current year and for each year following to the end of the planning horizon but not to exceed 10 years.

(B) For Non-Firm ATC and TTC. The posting shall show ATC and TTC for a 30-day period by the hour and days prescribed under paragraph (b)(3)(i)(A)(1) of this standard and, if so requested, by the month and year as prescribed under paragraph (b)(3)(i)(A) (2) and (3) of this standard.

(C) Updating Posted Information for Constrained Paths.





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(1) The capability posted under paragraphs (b)(3)(i) (A) and (B) of this standard must be updated when transactions are reserved or service ends or whenever the TTC estimate for the Path changes by more than 10 percent.

(2) All updating of hourly information shall be made on the hour.

(ii) Unconstrained posted paths.

(A) Postings of firm and nonfirm ATC and TTC shall be posted separately by the day, showing for the current day and the next six days following and thereafter, by the month for the 12 months next following. If the Transmission Provider charges separately for on-peak and off-peak periods in its tariff, ATC and TTC will be posted separately for the current day and the next six days following for each period. These postings are to be updated whenever the ATC changes by more than 20 percent of the Path's TTC.

(B) If planning and specific requested transmission studies have been done, seasonal capability shall be posted for the year following the current year and for each year following until the end of the planning horizon but not to exceed 10 years.

(c) Posting Transmission Service Products and Prices.

(1) Transmission Providers must post prices and a summary of the terms and conditions associated with all transmission products offered to Transmission Customers.

(2) Transmission Providers must provide a downloadable file of their complete tariffs in the same electronic format as the tariff that is filed with the Commission.

(3) Any offer of a discount for any transmission service made by the Transmission Provider must be announced to all potential customers solely by posting on the OASIS.

(4) For any transaction for transmission service agreed to by the Transmission Provider and a customer, the Transmission Provider (at the time when ATC must be adjusted in response to the transaction), must post on the OASIS (and make available for download) information describing the transaction (including: price; quantity; points of receipt and delivery; length and type of service; identification of whether the transaction involves the Transmission Provider's wholesale merchant function or any affiliate; identification of what, if any, ancillary service transactions are associated with this transmission service transaction; and any



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other relevant terms and conditions) and shall keep such information posted on the OASIS for at least 30 days. A record of the transaction must be retained and kept available as part of the audit log required in Standard 1.7.

(5) Customers choosing to use the OASIS to offer for resale transmission capacity they have purchased must post relevant information to the same OASIS as used by the one from whom the Reseller purchased the transmission capacity. This information must be posted on the same display page, using the same tables, as similar capability being sold by the Transmission Provider, and the information must be contained in the same downloadable files as the Transmission Provider's own available capability. A customer reselling transmission capacity without the use of an OASIS must, nevertheless, inform the original Transmission Provider of the transaction within any time limits prescribed by the Transmission Provider's tariff or in a contract or service agreement between the Transmission Provider and a customer.

**(d) Posting Ancillary Service Offerings and Prices.**

(1) Any ancillary service required to be provided or offered under the pro forma tariff required under currently applicable regulations must be posted with the price of that service.

(2) Any offer of a discount for any ancillary service made by the Transmission Provider must be announced to all potential customers solely by posting on the OASIS.

(3) For any transaction for ancillary service agreed to by the Transmission Provider and a customer, the Transmission Provider (at the time when ATC must be adjusted in response to an associated transmission service transaction, if any), must post on the OASIS (and make available for download) information describing the transaction (including: date and time when the agreement was entered into; price; quantity; length and type of service; identification of whether the transaction involves the Transmission Provider's wholesale merchant function or any affiliate; identification of what, if any, transmission service transactions are associated with this ancillary service transaction; and any other relevant terms and conditions) and shall keep such information posted on the OASIS for at least 30 days. A record of the transaction must be retained and kept available as part of the audit log required in Standard 1.7.

(4) Any other interconnected operations service offered by the Transmission Provider may be posted, with the price for that service.

(5) Any entity offering an ancillary service shall have the right to post the offering of that service on the OASIS if the service is one required to be offered by the Transmission Provider under their pro forma tariff. Any entity may also post any other interconnected operations service voluntarily offered by the



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Transmission Provider. Postings by customers and third parties must be on the same page, and in the same format, as postings of the Transmission Provider.

(e) Posting specific transmission and ancillary service requests and responses—

(1) General rules.

(i) All requests for transmission and ancillary service offered by Transmission Providers under the pro forma tariff, including requests for discounts, must be made on the OASIS, and posted prior to the Transmission Provider responding to the request, except as discussed in paragraphs (e)(1) (ii) and (iii). The Transmission Provider must post all requests for transmission service and for ancillary service comparably. Requests for transmission and ancillary service, and the responses to such requests, must be conducted in accordance with the Transmission Provider's tariff, and all currently applicable laws and regulations.

(ii) The requirement in paragraph (e)(1)(i) of this standard, to post requests for transmission and ancillary service offered by Transmission Providers under the pro forma tariff, including requests for discounts, prior to the Transmission Provider responding to the request, does not apply to requests for next-hour service made during Phase I.

(iii) In the event that a discount is being requested for ancillary services that are not in support of basic transmission service provided by the Transmission Provider, such request need not be posted on the OASIS.

(iv) In processing a request for transmission or ancillary service, the Responsible Party shall post the same information as required in Standard 1.6(c)(4), Standard 1.6(d)(3), and the following information: the date and time when the request is made, its place in any queue, the status of that request, and the result (accepted, denied, withdrawn).

(2) Posting when a request for transmission service is denied.

(i) When a request for service is denied, the Responsible Party must provide the reason for that denial as part of any response to the request.

(ii) Information to support the reason for the denial, including the operating status of relevant facilities, must be maintained for 60 days and provided, upon request, to the potential Transmission Customer.

(iii) Any offer to adjust operation of the Transmission Provider's System to accommodate the denied request must be posted and made available to all Transmission Customers at the same time.

(3) Posting when a transaction is curtailed or interrupted.



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(i) When any transaction is curtailed or interrupted, the Transmission Provider must post notice of the curtailment or interruption on the OASIS, and the Transmission Provider must state on the OASIS the reason why the transaction could not be continued or completed.

(ii) Information to support any such curtailment or interruption, including the operating status of the facilities involved in the constraint or interruption, must be maintained and made available upon request, to the curtailed or interrupted customer, the Commission's Staff, and any other person who requests it, for three years.

(iii) Any offer to adjust the operation of the Transmission Provider's system to restore a curtailed or interrupted transaction must be posted and made available to all curtailed and interrupted Transmission Customers at the same time.

(f) Posting Transmission Service Schedules Information. Information on transmission service schedules must be recorded by the entity scheduling the transmission service and must be available on the OASIS for download. Transmission service schedules must be posted no later than seven calendar days from the start of the transmission service.

(g) Posting Other Transmission-Related Communications.

(1) The posting of other communications related to transmission services must be provided for by the Responsible Party. These communications may include "want ads" and "other communications" (such as using the OASIS as a Transmission-related conference space or to provide transmission-related messaging services between OASIS users). Such postings carry no obligation to respond on the part of any market participant.

(2) The Responsible Party is responsible for posting other transmission-related communications in conformance with the instructions provided by the third party on whose behalf the communication is posted. It is the responsibility of the third party requesting such a posting to ensure the accuracy of the information to be posted.

(3) Notices of transfers of personnel shall be posted as described in Standard 1.4(b)(2). The posting requirements are the same as those provided in Standard 1.7 for audit data postings.

(4) Logs detailing the circumstances and manner in which a Transmission Provider or Responsible Party exercised its discretion under any terms of the tariff shall be posted as described in Standard 1.4(b)(5)(iii). The posting requirements are the same as those provided in Standard 1.7 for audit data postings.



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**Standard 1.7:** Auditing Transmission Service Information.

(a) All OASIS database transactions, except other transmission-related communications provided for under Standard 1.6(g)(2), must be stored, dated, and time stamped.

(b) Audit data must remain available for download on the OASIS for 90 days, except ATC/TTC postings that must remain available for download on the OASIS or 20 days. The audit data are to be retained and made available upon request for download for three years from the date when they are first posted in the same electronic form as used when they originally were posted on the OASIS.

**Standard 1.8:** Obligations of OASIS users.

Each OASIS user must notify the Responsible Party one month in advance of initiating a significant amount of automated queries. The OASIS user must also notify the Responsible Party one month in advance of expected significant increases in the volume of automated queries.



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**Standard 2.0 Standard Terminology for Transmission and Ancillary Services**

**Attribute Values Defining the Period of Service**

The data templates of the most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems have been developed with the use of standard service attributes in mind. What the most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems does not offer are specific definitions for each attribute value. This section offers standards for these services attribute definitions to be used in conjunction with the Phase IA data templates.

Fixed services are associated with transmission services whose periods align with calendar periods such as a day, week, or month. Sliding services are fixed in duration, such as a week or month, but the start and stop time may slide. For example a Sliding week could start on Tuesday and end on the following Monday. Extended allows for services in which the start time may slide and also the duration may be longer than a standard length. For example an Extended week of service could be nine consecutive days. Various transmission service offerings using these terms are defined in Standards 2.1.1 through 2.1.14 below. Next\_Increment indicates the next available full Service\_Increment, such as the next hour, next day, or next week. Next\_Increment is added at this time to address Next Hour Market Service, but may be used in the future to denote other products.

Table 2-1 identifies the standard terminology in OASIS Phase IA for the attributes SERVICE\_INCREMENT (Hourly, Daily, Weekly, Monthly, and Yearly) and TS\_WINDOW (Fixed, Sliding, Extended, and Next\_Increment). Values shown in Table 2-1 as N/A (Not Applicable) are not sufficiently common in the market to require standards.

Next Hour Market Service, a new pro forma service, is denoted as having a Service Increment of Hourly and a TS\_WINDOW of Next\_Increment.

**Table 2-1  
Standard Service Period Attribute Values in Phase IA**

	<b>Fixed</b>	<b>Sliding</b>	<b>Extended <sup>1</sup></b>	<b>Next_Increment</b>
Hourly	X	N/A	N/A	X <sup>2</sup>
Daily	X	X	X	N/A
Weekly	X	X	X	N/A
Monthly	X	X	X	N/A
Yearly	X	X	X	N/A

<sup>1</sup>Included in the most current version of the Data Dictionary for the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems

<sup>2</sup>Next Hour Market Service is identified by Service Increment = Hourly and TS\_WINDOW = Next\_Increment



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The existence of an attribute value in this table does not imply the services must be offered by a Transmission Provider. Requirements as to which services must be offered are defined by regulation and tariffs. Likewise, absence of a service period value in Table 2-1 does not restrict a Transmission Provider from offering a service. The intent of the table is to establish common terminology associated with standard products.

Each service period value assumes a single time zone specified by the Transmission Provider. It is recognized that daylight time switches must be accommodated in practice, but they have been omitted here for the purpose of simplicity.

**Standard 2.1:** A Transmission Provider shall use the values and definitions below for the service period attributes, SERVICE\_INCREMENT AND TS\_WINDOW for all transmission services offered on OASIS, or shall post alternative service period values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use existing attribute values and definitions posted by other Transmission Providers. (See Standard 3 for registration requirements.)

**Standard 2.1.1:** FIXED HOURLY - The service starts at the beginning of a clock hour and stops at the end of a clock hour.

**Standard 2.1.2:** FIXED DAILY - The service starts at 00:00 and stops at 24:00 of the same calendar date (same as 00:00 of the next consecutive calendar date).

**Standard 2.1.3:** FIXED WEEKLY - The service starts at 00:00 on Monday and stops at 24:00 of the following Sunday (same as 00:00 of the following Monday).

**Standard 2.1.4:** FIXED MONTHLY - The service starts at 00:00 on the first date of a calendar month and stops at 24:00 on the last date of the same calendar month (same as 00:00 of the first date of the next consecutive month).

**Standard 2.1.5:** FIXED YEARLY - The service starts at 00:00 on the first date of a calendar year and ends at 24:00 on the last date of the same calendar year (same as 00:00 of the first date of the next consecutive year).

**Standard 2.1.6:** SLIDING DAILY - The service starts at the beginning of any hour of the day and stops exactly 24 hours later at the same time on the next day.

**Standard 2.1.7:** SLIDING WEEKLY - The service starts at 00:00 of any date and stops exactly 168 hours later at 00:00 on the same day of the next week.

**Standard 2.1.8:** SLIDING MONTHLY - The service starts at 00:00 of any date and stops at 00:00 on the same date of the next month (28-31 days later). If there is no corresponding date in the following month, the service stops at 24:00 on the last day of the next month.

For example: SLIDING MONTHLY starting at 00:00 on January 30 would stop at 24:00 on February 28 (same as 00:00 March 1).



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**Standard 2.1.9:** SLIDING YEARLY - The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year.

For example SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year.

**Standard 2.1.10:** EXTENDED DAILY - The service starts at any hour of a day and stops more than 24 hours later and less than 168 hours later.

**Standard 2.1.11:** EXTENDED WEEKLY - The service starts at 00:00 of any date and stops at 00:00 more than one week later, but less than four weeks later.

**Standard 2.1.12:** EXTENDED MONTHLY - The service starts at 00:00 of any date and stops at 00:00 more than one month later, but less than twelve months later.

**Standard 2.1.13:** EXTENDED YEARLY - The service starts at 00:00 of any date and stops at 00:00 more than one year later, but must be requested in increments of full years.

**Standard 2.1.14:** NEXT\_INCREMENT HOURLY - The service starts at the beginning of the next clock hour and stops at the end of that clock hour.

#### **Attribute Values Defining Service Class**

**Standard 2.2:** A Transmission Provider shall use the values and definitions below to describe the service class, TS\_CLASS, for transmission services offered on OASIS, or shall post alternative TS\_CLASS attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use the attribute values and definitions posted by other Transmission Providers. (See Standard 3 for registration requirements.)

**Standard 2.2.1:** FIRM - Transmission service that always has priority over NONFIRM transmission service and includes Native Load Customers, Network Customers, and any transmission service not classified as non-firm in accordance with the definitions in the pro forma tariff.

**Standard 2.2.2:** NON-FIRM - Transmission service that is reserved and/or scheduled on an as-available basis and is subject to curtailment or interruption at a lesser priority compared to FIRM transmission service, including Native Load Customers and Network Customers, in accordance with the definitions in the pro forma tariff.

#### **Attribute Values Defining Service Types**

**Standard 2.3:** A Transmission Provider shall use the values and definitions below to describe the service type, TS\_TYPE, for transmission services offered on OASIS, or shall post alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>,





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or shall use the attribute values and definitions posted by other Transmission Providers. (See Standard 3 for registration requirements.)

**Standard 2.3.1:** POINT-TO-POINT (PTP) - Transmission service that is reserved and/or scheduled between specified POINTS OF RECEIPT and DELIVERY pursuant to Part II of the pro forma tariff and in accordance with the definitions in the pro forma tariff.

**Standard 2.3.2:** NETWORK - Network Integration Transmission Service that is provided to serve a Network Customer load pursuant to Part III of the pro forma tariff and in accordance with the definitions in the pro forma tariff.

### **Curtailement Priorities**

**Standard 2.4:** A Transmission Provider that has adopted NERC TLR Procedures shall use the curtailment priority definitions contained in those procedures for all transmission services offered on OASIS. A Transmission Provider that has adopted alternative curtailment procedures shall post its alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use attribute values and definitions posted by another Transmission Provider. (See Standard 3 for registration requirements.)

### **Other Service Attribute Values**

The Commission has defined six ancillary services in Order No. 888. Other services may be offered pursuant to filed tariffs.

**Standard 2.5:** A Transmission Provider shall use the definitions below to describe the AS\_TYPES offered on OASIS, or shall post alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use attribute values and definitions posted by another Transmission Provider. (See Standard 3 for registration requirements.)

### **FERC Ancillary Services Definitions**

**Standard 2.5.1:** SCHEDULING, SYSTEM CONTROL AND DISPATCH SERVICE (SC) - is necessary to the provision of basic transmission service within every control area. This service can be provided only by the operator of the control area in which the transmission facilities used are located. This is because the service is to schedule the movement of power through, out of, within, or into the control area. This service also includes the dispatch of generating resources to maintain generation/load balance and maintain security during the transaction and in accordance with Standard 3.1 (and Schedule 1) of the pro forma tariff.

**Standard 2.5.2:** REACTIVE SUPPLY AND VOLTAGE CONTROL FROM GENERATION SOURCES SERVICE (RV) - is the provision of reactive power and voltage control by generating facilities under the control of the control area operator. This service is necessary to the



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provision of basic transmission service within every control area and in accordance with Standard 3.2 (and Schedule 2) of the pro forma tariff.

**Standard 2.5.3:** REGULATION AND FREQUENCY RESPONSE SERVICE (RF) - is provided for transmission within or into the transmission provider's control area to serve load in the area. Customers may be able to satisfy the regulation service obligation by providing generation with automatic generation control capabilities to the control area in which the load resides and in accordance with Standard 3.3 (and Schedule 3) of the pro forma tariff.

**Standard 2.5.4:** ENERGY IMBALANCE SERVICE (I) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour and in accordance with Standard 3.4 (and Schedule 4) of the pro forma tariff.

**Standard 2.5.5:** OPERATING RESERVE - SPINNING RESERVE SERVICE (SP) - is provided by generating units that are on-line and loaded at less than maximum output. They are available to serve load immediately in an unexpected contingency, such as an unplanned outage of a generating unit and in accordance with Standard 3.5 (and Schedule 5) of the pro forma tariff.

**Standard 2.5.6:** OPERATING RESERVE - SUPPLEMENTAL RESERVE SERVICE (SU) - is generating capacity that can be used to respond to contingency situations. Supplemental reserve is not available instantaneously, but rather within a short period (usually ten minutes). It is provided by generating units that are on-line but unloaded, by quick-start generation, and by customer interrupted load and in accordance with Standard 3.6 (and Schedule 6) of the pro forma tariff.

**Other Service Definitions**

Other services may be offered to Transmission Customers through Commission-approved revisions to their individual open access tariffs. Examples of other services that may be offered include the Interconnected Operations Services described below in Standards 2.5.7, 2.5.8, and 2.5.9. Ancillary service definitions may be offered pursuant to an individual transmission provider's specific tariff filings.

**Standard 2.5.7:** DYNAMIC TRANSFER (DT) - is the provision of the real-time monitoring, telemetering, computer software, hardware, communications, engineering, and administration required to electronically move all or a portion of the real energy services associated with a generator or load out of its Host Control Area into a different Electronic Control Area.

**Standard 2.5.8:** REAL POWER TRANSMISSION LOSSES (TL) - is the provision of capacity and energy to replace energy losses associated with transmission service on the Transmission Provider's system.



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**Standard 2.5.9:** SYSTEM BLACK START CAPABILITY (BS) - is the provision of generating equipment that, following a system blackout, is able to start without an outside electrical supply. Furthermore, BLACK START CAPABILITY is capable of being synchronized to the transmission system such that it can provide a startup supply source for other system capacity that can then be likewise synchronized to the transmission system to supply load as part of a process of re-energizing the transmission system.

**Standard 2.6:** A Transmission Provider shall use the definitions below to describe the scheduling period leading up to the start time of a transaction:

**Standard 2.6.1:** SAME-DAY is after 2 p.m. of the preceding day and

**Standard 2.6.2:** NEXT-HOUR is one hour or less prior to the service start time.

**Standard 3.0 OASIS Registration Procedures**

**Entity Registration**

Operation of OASIS requires unambiguous identification of parties.

**Standard 3.1:** All entities or persons using OASIS shall register the identity of their organization (including DUNS number) or person at the OASIS Home Page at <http://www.tsin.com>. Registration identification shall include the parent entity (if any) of the registrant. Registration shall be a prerequisite to OASIS usage and renewed annually and whenever changes in identification occur and thereafter. An entity or person not complying with this requirement may be denied access by a transmission provider to that transmission provider's OASIS node.

The registration requirement applies to any entity logging onto OASIS for the purpose of using or updating information, including Transmission Providers, Transmission Customers, Observers, Control Areas, Security Coordinators, and Independent System Operators.

**Process to Register Non-Standard Service Attribute Values**

Standard 2 of the NAESB OASIS Business Practice Standards addresses the use of standard terminology in defining services on OASIS. These standard definitions for service attribute values will be posted publicly on the OASIS Home Page at <http://www.tsin.com> and may be used by all Transmission Providers to offer transmission and ancillary services on OASIS. If the Transmission Provider determines that the standard definitions are not applicable, the Transmission Provider may register new attribute values and definitions on the OASIS Home Page. Any Transmission Provider may use the attribute values and definitions posted by another Transmission Provider.

**Standard 3.2:** Providers of transmission and ancillary services shall use only attribute values and definitions that have been registered on the OASIS Home Page at <http://www.tsin.com> for all transmission and ancillary services offered on their OASIS.



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**Standard 3.3:** Providers of transmission and ancillary services shall endeavor to use on their OASIS nodes attribute values and definitions that have been posted by other Transmission Providers on the OASIS Home Page at <http://www.tsin.com> whenever possible.

**Registration of Points of Receipt and Delivery**

In order to improve coordination of path naming and to enhance the identification of commercially available connection points between Transmission Providers and regions, the business practice for Phase IA OASIS requires that:

- I. Transmission Providers register at the OASIS Home Page at <http://www.tsin.com>, all service points (Points of Receipt and Delivery) for which transmission service is available over the OASIS.
- II. Each Transmission Provider would then indicate on its OASIS node, for each Path posted on its OASIS node, the Points of Receipt and Delivery to which each Path is connected.

A Transmission Provider is not required to register specific generating stations as Points of Receipt, unless they were available as service points for the purposes of reserving transmission service on OASIS. The requirement also does not include registration of regional flowgates, unless they are service points for the purposes of reserving transmission on OASIS.

**Standard 3.4:** A Transmission Provider shall register and thereafter maintain on the OASIS Home Page at <http://www.tsin.com> all Points of Receipt and Delivery to and from which a Transmission Customer may reserve and schedule transmission service.

**Standard 3.5:** For each reservable Path posted on their OASIS nodes, Transmission Providers shall indicate the available Point(s) of Receipt and Delivery for that Path. These Points of Receipt and Delivery shall be from the list registered on the OASIS Home Page at <http://www.tsin.com>.

**Standard 3.6:** When two or more Transmission Providers share common Points of Receipt or Delivery, or when a Path connects Points of Receipt and Delivery in neighboring systems, the Transmission Providers owning and/or operating those facilities shall apply consistent names for those connecting paths or common paths on the OASIS.

**Standard 4.0 On-line Negotiation and Confirmation Process**

**Standard 4.1:** Consistent with FERC policy and regulations, all reservations and price negotiations shall be conducted on OASIS.

**Phase IA Negotiation Process State Transition Diagram**

The most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems provides a process state diagram to define the Customer and Transmission Provider interactions for negotiating transmission service. This



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diagram defines allowable steps in the reservation request, negotiation, approval and confirmation.

Standard 4.2 RESERVED

Standard 4.3 RESERVED

**Standard 4.4:** The state diagram appearing in Exhibit 4-1 in Section 4.2.10.2 of the most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems constitutes a recommended business practice in OASIS Phase IA.

**Standard 4.5:** The definitions in Section 4.2.10.2 of the most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems (status values) shall be applied to the process states in OASIS Phase IA.

**Negotiations Without Competing Bids**

The following practices are defined in order to enhance consistency of the reservation process across OASIS Phase IA nodes.

**Standard 4.6:** A Transmission Provider/Seller shall respond to a Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-2 Reservation Timing Requirements**. The time limit is measured from the time the request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

- I. INVALID
- II. DECLINED
- III. REFUSED
- IV. COUNTEROFFER
- V. ACCEPTED
- VI. STUDY (when the tariff allows), leading to REFUSED, COUNTEROFFER, or ACCEPTED.

**Standard 4.7:** Prior to setting a request to ACCEPTED, COUNTEROFFER, or REFUSED a Transmission Provider shall evaluate the appropriate resources and ascertain that the requested transfer capability is (or is not) available.

**Standard 4.8:** For any request that is REFUSED or INVALID, the Transmission Provider must indicate in the SELLER\_COMMENTS field the reason the request was refused or invalid.

**Standard 4.9:** The Customer may change a request from QUEUED, RECEIVED, STUDY, COUNTEROFFER, REBID, or ACCEPTED to WITHDRAWN at any time prior to CONFIRMED.

**Standard 4.10:** From ACCEPTED or COUNTEROFFER, a Customer may change the status to CONFIRMED or WITHDRAWN. In addition, a Customer may change the status from COUNTEROFFER to REBID. The Customer has the amount of time designated as Customer Confirmation Time Limit in **Table 4-2 Reservation Timing Requirements** to change the state



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of the request to CONFIRMED. The Customer time limit is measured from the first time the request is moved to ACCEPTED or COUNTEROFFER, and is not reset with subsequent iterations of negotiation.

**Standard 4.11:** After expiration of the Customer Confirmation Time Limit, specified in **Table 4-2 Reservation Timing Requirements**, the Transmission Provider has a right to move the request to the RETRACTED state.

**Standard 4.12:** Should the Customer elect to respond to a Transmission Provider's COUNTEROFFER by moving a reservation request to REBID, the Transmission Provider shall respond by taking the request to a DECLINED, ACCEPTED, or COUNTEROFFER state within the Provider Counter Time Limit, specified in **Table 4-2 Reservation Timing Requirements**. The Transmission Provider response time is measured from the most recent REBID time.

**Standard 4.13:** The following timing requirements shall apply to all reservation requests:

**Table 4-2**  
**Reservation Timing Requirements**

<b>Class</b>	<b>Service Increment</b>	<b>Time QUEUED Prior to Start</b>	<b>Provider Evaluation Time Limit<sup>1</sup></b>	<b>Customer Confirmation Limit<sup>2</sup> ACCEPTED or COUNTEROFFER<sup>3</sup></b>	<b>Provider Counter Time Limit after REBID<sup>4</sup></b>
Non-Firm	Hourly	<1 hour	Best effort	5 minutes	5 minutes
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes	10 minutes
Non-Firm	Daily	N/A	30 minutes	2 hours	10 minutes
Non-Firm	Weekly	N/A	4 hours	24 hours	4 hours
Non-Firm	Monthly	N/A	2 days <sup>5</sup>	24 hours	4 hours
Firm	Daily	< 24 hours	Best effort	2 hours	30 minutes
Firm	Daily	N/A	30 days <sup>6</sup>	24 hours	4 hours
Firm	Weekly	N/A	30 days <sup>6</sup>	48 hours	4 hours
Firm	Monthly	N/A	30 days <sup>6</sup>	4 days	4 hours
Firm	Yearly	60 days <sup>7</sup>	30 days	15 days	4 hours

**Notes for Table 4-2:**



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<sup>1</sup>Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.

<sup>2</sup>Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override pre-exemption deadlines.

<sup>3</sup>Measurement starts at the time the request is first moved to either ACCEPTED or COUNTEROFFER. The time limit does not reset on subsequent changes of state.

<sup>4</sup>Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.

<sup>5</sup>Days are defined as calendar days.

<sup>6</sup>Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers shall make best efforts to respond within 72 hours, or prior to the scheduling deadline, whichever is earlier, to a request for Daily Firm Service received during period 2-30 days ahead of the service start time.

<sup>7</sup>Subject to Section 17.1 of the pro forma tariff, whenever feasible and on a nondiscriminatory basis, transmission providers should accommodate requests made with less than 60 days notice.

**Negotiations with Competing Bids for Constrained Resources**

Competing bids exist when multiple requests cannot be accommodated due to a lack of available transmission capacity. One general rule is that OASIS requests should be evaluated and granted priority on a first-come-first-served basis established by OASIS QUEUED time. Thus, the first to request service should get it, all else being equal.

Exceptions to this first-come-first-served basis occur when there are competing requests for limited resources and the requests have different priorities established by FERC regulations and filed tariffs. Prior to the introduction of price negotiations, the attribute values that have served as a basis for determining priority include:

- I. Type (Network, Point-to-point)
- II. Class (Firm, Non-Firm)
- III. Increment (Hourly, Daily, Weekly, Monthly, Yearly)
- IV. Duration (the amount of time between the Start Date and the Stop Date)
- V. Amount (the MW amount)

Under a negotiation model, price can also be used as an attribute for determining priority. The negotiation process increases the possibility that a Transmission Provider will be evaluating multiple requests that cannot all be accommodated due to limited resources. In this scenario, it is possible that an unconfirmed request with an earlier QUEUED time could be preempted (SUPERSEDED). For this to occur, the subsequent request would be of higher priority or of greater price.

**Standard 4.14:** Consistent with regulations and filed tariffs, the following are recommended relative priorities of Service Request Tiers<sup>1</sup>. Specific exceptions may exist in accordance with

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<sup>1</sup>Note: The term Tier is introduced to avoid confusion with existing terms such as TS\_CLASS.



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filed tariffs. The priorities refer only to negotiation of service and do not refer to curtailment priority.

- 4.14.1. Service Request Tier 1: Native load, Network, or Long-term Firm
- 4.14.2. Service Request Tier 2: Short-term Firm
- 4.14.3. Service Request Tier 3: Network Service from Non-designated Resources
- 4.14.4. Service Request Tier 4: Non-firm
- 4.14.5. Service Request Tier 5: Non-firm Point-to-point Service over secondary receipt and delivery points
- 4.14.6. Service Request Tier 6: Non-firm Next Hour Market Service

**Standard 4.15:** Consistent with regulations and filed tariffs, reservation requests shall be handled in a first-come-first-served order based on QUEUE\_TIME.

**Standard 4.16:** Consistent with regulations and filed tariffs, Table 4-3 describes the relative priorities of competing service requests and rules for offering right-of-first-refusal. While the table indicates the relative priorities of two competing requests, it also is intended to be applied in the more general case of more than two competing requests.

**Table 4-3  
Priorities for Competing Reservation Requests**

<b>R O W</b>	<b>Request 1</b>	<b>Is Preempted by Request 2</b>	<b>Right of First Refusal</b>
1	Tier 1: Long-term Firm, Native Load, and Network Firm	N/A - Not preempted by a subsequent request.	N/A
2	Tier 2: Short-term Firm	Tier 1: Long-term Firm, Native Load, and Network Firm, while Request 1 is conditional. Once Request 1 is unconditional, it may not be preempted.	No
3	Tier 2: Short-term Firm	Tier 2: Short-term Firm of longer term (duration), while Request 1 is conditional. Once Request 1 is unconditional, it may not be preempted. <sup>1</sup>	Yes, while Request 1 is conditional. Once Request 1 is unconditional, it may not be preempted and right of first refusal is not applicable.
4	Tier 3: Network Service From Non-Designated Resources	Tiers 1 and 2: All Firm (including Network).	No
5	Tier 4: All Non-Firm PTP	Tiers 1 and 2: All Firm (including Network).	No





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6	Tier 4: All Non-Firm PTP	Tier 3: Network Service from Non-Designated Resources.	No
7	Tier 4: All Non-Firm PTP	Tier 4: Non-firm PTP of a longer term (duration) <sup>1</sup> . Except in the last hour prior to start (See Standard 4.23).	Yes <sup>2</sup>
8	Tier 4: All Non-Firm PTP	Tier 4: Non-firm PTP of equal term (duration) <sup>1</sup> and higher price, when Request 1 is still unconfirmed and Request 2 is received pre-confirmed. A confirmed non-firm PTP may not be preempted for another non-firm request of equal duration. (See Standards 4.22 and 4.25.)	Yes <sup>3</sup>
9	Tier 5: Non-firm PTP Service over secondary receipt and delivery points.	Tier 5 can be preempted by Tiers 1 through 4.	No
10	Tier 6: Non-firm Next Hour Market Service	Tier 6 can be preempted by Tiers 1 through 5.	No

<sup>1</sup> Longer duration, in addition to being higher SERVICE\_INCREMENT (i.e., WEEKLY has priority over DAILY), also may mean more multiples of the same SERVICE\_INCREMENT (i.e., 3 days may have priority over 2 days). Multiple service increments must be at the same level of capacity.

<sup>2</sup> Right of first refusal when a subsequent request is received of a longer duration applies only if the first request is confirmed.

<sup>3</sup> Right of first refusal when a subsequent request is received of an equal duration and higher price applies only when the first request is unconfirmed and the subsequent request is received pre-confirmed (see Standards 4.22 and 4.26).

**Standard 4.17:** For a request or reservation that is Superseded or Displaced, the Transmission Provider must indicate the Assignment Reference Number of the competing request and the reason for denial of service in the SELLER\_COMMENTS field.

**Standard 4.18:** Given competing requests for a limited resource and a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from an ACCEPTED or COUNTEROFFER state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-3. These state changes require dynamic notification to the Customer if the Customer has requested dynamic notification on OASIS.



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**Standard 4.19:** In those cases where right-of-first-refusal is required to be offered, the Transmission Provider shall notify the Customer, through the use of a COUNTEROFFER, of the opportunity to match the subsequent offer.

**Standard 4.20:** A Customer who has been extended a right-of-first-refusal shall have a confirmation time limit equal to the lesser of (a) the Customer Confirmation Time Limit in Table 4-2 or (b) 24 hours.

**Standard 4.21:** A Transmission Provider shall apply all rights-of-first-refusal in a nondiscriminatory and open manner for all Customers.

**Standard 4.22:** Once a non-firm PTP request has been confirmed, it shall not be displaced by a subsequent non-firm PTP request of equal duration and higher price.

**Standard 4.23:** A confirmed, non-firm PTP reservation for the next hour shall not be displaced within one hour of the start of the reservation by a subsequent non-firm PTP reservation request of longer duration.

**Standard 4.24:** A Transmission Provider shall accept any reservation request submitted for an unconstrained Path if the Customer's bid price is equal to or greater than the Transmission Provider's posted offer price at the time the request was queued, even if later requests are submitted at a higher price. This standard applies even when the first request is still unconfirmed, unless the Customer Confirmation Time Limit has expired for the first request.

**Standard 4.25:** Once an offer to provide non-firm PTP transmission service at a given price is extended to a Customer by the Transmission Provider, and while this first request is still unconfirmed but within the Customer Confirmation Time Limit, the Transmission Provider shall not preempt or otherwise alter the status of that first request on receipt of a subsequent request of the same Tier and equal duration at a higher price, unless the subsequent request is submitted as pre-confirmed.

**Standard 4.26:** If during a negotiation of service (i.e., prior to Customer confirmation) a subsequent pre-confirmed request for service over the same limited resource of equal duration but higher price is received, the Transmission Provider must COUNTEROFFER the price of service on the prior COUNTEROFFER or ACCEPTED price to match the competing offer, in order to give the first Customer an opportunity to match the offer. This practice must be implemented in a non-discriminatory manner.

**Standard 4.27:** Whenever a request or reservation is set to the state of Invalid, Refused, Declined, Superseded, Retracted, Annulled, or Displaced, the Transmission Provider or Seller shall enter the reason for the action in the SELLER\_COMMENTS field.

## **Standard 5.0 Procurement of Ancillary and Other Services**

### **Introduction**

Phase IA OASIS data templates allow the coupling of ancillary service arrangements with the purchase of transmission service for the purpose of simplifying the overall process for



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Customers. Transmission Providers must indicate (consistent with filed tariffs), which services are MANDATORY (must be taken from the Primary Transmission Provider), REQUIRED (must be provided for but may be procured from alternative sources), or OPTIONAL (not required as a condition of transmission service).

The Transmission Customer should make known to the Transmission Provider at the time of the reservation request certain options related to arrangement of ancillary services. The Transmission Customer may indicate:

- a. I will take all the MANDATORY and REQUIRED ancillary services from the Primary Transmission Provider
- b. I will take REQUIRED ancillary services from Third Party Seller X
- c. I would like to purchase OPTIONAL services
- d. I will self provide ancillary services
- e. I will arrange for ancillary services in the future (prior to scheduling)

While these interactions are available in the most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems, there is a need to clarify the associated business practices. The standards in Section 5 apply to services defined in filed tariffs.

#### **Transmission Provider Requirements**

**Standard 5.1:** The Transmission Provider shall designate which ancillary services are MANDATORY, REQUIRED, or OPTIONAL for each offered transmission service or each transmission path to the extent these requirements can be determined in advance of the submittal of a reservation request on a specific Path by a Transmission Customer.

**Standard 5.2:** A Transmission Provider shall modify a Transmission Customer's service request to indicate the Transmission Provider as the SELLER of any ancillary service, which is MANDATORY, to be taken from the Transmission Provider.

**Standard 5.3:** For REQUIRED and OPTIONAL services, the Transmission Provider shall not select a SELLER of ancillary service without the Transmission Customer first selecting that SELLER.

**Standard 5.4:** A Transmission Provider may accept a Transmission Customer's request for an ancillary service, which is not MANDATORY or REQUIRED, but shall indicate to the Transmission Customer at the time of acceptance in SELLER\_COMMENTS that the service is not MANDATORY or REQUIRED.

#### **Transmission Customer Requirements**

**Standard 5.5:** The Transmission Customer shall indicate with the submittal of a transmission reservation request, the preferred options for provision of ancillary services, such as the desire to use an alternative resource. The Transmission Provider shall post itself as the default ancillary service provider, if a Transmission Customer fails to indicate a third party SELLER of ancillary services. However, the Transmission Customer may change this designation at a



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later date, so long as this change is made prior to the Transmission Provider's scheduling deadline.

**Standard 5.6:** A Transmission Customer may, but is not required to, indicate a third party SELLER of ancillary services, if these services are arranged by the Transmission Customer off the OASIS and if such arrangements are permitted by the Transmission Provider's tariff. The Transmission Provider shall post itself as the default ancillary service provider, if a Transmission Customer fails to indicate a third party SELLER of ancillary services. However, the Transmission Customer may change this designation at a later date, so long as this change is made prior to the Transmission Provider's scheduling deadline.

**Standard 6.0 Pathnaming Standards**

**Introduction**

The Data Element Dictionary of the OASIS most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems, defines a path name in terms of a 50-character alphanumeric string:

**RR/TPTP/PATHPATHPATH/OPTIONALFROM-OPTIONALTOTO/SPR**

RegionCode/TransmissionProviderCode/PathName/OptionalFrom-To(POR-POD)/Spare

This definition leaves it to the Transmission Providers to name the paths from their own perspective. The following standards provide an unambiguous convention for naming paths and will produce more consistent path names.

**Transmission Provider Requirements**

**Standard 6.1:** A transmission provider shall use the path naming convention defined in the S&CP Data Dictionary for the naming of all reservable paths posted on OASIS.

**Standard 6.2:** A transmission provider shall use the third field in the path name to indicate the sending and receiving control areas. The control areas shall be designated using standard NERC codes for the control areas, separated by a hyphen. For example, the first three fields of the path name will be:

**RR/TPTP/CAXX-CAYY/**

**Standard 6.3:** A transmission provider shall use the fourth field of the path name to indicate POR and POD separated by a hyphen. For example, a path with a specific POR/POD would be shown as:

**RR/TPTP/CAXX-CAYY/PORPORPORPOR-PODPODPODPOD/**

If the POR and POD are designated as control areas, then the fourth field may be left blank (as per the example in 9.2).



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**Standard 6.4:** A transmission provider may designate a sub-level for Points of Receipt and Delivery. For example, a customer reserves a path to POD AAAA. The ultimate load may be indeterminate at the time. Later, the customer schedules energy to flow to a particular load that may be designated by the transmission provider as a sub-level Point of Delivery. This option is necessary to ensure certain transmission providers are not precluded from using more specific service points by the inclusion of the POR/POD in the path name. All sub-level PORs and PODs must be registered as such on <http://www.tsin.com>.

**Standard 7.0 Next Hour Market Service**

**Introduction**

The standards in this section apply to the offering of Next Hour Market (NHM) Service only. The Commission has designated this service as voluntary for a transmission provider to offer. Therefore the standards apply to a transmission provider only if that provider offers NHM Service, in which case the standards become mandatory for that provider.

**Transmission Provider Requirements**

**Standard 7.1:** Use of NHM Service shall be limited to interchange transactions having a duration of one clock-hour and requested no earlier than 60 minutes prior to the start time of the transaction.

**Standard 7.2:** A transmission provider offering NHM Service shall allow an eligible transmission customer to request a NHM Service reservation electronically using protocols compliant with the most current version of the NERC ETAG Specifications.

**Standard 7.3:** A transmission provider offering NHM Service shall allow a transmission customer to request NHM Service for one or more path segments of a tag by designating: (a) 0-NX as the transmission product code under the OASIS block and (b) BUYATMARKET as the OASIS reservation identifier.

**Standard 7.4:** A transmission provider offering NHM Service shall consider the submittal of a tag designating that provider on one or more path segments using NHM Service to include a pre-confirmed request for the necessary transmission reservation and associated mandatory ancillary services for each designated path segment, for the hour indicated. No additional confirmation steps shall be required by the transmission customer for a NHM Service transmission reservation and associated ancillary services.

**Standard 7.5:** A transmission provider offering NHM Service shall consider setting the amount of the NHM Service reservation as:

- a. The amount of the Transmission Provider Product, if specified.
- b. In accordance with the Transmission Provider's tariff, the MW amount at the POR or POD for that Provider in the Loss Table, if Transmission Provider Product is not specified.
- c. The MW amount in the Energy Profile, if neither Transmission Provider Product amount nor Provider Loss Table amounts are specified.



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**Standard 7.6:** The OASIS queue time of a NHM Service request or reservation shall be the transmission provider ETAG approval service receipt time, unless a system failure requires the use of ETAG backup procedures, in which case the OASIS queue time shall be the time the tag is received by the transmission provider.

**Standard 7.7:** The 0-NX designation in the tag assigns as transmission customer, for all NHM Service path segments in the transaction, the PSE that is designated as the Purchasing-Selling Entity (PSE) responsible for the tag. A PSE submitting a tag may not designate a NHM Service reservation for another PSE and a transmission provider may not assign a reservation to any transmission customer other than the PSE submitting the NHM Service tag.

**Standard 7.8:** When evaluating competing requests for transmission reservations, a transmission provider offering NHM Service shall consider the NHM Service to have a priority lower than Tier 5 – point-to-point service over secondary receipt and delivery points.

**Standard 7.9:** Once a tag becomes implemented in ETAG, the transmission provider shall consider the associated NHM Service reservations to be confirmed. Since the NHM Service confirmed reservation(s) are by definition less than one hour prior to start, these reservations shall not be displaced by a subsequent non-firm reservation of higher priority.

**Standard 7.10:** The transmission customer shall be obligated to pay for the transmission service under the terms of the tariff at the posted offer price for non-firm hourly service, once the interchange transaction tag becomes implemented in ETAG. In the event of a voluntary withdrawal or reduction in the amount or duration of the service by the transmission customer after the tag becomes implemented, the transmission customer shall remain obligated to pay for the full amount of the approved request. In the event of an involuntary curtailment or reduction of the service, initiated by the transmission provider or any other transmission provider, the transmission customer shall not be obligated to pay for any portions of the NHM Service that were involuntarily curtailed. In the case of involuntary curtailment or reduction, payment shall be based on a calculation of the MWhours actually used.

**Standard 7.11:** In the case that a transaction uses NHM Service for all required path segments in the tag, the default condition of the tag is NOT approved unless all required transmission providers and control areas indicate tag approval.

**Standard 7.12:** In the case that a transaction mixes one or more transaction path segments that use NHM Service with one or more path segments that use other types of transmission service, then 1) as long as the NHM Service path segment(s) are not fully approved, then the tag shall default to NOT approved; and 2) if all NHM Service path segments in the ETAG are fully approved, then the tag shall revert to the normal default status as specified in NERC and/or NAESB Standards.

**Standard 7.13:** The transmission customer shall be required to submit a NHM Service transaction request prior to the tag submittal time limit as specified in NERC and/or NAESB Standards, and no earlier than 60 minutes prior to the start of the transaction.



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**Standard 7.14:** The approval mechanism for a NHM Service reservation shall be the tag approval. If the tag is approved and has become implemented, all required NHM Service transmission reservations associated with that tag shall be considered confirmed reservations. If one or more transmission providers do NOT approve their segment(s) of the transaction, then the transaction shall be considered NOT approved. Each transmission provider designated in a tag that does not approve that segment of the tag shall indicate that the associated reservation for that segment is REFUSED. If a designated transmission provider in a NHM Service path segment approves the tag but the tag is not approved through the action or inaction of another transmission provider, then that transmission provider shall indicate that reservation is ANNULLED.

**Standard 7.15:** The transmission provider shall assign the reservation request and final disposition status on behalf of the transmission customer within one hour of the requested start of the NHM Service transaction, regardless of the ultimate disposition of the tag.

**Standard 7.16:** NHM Service shall have the lowest curtailment priority in the event that a curtailment or reduction of transfers is initiated. Specifically, NHM Service (0-NX) shall have a NERC Curtailment Priority of 0.

#### **4. SUPPORTING DOCUMENTATION**

- a. Description of Request:**
- b. Description of Recommendation:**
- c. Business Purpose:**
- d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

The intent of the original OASIS Baseline Standards recommendation was to adopt, verbatim, the most recent versions of the OASIS Business Practices contained in the federal "regs" as well as the Standards and communications protocols or OASIS. As a matter of maintaining those business practices, the Electronic Scheduling Subcommittee noticed several issues that needed attention. In addition to general formatting issues, it was noted that the original recommendation did not utilize the latest version of the regulatory text. It was also noted that many external references existed and that several of the items listed as "standards" were either no longer applicable or were really better classified as explanatory or introductory text as opposed to standards requirements. As such, an effort was made – resulting in this recommendation – to clean up as much of these deficiencies as possible. Section 3 above summarizes those changes and they are provided as a redline to the original business practices in Attachment A below.



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**ATTACHMENT A. REDLINE OF MODIFICATIONS TO ORIGINALLY RATIFIED OASIS BUSINESS PRACTICES**

**Standard 1: Provision of Open Access Transmission Service. All transmission providers shall provide open access transmission service in accordance with the following requirements.**

Applicability

Standard 1 applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce and to transactions performed under the pro forma tariff required under currently applicable regulations.

Purpose

(a) The purpose of Standard 1 is to ensure that potential customers of open access transmission service receive access to information that will enable them to obtain transmission service on a non-discriminatory basis from any Transmission Provider. These rules provide standards of conduct and require the Transmission Provider (or its agent) to create and operate an Open Access Same-time Information System (OASIS) that gives all users of the open access transmission system access to the same information.

(b) The OASIS will provide information by electronic means about available transmission capability for point-to-point service and will provide a process for requesting transmission service. OASIS will enable Transmission Providers and Transmission Customers to communicate promptly requests and responses to buy and sell available transmission capacity offered under the Transmission Provider's tariff.

**Standard 1.1: RESERVED**

**Standard 1.2: RESERVED**

**Standard 1.3: Definitions.**

(a) Transmission Provider means any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.

(b) Transmission Customer means any eligible customer (or its designated agent) that can or does execute a transmission service agreement or can or does receive transmission service.

(c) Responsible party means the Transmission Provider or an agent to whom the Transmission Provider has delegated the responsibility of meeting any of the requirements of this part.





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(d) Reseller means any Transmission Customer who offers to sell transmission capacity it has purchased.

(e) Wholesale merchant function means the sale for resale of electric energy in interstate commerce.

(f) Affiliate means:

(1) For any exempt wholesale generator, as defined under section 32(a) of the Public Utility Holding Company Act of 1935, as amended, the same as provided in section 214 of the Federal Power Act; and

(2) For any other entity, the term affiliate has the same meaning as given in Sec. 18 CFR 161.2(a) of this chapter.

(g) Commission shall mean the Federal Energy Regulatory Commission.

**Standard 1.4: Standards of conductReserved.**

A Transmission Provider must conduct its business to conform with the following standards:

(a) General rules.

(1) Except as provided in paragraph (a)(2) of this standard, the employees of the Transmission Provider engaged in transmission system operations must function independently of its employees, or the employees of any of its affiliates, who engage in Wholesale Merchant Functions.

(2) Notwithstanding any other provisions in this section, in emergency circumstances affecting system reliability, Transmission Providers may take whatever steps are necessary to keep the system in operation. Transmission Providers must report to the Commission and on the OASIS each emergency that resulted in any deviation from the standards of conduct, within 24 hours of such deviation.

(b) Rules governing employee conduct.

(1) Prohibitions. Any employee of the Transmission Provider, or any employee of an affiliate, engaged in wholesale merchant functions is prohibited from:

(i) Conducting transmission system operations or reliability functions; and

(ii) Having access to the system control center or similar facilities used for transmission operations or reliability functions that differs in any way from the access available to other open access Transmission Customers.



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(2) Transfers. Employees engaged in either wholesale merchant functions or transmission system operations or reliability functions are not precluded from transferring between such functions as long as such transfer is not used as a means to circumvent the standards of conduct of this section. Notices of any employee transfer to or from transmission system operations or reliability functions must be posted on the OASIS as provided in Standard 1.6(g)(3).

The information to be posted must include: the name of the transferring employee, the respective titles held while performing each function (i.e., on behalf of the Transmission Provider and wholesale merchant or affiliate), and the effective date of the transfer. The information posted under this section must remain on the OASIS for 90 days.

(3) Information access. Any employee of the Transmission Provider, or of any of its affiliates, engaged in wholesale merchant functions:

(i) Shall have access to only that information available to the Transmission Provider's open access transmission customers (i.e., the information posted on an OASIS), and must not have preferential access to any information about the Transmission Provider's transmission system that is not available to all users of an OASIS; and

(ii) Is prohibited from obtaining information about the Transmission Provider's transmission system (including information about available transmission capability, price, curtailments, ancillary services, and the like) through access to information not posted on the OASIS that is not otherwise also available to the general public without restriction, or through information through the OASIS that is not also publicly available to all OASIS users.

(4) Disclosure. A Transmission Provider is responsible for ensuring compliance with the following provisions:

(i) Any employee of the Transmission Provider, or any employee of an affiliate, engaged in transmission system operations or reliability functions may not disclose to employees of the Transmission Provider, or any of its affiliates, engaged in wholesale merchant functions any information concerning the transmission system of the Transmission Provider or the transmission system of another (including information received from non affiliates or information about available transmission capability, price, curtailments, ancillary services, etc.) through non-public communications conducted off the OASIS, through access to information not posted on the OASIS that is not at the same time available to the general public without restriction, or through information on the OASIS that is not at the same time publicly available to all OASIS users (such as E-mail).



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~~(ii) If an employee of the Transmission Provider engaged in transmission system operations or reliability functions discloses information not posted on the OASIS in a manner contrary to the requirements of the standards of conduct, the Transmission Provider must immediately post such information on the OASIS.~~

~~(iii) A Transmission Provider may not share any market information, acquired from nonaffiliated Transmission Customers or potential nonaffiliated Transmission Customers, or developed in the course of responding to requests for transmission or ancillary service on the OASIS, with its own employees (or those of an affiliate) engaged in merchant functions, except to the limited extent information is required to be posted on the OASIS in response to a request for transmission service or ancillary services.~~

~~(5) Implementing tariffs.~~

~~(i) Employees of the Transmission Provider engaged in transmission system operations or reliability functions must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if these provisions do not provide for the use of discretion.~~

~~(ii) Employees of the Transmission Provider engaged in transmission system operations must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all customers (including the public utility and any affiliate) in a non-discriminatory manner, if these provisions involve discretion.~~

~~(iii) The Transmission Provider must keep a log, available for Commission audit, detailing the circumstances and manner in which it exercised its discretion under any terms of the tariff. The information contained in this log is to be posted on the OASIS as provided in Standard 1.6(g)(4).~~

~~(iv) The Transmission Provider may not, through its tariffs or otherwise, give preference to sales for resale by the wholesale merchant function or by any affiliate, over the interests of any other wholesale customer in matters relating to the sale or purchase of transmission service (including issues of price, curtailments, scheduling, priority, ancillary services, etc.).~~

~~(6) Books and records. A Transmission Provider must maintain its books of account and records as prescribed under currently applicable regulations separately from those of its affiliates and these must be available for Commission inspection.~~



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~~(c) Maintenance of written procedures. The Transmission Provider must maintain in a public place, and file with the Commission, current written procedures implementing the standards of conduct in such detail as will enable customers and the Commission to determine that the Transmission Provider is in compliance with the requirements of this section.~~

**Standard 1.5: Obligations of Transmission Providers and Responsible Parties.**

(a) Each Transmission Provider is required to provide for the operation of an OASIS, either individually or jointly with other Transmission Providers, in accordance with the requirements of these Standards. The Transmission Provider may delegate this responsibility to a Responsible Party such as another Transmission Provider, an Independent System Operator, a Regional Transmission Group, or a Regional Reliability Council.

(b) A Responsible Party must:

(1) Provide access to an OASIS providing standardized information relevant to the availability of transmission capacity, prices, and other information (as described in these Standards) pertaining to the transmission system for which it is responsible;

(2) Operate the OASIS in compliance with the standardized procedures and protocols found in the NAESB Standards and Communication Protocols for Open Access Same Time Information Systems; and

(3) Operate the OASIS in compliance with the Business Practice Standards for Open Access Same-time Information System (OASIS) Transactions set forth herein.

(c) A Responsible Party may not deny or restrict access to an OASIS user merely because that user makes automated computer-to-computer file transfers or queries, or extensive requests for data.

(d) In the event that an OASIS user's grossly inefficient method of accessing an OASIS node or obtaining information from the node seriously degrades the performance of the node, a Responsible Party may limit a user's access to the OASIS node without prior Commission approval. The Responsible Party must immediately contact the OASIS user to resolve the problem. Notification of the restriction must be made to the Commission within two business days of the incident and include a description of the problem. A closure report describing how the problem was resolved must be filed with the Commission within one week of the incident.

(e) In the event that an OASIS user makes an error in a query, the Responsible Party can block the affected query and notify the user of the nature of the error. The OASIS user must correct the error before making any additional queries. If there is a dispute



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over whether an error has occurred, the procedures in paragraph (d) of this section apply.

(f) Transmission Providers must provide "read only" access to the OASIS to Commission staff and the staffs of State regulatory authorities, at no cost, after such staff members have complied with the requisite registration procedures.

**Standard 1.6:** Information to be posted on the OASIS.

(a) The information posted on the OASIS must be in such detail and the OASIS must have such capabilities as to allow Transmission Customers to:

(1) Make requests for transmission services offered by Transmission Providers, Resellers and other providers of ancillary services;

(2) View and download in standard formats, using standard protocols, information regarding the transmission system necessary to enable prudent business decision making;

(3) Post, view, upload and download information regarding available products and desired services;

(4) Clearly identify the degree to which transmission service requests or schedules were denied or interrupted;

(5) Obtain access, in electronic format, to information to support available transmission capability calculations and historical transmission service requests and schedules for various audit purposes; and

(6) Make file transfers and automated computer-to-computer file transfers and queries as defined by the Standards and Communications Protocols Document.<sup>[jjd1]</sup>

(b) Posting transmission capability. The transmission capability that is expected to be available on the Transmission Provider's system (ATC) and the total transmission capability (TTC) of that system shall be calculated and posted for each Posted Path as set out in this section.

(1) Definitions. For purposes of this section the terms listed below have the following meanings:

(i) Posted path means any control area to control area interconnection; any path for which service is denied, curtailed or interrupted for more than 24 hours in the past 12 months; and any path for which a customer requests to have ATC or TTC posted. For this last category, the posting must continue for 180 days and thereafter until 180 days have



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elapsed from the most recent request for service over the requested path. For purposes of this definition, an hour includes any part of an hour during which service was denied, curtailed or interrupted.

(ii) Constrained posted path means any posted path having an ATC less than or equal to 25 percent of TTC at any time during the preceding 168 hours or for which ATC has been calculated to be less than or equal to 25 percent of TTC for any period during the current hour or the next 168 hours.

(iii) Unconstrained posted path means any posted path not determined to be a constrained posted path.

(iv) The word interconnection, as used in the definition of "posted path", means all facilities connecting two adjacent systems or control areas.

(2) Calculation methods, availability of information, and requests.

(i) Information used to calculate any posting of ATC and TTC must be dated and time-stamped and all calculations shall be performed according to consistently applied methodologies referenced in the Transmission Provider's transmission tariff and shall be based on current industry practices, standards and criteria.

(ii) On request, the Responsible Party must make all data used to calculate ATC and TTC for any constrained posted paths publicly available (including the limiting element(s) and the cause of the limit (e.g., thermal, voltage, stability)) in electronic form within one week of the posting. The information is required to be provided only in the electronic format in which it was created, along with any necessary decoding instructions, at a cost limited to the cost of reproducing the material. This information is to be retained for six months after the applicable posting period.

(iii) System planning studies or specific network impact studies performed for customers to determine network impacts are to be made publicly available in electronic form on request and a list of such studies shall be posted on the OASIS. A study is required to be provided only in the electronic format in which it was created, along with any necessary decoding instructions, at a cost limited to the cost of reproducing the material. These studies are to be retained for two years.

(3) Posting. The ATC and TTC for all Posted Paths must be posted in megawatts by specific direction and in the manner prescribed in this subsection.

(i) Constrained posted paths—



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(A) For Firm ATC and TTC.

(1) The posting shall show ATC and TTC for a 30-day period. For this period postings shall be: by the hour, for the current hour and the 168 hours next following; and thereafter, by the day. If the Transmission Provider charges separately for on-peak and off-peak periods in its tariff, ATC and TTC will be posted daily for each period.

(2) Postings shall also be made by the month, showing for the current month and the 12 months next following.

(3) If planning and specific requested transmission studies have been done, seasonal capability shall be posted for the year following the current year and for each year following to the end of the planning horizon but not to exceed 10 years.

(B) For Non-Firm ATC and TTC. The posting shall show ATC and TTC for a 30-day period by the hour and days prescribed under paragraph (b)(3)(i)(A)(1) of this standard and, if so requested, by the month and year as prescribed under paragraph (b)(3)(i)(A) (2) and (3) of this standard.

(C) Updating Posted Information for Constrained Paths.

(1) The capability posted under paragraphs (b)(3)(i) (A) and (B) of this standard must be updated when transactions are reserved or service ends or whenever the TTC estimate for the Path changes by more than 10 percent.

(2) All updating of hourly information shall be made on the hour.

(ii) Unconstrained posted paths.

(A) Postings of firm and nonfirm ATC and TTC shall be posted separately by the day, showing for the current day and the next six days following and thereafter, by the month for the 12 months next following. If the Transmission Provider charges separately for on-peak and off-peak periods in its tariff, ATC and TTC will be posted separately for the current day and the next six days following for each period. These postings are to be updated whenever the ATC changes by more than 20 percent of the Path's TTC.



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(B) If planning and specific requested transmission studies have been done, seasonal capability shall be posted for the year following the current year and for each year following until the end of the planning horizon but not to exceed 10 years.

(c) Posting Transmission Service Products and Prices.

(1) Transmission Providers must post prices and a summary of the terms and conditions associated with all transmission products offered to Transmission Customers.

(2) Transmission Providers must provide a downloadable file of their complete tariffs in the same electronic format as the tariff that is filed with the Commission.

(3) Any offer of a discount for any transmission service made by the Transmission Provider must be announced to all potential customers solely by posting on the OASIS.

(4) For any transaction for transmission service agreed to by the Transmission Provider and a customer, the Transmission Provider (at the time when ATC must be adjusted in response to the transaction), must post on the OASIS (and make available for download) information describing the transaction (including: price; quantity; points of receipt and delivery; length and type of service; identification of whether the transaction involves the Transmission Provider's wholesale merchant function or any affiliate; identification of what, if any, ancillary service transactions are associated with this transmission service transaction; and any other relevant terms and conditions) and shall keep such information posted on the OASIS for at least 30 days. A record of the transaction must be retained and kept available as part of the audit log required in Standard 1.7.

(5) Customers choosing to use the OASIS to offer for resale transmission capacity they have purchased must post relevant information to the same OASIS as used by the one from whom the Reseller purchased the transmission capacity. This information must be posted on the same display page, using the same tables, as similar capability being sold by the Transmission Provider, and the information must be contained in the same downloadable files as the Transmission Provider's own available capability. A customer reselling transmission capacity without the use of an OASIS must, nevertheless, inform the original Transmission Provider of the transaction within any time limits prescribed by the Transmission Provider's tariff or in a contract or service agreement between the Transmission Provider and a customer.

(d) Posting Ancillary Service Offerings and Prices.





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(1) Any ancillary service required to be provided or offered under the pro forma tariff required under currently applicable regulations must be posted with the price of that service.

(2) Any offer of a discount for any ancillary service made by the Transmission Provider must be announced to all potential customers solely by posting on the OASIS.

(3) For any transaction for ancillary service agreed to by the Transmission Provider and a customer, the Transmission Provider (at the time when ATC must be adjusted in response to an associated transmission service transaction, if any), must post on the OASIS (and make available for download) information describing the transaction (including: date and time when the agreement was entered into; price; quantity; length and type of service; identification of whether the transaction involves the Transmission Provider's wholesale merchant function or any affiliate; identification of what, if any, transmission service transactions are associated with this ancillary service transaction; and any other relevant terms and conditions) and shall keep such information posted on the OASIS for at least 30 days. A record of the transaction must be retained and kept available as part of the audit log required in Standard 1.7.

(4) Any other interconnected operations service offered by the Transmission Provider may be posted, with the price for that service.

(5) Any entity offering an ancillary service shall have the right to post the offering of that service on the OASIS if the service is one required to be offered by the Transmission Provider under their pro forma tariff. Any entity may also post any other interconnected operations service voluntarily offered by the Transmission Provider. Postings by customers and third parties must be on the same page, and in the same format, as postings of the Transmission Provider.

(e) Posting specific transmission and ancillary service requests and responses—

(1) General rules.

(i) All requests for transmission and ancillary service offered by Transmission Providers under the pro forma tariff, including requests for discounts, must be made on the OASIS, and posted prior to the Transmission Provider responding to the request, except as discussed in paragraphs (e)(1) (ii) and (iii). The Transmission Provider must post all requests for transmission service and for ancillary service comparably. Requests for transmission and ancillary service, and the responses to such requests, must be conducted in accordance with the Transmission Provider's tariff, and all currently applicable laws and regulations.

(ii) The requirement in paragraph (e)(1)(i) of this standard, to post requests for transmission and ancillary service offered by Transmission



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Providers under the pro forma tariff, including requests for discounts, prior to the Transmission Provider responding to the request, does not apply to requests for next-hour service made during Phase I.

(iii) In the event that a discount is being requested for ancillary services that are not in support of basic transmission service provided by the Transmission Provider, such request need not be posted on the OASIS.

(iv) In processing a request for transmission or ancillary service, the Responsible Party shall post the same information as required in Standard 1.6(c)(4), Standard 1.6(d)(3), and the following information: the date and time when the request is made, its place in any queue, the status of that request, and the result (accepted, denied, withdrawn).

(2) Posting when a request for transmission service is denied.

(i) When a request for service is denied, the Responsible Party must provide the reason for that denial as part of any response to the request.

(ii) Information to support the reason for the denial, including the operating status of relevant facilities, must be maintained for 60 days and provided, upon request, to the potential Transmission Customer.

(iii) Any offer to adjust operation of the Transmission Provider's System to accommodate the denied request must be posted and made available to all Transmission Customers at the same time.

(3) Posting when a transaction is curtailed or interrupted.

(i) When any transaction is curtailed or interrupted, the Transmission Provider must post notice of the curtailment or interruption on the OASIS, and the Transmission Provider must state on the OASIS the reason why the transaction could not be continued or completed.

(ii) Information to support any such curtailment or interruption, including the operating status of the facilities involved in the constraint or interruption, must be maintained and made available upon request, to the curtailed or interrupted customer, the Commission's Staff, and any other person who requests it, for three years.

(iii) Any offer to adjust the operation of the Transmission Provider's system to restore a curtailed or interrupted transaction must be posted and made available to all curtailed and interrupted Transmission Customers at the same time.

(f) Posting Transmission Service Schedules Information. Information on transmission service schedules must be recorded by the entity scheduling the transmission service



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and must be available on the OASIS for download. Transmission service schedules must be posted no later than seven calendar days from the start of the transmission service.

(g) Posting Other Transmission-Related Communications.

(1) The posting of other communications related to transmission services must be provided for by the Responsible Party. These communications may include "want ads" and "other communications" (such as using the OASIS as a Transmission-related conference space or to provide transmission-related messaging services between OASIS users). Such postings carry no obligation to respond on the part of any market participant.

(2) The Responsible Party is responsible for posting other transmission-related communications in conformance with the instructions provided by the third party on whose behalf the communication is posted. It is the responsibility of the third party requesting such a posting to ensure the accuracy of the information to be posted.

(3) Notices of transfers of personnel shall be posted as described in Standard 1.4(b)(2). The posting requirements are the same as those provided in Standard 1.7 for audit data postings.

(4) Logs detailing the circumstances and manner in which a Transmission Provider or Responsible Party exercised its discretion under any terms of the tariff shall be posted as described in Standard 1.4(b)(5)(iii). The posting requirements are the same as those provided in Standard 1.7 for audit data postings.

**Standard 1.7: Auditing Transmission Service Information.**

(a) All OASIS database transactions, except other transmission-related communications provided for under Standard 1.6(g)(2), must be stored, dated, and time stamped.

(b) Audit data must remain available for download on the OASIS for 90 days, except ATC/TTC postings that must remain available for download on the OASIS or 20 days. The audit data are to be retained and made available upon request for download for three years from the date when they are first posted in the same electronic form as used when they originally were posted on the OASIS.

**Standard 1.8: Obligations of OASIS users.**

Each OASIS user must notify the Responsible Party one month in advance of initiating a significant amount of automated queries. The OASIS user must also notify the Responsible Party one month in advance of expected significant increases in the volume of automated queries.



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**Section-Standard 2.0 Standard Terminology for Transmission and Ancillary Services**

**Section 2.1 Attribute Values Defining the Period of Service**

The data templates of the ~~Phase IA~~most current version of the NAESB Standards & Communication Protocols (S&CP) Document and Communications Protocol for Open Access Same-Time Information Systems have been developed with the use of standard service attributes in mind. What the ~~Phase IA S&CP Document~~most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems does not offer are specific definitions for each attribute value. This section offers standards for these ~~services~~services attribute definitions to be used in conjunction with the Phase IA data templates.

Fixed services are associated with transmission services whose periods align with calendar periods such as a day, week, or month. Sliding services are fixed in duration, such as a week or month, but the start and stop time may slide. For example a Sliding week could start on Tuesday and end on the following Monday. Extended allows for services in which the start time may slide and also the duration may be longer than a standard length. For example an Extended week of service could be nine consecutive days. Various transmission service offerings using these terms are defined in Standards 2.1.1 through 2.1.14 below. Next\_Increment indicates the next available full Service\_Increment, such as the next hour, next day, or next week. Next\_Increment is added at this time to address Next Hour Market Service, but may be used in the future to denote other products.

Table ~~12~~-1 identifies the standard terminology in OASIS Phase IA for the attributes SERVICE\_INCREMENT (Hourly, Daily, Weekly, Monthly, and Yearly) and TS\_WINDOW (Fixed, Sliding, Extended, and Next\_Increment). Values shown in Table ~~12~~-1 as N/A (Not Applicable) are not sufficiently common in the market to require standards.

Next Hour Market Service, a new pro forma service, is denoted as having a Service Increment of Hourly and a TS\_WINDOW of Next\_Increment.

**Table ~~12~~-1  
Standard Service Period Attribute Values in Phase IA**

	<b>Fixed</b>	<b>Sliding</b>	<b>Extended <sup>1</sup></b>	<b>Next Increment</b>
Hourly	X	N/A	N/A	X <sup>2</sup>
Daily	X	X	X	N/A
Weekly	X	X	X	N/A
Monthly	X	X	X	N/A
Yearly	X	X	X	N/A

<sup>1</sup>~~Included in the Phase IA S&CP Data Dictionary, Version 1.3, issued September 29, 1998.~~

<sup>2</sup>Included in the most current version of the Data Dictionary for the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems



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<sup>2</sup>Next Hour Market Service is identified by Service Increment = Hourly and TS\_WINDOW = Next\_Increment

The existence of an attribute value in this table does not imply the services must be offered by a Transmission Provider. Requirements as to which services must be offered are defined by regulation and tariffs. Likewise, absence of a service period value in Table 12-1 does not restrict a Transmission Provider from offering a service. The intent of the table is to establish common terminology associated with standard products.

Each service period value assumes a single time zone specified by the Transmission Provider. It is recognized that daylight time switches must be accommodated in practice, but they have been omitted here for the purpose of simplicity.

**Standard 2.1:** A Transmission Provider shall use the values and definitions below for the service period attributes, SERVICE\_INCREMENT AND TS\_WINDOW for all transmission services offered on OASIS, or shall post alternative service period values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use existing attribute values and definitions posted by other Transmission Providers. (See [Section Standard 3](#) for registration requirements.)

**Standard 2.1.1:** FIXED HOURLY - The service starts at the beginning of a clock hour and stops at the end of a clock hour.

**Standard 2.1.2:** FIXED DAILY - The service starts at 00:00 and stops at 24:00 of the same calendar date (same as 00:00 of the next consecutive calendar date).

**Standard 2.1.3:** FIXED WEEKLY - The service starts at 00:00 on Monday and stops at 24:00 of the following Sunday (same as 00:00 of the following Monday).

**Standard 2.1.4:** FIXED MONTHLY - The service starts at 00:00 on the first date of a calendar month and stops at 24:00 on the last date of the same calendar month (same as 00:00 of the first date of the next consecutive month).

**Standard 2.1.5:** FIXED YEARLY - The service starts at 00:00 on the first date of a calendar year and ends at 24:00 on the last date of the same calendar year (same as 00:00 of the first date of the next consecutive year).

**Standard 2.1.6:** SLIDING DAILY - The service starts at the beginning of any hour of the day and stops exactly 24 hours later at the same time on the next day.

**Standard 2.1.7:** SLIDING WEEKLY - The service starts at 00:00 of any date and stops exactly 168 hours later at 00:00 on the same day of the next week.

**Standard 2.1.8:** SLIDING MONTHLY - The service starts at 00:00 of any date and stops at 00:00 on the same date of the next month (28-31 days later). If there is no corresponding date in the following month, the service stops at 24:00 on the last day of the next month.



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For example: SLIDING MONTHLY starting at 00:00 on January 30 would stop at 24:00 on February 28 (same as 00:00 March 1).

**Standard 2.1.9:** SLIDING YEARLY - The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year.

For example SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year.

**Standard 2.1.10:** EXTENDED DAILY - The service starts at any hour of a day and stops more than 24 hours later and less than 168 hours later.

**Standard 2.1.11:** EXTENDED WEEKLY - The service starts at 00:00 of any date and stops at 00:00 more than one week later, but less than four weeks later.

**Standard 2.1.12:** EXTENDED MONTHLY - The service starts at 00:00 of any date and stops at 00:00 more than one month later, but less than twelve months later.

**Standard 2.1.13:** EXTENDED YEARLY - The service starts at 00:00 of any date and stops at 00:00 more than one year later, but must be requested in increments of full years.

**Standard 2.1.14:** NEXT\_INCREMENT HOURLY - The service starts at the beginning of the next clock hour and stops at the end of that clock hour.

**Section 2.2 Attribute Values Defining Service Class**

**Standard 2.2:** A Transmission Provider shall use the values and definitions below to describe the service class, TS\_CLASS, for transmission services offered on OASIS, or shall post alternative TS\_CLASS attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use the attribute values and definitions posted by other Transmission Providers. (See [Section Standard 3](#) for registration requirements.)

**Standard 2.2.1:** FIRM - Transmission service that always has priority over NONFIRM transmission service and includes Native Load Customers, Network Customers, and any transmission service not classified as non-firm in accordance with the definitions in the pro forma tariff.

**Standard 2.2.2:** NON-FIRM - Transmission service that is reserved and/or scheduled on an as-available basis and is subject to curtailment or interruption at a lesser priority compared to FIRM transmission service, including Native Load Customers and Network Customers, in accordance with the definitions in the pro forma tariff.

**Section 2.3 Attribute Values Defining Service Types**



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**Standard 2.3:** A Transmission Provider shall use the values and definitions below to describe the service type, TS\_TYPE, for transmission services offered on OASIS, or shall post alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use the attribute values and definitions posted by other Transmission Providers. (See [Section Standard 3](#) for registration requirements.)

**Standard 2.3.1:** POINT-TO-POINT (PTP) - Transmission service that is reserved and/or scheduled between specified POINTS OF RECEIPT and DELIVERY pursuant to Part II of the pro forma tariff and in accordance with the definitions in the pro forma tariff.

**Standard 2.3.2:** NETWORK - Network Integration Transmission Service that is provided to serve a Network Customer load pursuant to Part III of the pro forma tariff and in accordance with the definitions in the pro forma tariff.

#### **Section 2.4 Curtailment Priorities**

~~**Standard 2.4:** A Transmission Provider that has adopted NERC TLR Procedures shall use the curtailment priority definitions contained in NERC TLR Procedures for NERC CURTAILMENT PRIORITY (1-7) for all transmission services offered on OASIS. A Transmission Provider that has adopted alternative curtailment procedures shall post its alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use attribute values and definitions posted by another Transmission Provider. (See Section 3 for registration requirements.)~~

#### **Section 2.5 Other Service Attribute Values**

~~**Standard 2.4:** A Transmission Provider that has adopted NERC TLR Procedures shall use the curtailment priority definitions contained in those procedures [NERC TLR Procedures for NERC CURTAILMENT PRIORITY \(1-7\)](#) for all transmission services offered on OASIS. A Transmission Provider that has adopted alternative curtailment procedures shall post its alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use attribute values and definitions posted by another Transmission Provider. (See Standard 3 for registration requirements.)~~

#### **Other Service Attribute Values**

The Commission has defined six ancillary services in Order No. 888. Other services may be offered pursuant to filed tariffs.

**Standard 2.5:** A Transmission Provider shall use the definitions below to describe the AS\_TYPES offered on OASIS, or shall post alternative attribute values and associated definitions on the OASIS Home Page at <http://www.tsin.com>, or shall use attribute values and definitions posted by another Transmission Provider. (See [Section Standard 3](#) for registration requirements.)

#### **FERC Ancillary Services Definitions**



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**Standard 2.5.1:** SCHEDULING, SYSTEM CONTROL AND DISPATCH SERVICE (SC) - is necessary to the provision of basic transmission service within every control area. This service can be provided only by the operator of the control area in which the transmission facilities used are located. This is because the service is to schedule the movement of power through, out of, within, or into the control area. This service also includes the dispatch of generating resources to maintain generation/load balance and maintain security during the transaction and in accordance with ~~section~~Standard 3.1 (and Schedule 1) of the pro forma tariff.

~~**Standard 2.5.2:** REACTIVE SUPPLY AND VOLTAGE CONTROL FROM GENERATION SOURCES SERVICE (RV) - is the provision of reactive power and voltage control by generating facilities under the control of the control area operator. This service is necessary to the provision of basic transmission service within every control area and in accordance with section 3.2 (and Schedule 2) of the pro forma tariff.~~

~~**Standard 2.5.3:** REGULATION AND FREQUENCY RESPONSE SERVICE (RF) - is provided for transmission within or into the transmission provider's control area to serve load in the area. Customers may be able to satisfy the regulation service obligation by providing generation with automatic generation control capabilities to the control area in which the load resides and in accordance with section 3.3 (and Schedule 3) of the pro forma tariff.~~

~~**Standard 2.5.4:** ENERGY IMBALANCE SERVICE (I) - is the service for transmission within and into the transmission provider's control area~~ **Standard 2.5.2:** REACTIVE SUPPLY AND VOLTAGE CONTROL FROM GENERATION SOURCES SERVICE (RV) - is the provision of reactive power and voltage control by generating facilities under the control of the control area operator. This service is necessary to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour provision of basic transmission service within every control area and in accordance with ~~section~~Standard 3.42 (and Schedule 42) of the pro forma tariff.

~~**Standard 2.5.5:** OPERATING RESERVE - SPINNING RESERVE~~ **3:** REGULATION AND FREQUENCY RESPONSE SERVICE (SPRF) - is provided for transmission within or into the transmission provider's control area to serve load in the area. Customers may be able to satisfy the regulation service obligation by generating units that are on line and loaded at less than maximum output. They are available to serve load immediately in an unexpected contingency, such as an unplanned outage of a generating unit providing generation with automatic generation control capabilities to the control area in which the load resides and in accordance with ~~section 3.5~~Standard 3.3 (and Schedule 53) of the pro forma tariff.

~~**Standard 2.5.6:** OPERATING RESERVE - SUPPLEMENTAL RESERVE SERVICE (SU) - is generating capacity that can be used to respond~~ **Standard 2.5.4:** ENERGY IMBALANCE SERVICE (I) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to ~~contingency situations.~~





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~~Supplemental reserve, is not available instantaneously, but rather within a short period (usually ten minutes). It is provided by generating units that are on-line but unloaded, by quick-start generation, and by customer interrupted load load in the local control area over a single hour and in accordance with section Standard 3.64 (and Schedule 64) of the pro forma tariff.~~

~~**Other Service Definitions Standard 2.5.5:** OPERATING RESERVE - SPINNING RESERVE SERVICE (SP) - is provided by generating units that are on-line and loaded at less than maximum output. They are available to serve load immediately in an unexpected contingency, such as an unplanned outage of a generating unit and in accordance with Standard 3.5 (and Schedule 5) of the pro forma tariff.~~

~~**Standard 2.5.6:** OPERATING RESERVE - SUPPLEMENTAL RESERVE SERVICE (SU) - is generating capacity that can be used to respond to contingency situations. Supplemental reserve is not available instantaneously, but rather within a short period (usually ten minutes). It is provided by generating units that are on-line but unloaded, by quick-start generation, and by customer interrupted load and in accordance with Standard 3.6 (and Schedule 6) of the pro forma tariff.~~

**Other Service Definitions**

Other services may be offered to Transmission Customers through Commission-approved revisions to their individual open access tariffs. Examples of other services that may be offered include the Interconnected Operations Services described below in Standards 2.5.7, 2.5.8, and 2.5.9. Ancillary service definitions may be offered pursuant to an individual transmission provider's specific tariff filings.

**Standard 2.5.7:** DYNAMIC TRANSFER (DT) - is the provision of the real-time monitoring, telemetering, computer software, hardware, communications, engineering, and administration required to electronically move all or a portion of the real energy services associated with a generator or load out of its Host Control Area into a different Electronic Control Area.

**Standard 2.5.8:** REAL POWER TRANSMISSION LOSSES (TL) - is the provision of capacity and energy to replace energy losses associated with transmission service on the Transmission Provider's system.

**Standard 2.5.9:** SYSTEM BLACK START CAPABILITY (BS) - is the provision of generating equipment that, following a system blackout, is able to start without an outside electrical supply. Furthermore, BLACK START CAPABILITY is capable of being synchronized to the transmission system such that it can provide a startup supply source for other system capacity that can then be likewise synchronized to the transmission system to supply load as part of a process of re-energizing the transmission system.

**Standard 2.6:** A Transmission Provider shall use the definitions below to describe the scheduling period leading up to the start time of a transaction:

**Standard 2.6.1:** SAME-DAY is after 2 p.m. of the preceding day and



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**Standard 2.6.2:** NEXT-HOUR is one hour or less prior to the service start time.

**Section Standard 3.0 OASIS Registration Procedures**

**Section 3.1 Entity Registration**

**Entity Registration**

Operation of OASIS requires unambiguous identification of parties.

**Standard 3.1:** All entities or persons using OASIS shall register the identity of their organization (including DUNS number) or person at the OASIS Home Page at <http://www.tsin.com>. Registration identification shall include the parent entity (if any) of the registrant. Registration shall be a prerequisite to OASIS usage and renewed annually and whenever changes in identification occur and thereafter. An entity or person not complying with this requirement may be denied access by a transmission provider to that transmission provider's OASIS node.

The registration requirement applies to any entity logging onto OASIS for the purpose of using or updating information, including Transmission Providers, Transmission Customers, Observers, Control Areas, Security Coordinators, and Independent System Operators.

**Section 3.2 Process to Register Non-Standard Service Attribute Values**

**Section Standard 2** of the NAESB OASIS ~~business practice standards~~ Business Practice Standards addresses the use of standard terminology in defining services on OASIS. These standard definitions for service attribute values will be posted publicly on the OASIS Home Page at <http://www.tsin.com> and may be used by all Transmission Providers to offer transmission and ancillary services on OASIS. If the Transmission Provider determines that the standard definitions are not applicable, the Transmission Provider may register new attribute values and definitions on the OASIS Home Page. Any Transmission Provider may use the attribute values and definitions posted by another Transmission Provider.

**Standard 3.2:** Providers of transmission and ancillary services shall use only attribute values and definitions that have been registered on the OASIS Home Page at <http://www.tsin.com> for all transmission and ancillary services offered on their OASIS.

**Standard 3.3:** Providers of transmission and ancillary services shall endeavor to use on their OASIS nodes attribute values and definitions that have been posted by other Transmission Providers on the OASIS Home Page at <http://www.tsin.com> whenever possible.

**Section 3.3 Registration of Points of Receipt and Delivery**

In order to improve coordination of path naming and to enhance the identification of commercially available connection points between Transmission Providers and regions, the business practice for Phase IA OASIS requires that:



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- I. Transmission Providers register at the OASIS Home Page at <http://www.tsin.com>, all service points (Points of Receipt and Delivery) for which transmission service is available over the OASIS.
- II. Each Transmission Provider would then indicate on its OASIS node, for each Path posted on its OASIS node, the Points of Receipt and Delivery to which each Path is connected.

A Transmission Provider is not required to register specific generating stations as Points of Receipt, unless they were available as service points for the purposes of reserving transmission service on OASIS. The requirement also does not include registration of regional flowgates, unless they are service points for the purposes of reserving transmission on OASIS.

**Standard 3.4:** A Transmission Provider shall register and thereafter maintain on the OASIS Home Page at <http://www.tsin.com> all Points of Receipt and Delivery to and from which a Transmission Customer may reserve and schedule transmission service.

**Standard 3.5:** For each reservable Path posted on their OASIS nodes, Transmission Providers shall indicate the available Point(s) of Receipt and Delivery for that Path. These Points of Receipt and Delivery shall be from the list registered on the OASIS Home Page at <http://www.tsin.com>.

**Standard 3.6:** When two or more Transmission Providers share common Points of Receipt or Delivery, or when a Path connects Points of Receipt and Delivery in neighboring systems, the Transmission Providers owning and/or operating those facilities shall apply consistent names for those connecting paths or common paths on the OASIS.

**Section**

**Standard 4.0 On-line Negotiation and Confirmation Process**

**Section 4.1 On-line Price Negotiation in Short-term Markets**

**Standard 4.1:** Consistent with FERC policy and regulations, all reservations and price negotiations shall be conducted on OASIS.

**Phase IA Negotiation Process State Transition Diagram**

The most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems provides a process state diagram to define the Customer and Transmission Provider interactions for negotiating transmission service. This diagram defines allowable steps in the reservation request, negotiation, approval and confirmation.

Standard 4.2: ~~Reserved~~ RESERVED

Standard 4.3 RESERVED



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~~**Standard 4.3:**~~ **Reserved4:** The state diagram appearing in Exhibit 4-1 in Section 4.2.10.2 of the most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems constitutes a recommended business practice in OASIS Phase IA.

~~**Section 4.2 Phase IA Negotiation Process State Transition Diagram**~~

~~**Standard 4.5:** The definitions in Section 4.2.10.2 of the most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems (status values) shall be applied to the process states in OASIS Phase IA.~~

~~The Phase IA S&CP Document provides a process state diagram to define the Customer and Transmission Provider interactions for negotiating transmission service. This diagram defines allowable steps in the reservation request, negotiation, approval and confirmation.~~

~~**Standard 4.4:** The state diagram appearing in Exhibit 4-1 in Section 4.2.10.2 of the Version 1.3 of the S&CP Document constitutes a recommended business practice in OASIS Phase IA.~~

~~**Standard 4.5:** The definitions in Section 4.2.10.2 of the Version 1.3 of the S&CP Document (status values) shall be applied to the process states in OASIS Phase IA.~~

~~Table 4-1 Reserved~~

~~**Section 4.3 Negotiations Without Competing Bids**~~

The following practices are defined in order to enhance consistency of the reservation process across OASIS Phase IA nodes.

**Standard 4.6:** A Transmission Provider/Seller shall respond to a Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-22 Reservation Timing Requirements**. The time limit is measured from the time the request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

- I. INVALID
- II. DECLINED
- III. REFUSED
- IV. COUNTEROFFER
- V. ACCEPTED
- VI. STUDY (when the tariff allows), leading to REFUSED, COUNTEROFFER, or ACCEPTED.

**Standard 4.7:** Prior to setting a request to ACCEPTED, COUNTEROFFER, or REFUSED a Transmission Provider shall evaluate the appropriate resources and ascertain that the requested transfer capability is (or is not) available.



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**Standard 4.8:** For any request that is REFUSED or INVALID, the Transmission Provider must indicate in the SELLER\_COMMENTS field the reason the request was refused or invalid.

**Standard 4.9:** The Customer may change a request from QUEUED, RECEIVED, STUDY, COUNTEROFFER, REBID, or ACCEPTED to WITHDRAWN at any time prior to CONFIRMED.

**Standard 4.10:** From ACCEPTED or COUNTEROFFER, a Customer may change the status to CONFIRMED or WITHDRAWN. In addition, a Customer may change the status from COUNTEROFFER to REBID. The Customer has the amount of time designated as Customer Confirmation Time Limit in **Table 4-212 Reservation Timing Requirements** to change the state of the request to CONFIRMED. The Customer time limit is measured from the first time the request is moved to ACCEPTED or COUNTEROFFER, and is not reset with subsequent iterations of negotiation.

**Standard 4.11:** After expiration of the Customer Confirmation Time Limit, specified in **Table 4-212 Reservation Timing Requirements**, the Transmission Provider has a right to move the request to the RETRACTED state.

**Standard 4.12:** Should the Customer elect to respond to a Transmission Provider's COUNTEROFFER by moving a reservation request to REBID, the Transmission Provider shall respond by taking the request to a DECLINED, ACCEPTED, or COUNTEROFFER state within the Provider Counter Time Limit, specified in **Table 4-212 Reservation Timing Requirements**. The Transmission Provider response time is measured from the most recent REBID time.

**Standard 4.13:** The following timing requirements shall apply to all reservation requests:

**Table 4-212  
Reservation Timing Requirements**

Class	Service Increment	Time QUEUED Prior to Start	Provider Evaluation Time Limit <sup>1</sup>	Customer Confirmation Time Limit <sup>2</sup> ACCEPTED or COUNTEROFFER <sup>3</sup>	Provider Counter Time Limit after REBID <sup>4</sup>
Non-Firm	Hourly	<1 hour	Best effort	5 minutes	5 minutes
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes	10 minutes
Non-Firm	Daily	N/A	30 minutes	2 hours	10 minutes
Non-Firm	Weekly	N/A	4 hours	24 hours	4 hours
Non-Firm	Monthly	N/A	2 days <sup>5</sup>	24 hours	4 hours



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Firm	Daily	< 24 hours	Best effort	2 hours	30 minutes
Firm	Daily	N/A	30 days <sup>6</sup>	24 hours	4 hours
Firm	Weekly	N/A	30 days <sup>6</sup>	48 hours	4 hours
Firm	Monthly	N/A	30 days <sup>6</sup>	4 days	4 hours
Firm	Yearly	60 days <sup>7</sup>	30 days	15 days	4 hours

**Notes for Table 4-212:**

<sup>1</sup>Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.

<sup>2</sup>Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override pre-exemption deadlines.

<sup>3</sup>Measurement starts at the time the request is first moved to either ACCEPTED or COUNTEROFFER. The time limit does not reset on subsequent changes of state.

<sup>4</sup>Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.

<sup>5</sup>Days are defined as calendar days.

<sup>6</sup>Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers shall make best efforts to respond within 72 hours, or prior to the scheduling deadline, whichever is earlier, to a request for Daily Firm Service received during period 2-30 days ahead of the service start time.

<sup>7</sup>Subject to Section 17.1 of the pro forma tariff, whenever feasible and on a nondiscriminatory basis, transmission providers should accommodate requests made with less than 60 days notice.

**Section 4.4 Negotiations Withwith Competing Bids for Constrained Resources**

Competing bids exist when multiple requests cannot be accommodated due to a lack of available transmission capacity. One general rule is that OASIS requests should be evaluated and granted priority on a first-come-first-served basis established by OASIS QUEUED time. Thus, the first to request service should get it, all else being equal.

Exceptions to this first-come-first-served basis occur when there are competing requests for limited resources and the requests have different priorities established by FERC regulations and filed tariffs. Prior to the introduction of price negotiations, the attribute values that have served as a basis for determining priority include:

- I. Type (Network, Point-to-point)
- II. Class (Firm, Non-Firm)
- III. Increment (Hourly, Daily, Weekly, Monthly, Yearly)
- IV. Duration (the amount of time between the Start Date and the Stop Date)
- V. Amount (the MW amount)

Under a negotiation model, price can also be used as an attribute for determining priority. The negotiation process increases the possibility that a Transmission Provider will be evaluating



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multiple requests that cannot all be accommodated due to limited resources. In this scenario, it is possible that an unconfirmed request with an earlier QUEUED time could be preempted (SUPERSEDED). For this to occur, the subsequent request would be of higher priority or of greater price.

**Standard 4.14:** Consistent with regulations and filed tariffs, the following are recommended relative priorities of Service Request Tiers<sup>2</sup>. Specific exceptions may exist in accordance with filed tariffs. The priorities refer only to negotiation of service and do not refer to curtailment priority.

- 4.14.1. Service Request Tier 1: Native load, Network, or Long-term Firm
- 4.14.2. Service Request Tier 2: Short-term Firm
- 4.14.3. Service Request Tier 3: Network Service ~~From~~ Non-designated Resources
- 4.14.4. Service Request Tier 4: Non-firm
- 4.14.5. Service Request Tier 5: Non-firm Point-to-point Service over secondary receipt and delivery points
- 4.14.6. Service Request Tier 6: Non-firm Next Hour Market Service

**Standard 4.15:** Consistent with regulations and filed tariffs, reservation requests shall be handled in a first-come-first-served order based on QUEUE\_TIME.

**Standard 4.16:** Consistent with regulations and filed tariffs, Table [4-37-24-3](#) describes the relative priorities of competing service requests and rules for offering right-of-first-refusal. While the table indicates the relative priorities of two competing requests, it also is intended to be applied in the more general case of more than two competing requests.

**Table 4-3-23  
Priorities for Competing Reservation Requests**

<b>R O W</b>	<b>Request 1</b>	<b>Is Preempted by Request 2</b>	<b>Right of First Refusal</b>
1	Tier 1: Long-term Firm, Native Load, and Network Firm	N/A - Not preempted by a subsequent request.	N/A
2	Tier 2: Short-term Firm	Tier 1: Long-term Firm, Native Load, and Network Firm, while Request 1 is conditional. Once Request 1 is unconditional, it may not be preempted.	No

<sup>1</sup>Note: The term Tier is introduced to avoid confusion with existing terms such as TS\_CLASS.



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3	Tier 2: Short-term Firm	Tier 2: Short-term Firm of longer term (duration), while Request 1 is conditional. Once Request 1 is unconditional, it may not be preempted. <sup>1</sup>	Yes, while Request 1 is conditional. Once Request 1 is unconditional, it may not be preempted and right of first refusal is not applicable.
4	Tier 3: Network Service From Non-Designated Resources	Tiers 1 and 2: All Firm (including Network).	No
5	Tier 4: All Non-Firm PTP	Tiers 1 and 2: All Firm (including Network).	No
6	Tier 4: All Non-Firm PTP	Tier 3: Network Service from Non-Designated Resources.	No
7	Tier 4: All Non-Firm PTP	Tier 4: Non-firm PTP of a longer term (duration) <sup>1</sup> . Except in the last hour prior to start ( <b>See Standard 4.23</b> ).	Yes <sup>2</sup>
8	Tier 4: All Non-Firm PTP	Tier 4: Non-firm PTP of equal term (duration) <sup>1</sup> and higher price, when Request 1 is still unconfirmed and Request 2 is received pre-confirmed. A confirmed non-firm PTP may not be preempted for another non-firm request of equal duration. ( <b>See Standards 4.22 and 4.25.</b> )	Yes <sup>3</sup>
9	Tier 5: Non-firm PTP Service over secondary receipt and delivery points.	Tier 5 can be preempted by Tiers 1 through 4.	No
10	Tier 6: Non-firm Next Hour Market Service	Tier 6 can be preempted by Tiers 1 through 5.	No

<sup>1</sup> Longer duration, in addition to being higher SERVICE\_INCREMENT (*i.e.*, WEEKLY has priority over DAILY), also may mean more multiples of the same SERVICE\_INCREMENT (*i.e.*, 3 days may have priority over 2 days). Multiple service increments must be at the same level of capacity.

<sup>2</sup> Right of first refusal when a subsequent request is received of a longer duration applies only if the first request is confirmed.

<sup>3</sup> Right of first refusal when a subsequent request is received of an equal duration and higher price applies only when the first request is unconfirmed and the subsequent request is received pre-confirmed (see Standards **4.22 and 4.26**).





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**Standard 4.17:** For a request or reservation that is ~~—~~Superseded or Displaced, the Transmission Provider must indicate the Assignment Reference Number of the competing request and the reason for denial of service in the SELLER\_COMMENTS field.

**Standard 4.18:** Given competing requests for a limited resource and a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from an ACCEPTED or COUNTEROFFER state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-~~3-32~~. These state changes require dynamic notification to the Customer if the Customer has requested dynamic notification on OASIS.

**Standard 4.19:** In those cases where right-of-first-refusal is required to be offered, the Transmission Provider shall notify the Customer, through the use of a COUNTEROFFER, of the opportunity to match the subsequent offer.

**Standard 4.20:** A Customer who has been extended a right-of-first-refusal shall have a confirmation time limit equal to the lesser of (a) the Customer Confirmation Time Limit in Table ~~447-2~~ or (b) 24 hours.

**Standard 4.21:** A Transmission Provider shall apply all rights-of-first-refusal in a nondiscriminatory and open manner for all Customers.

**Standard 4.22:** Once a non-firm PTP request has been confirmed, it shall not be displaced by a subsequent non-firm PTP request of equal duration and higher price.

**Standard 4.23:** A confirmed, non-firm PTP reservation for the next hour shall not be displaced within one hour of the start of the reservation by a subsequent non-firm PTP reservation request of longer duration.

**Standard 4.24:** A Transmission Provider shall accept any reservation request submitted for an unconstrained Path if the Customer's bid price is equal to or greater than the Transmission Provider's posted offer price at the time the request was queued, even if later requests are submitted at a higher price. This standard applies even when the first request is still unconfirmed, unless the Customer Confirmation Time Limit has expired for the first request.

**Standard 4.25:** Once an offer to provide non-firm PTP transmission service at a given price is extended to a Customer by the Transmission Provider, and while this first request is still unconfirmed but within the Customer Confirmation Time Limit, the Transmission Provider shall not preempt or otherwise alter the status of that first request on receipt of a subsequent request of the same Tier and equal duration at a higher price, unless the subsequent request is submitted as pre-confirmed.

**Standard 4.26:** If during a negotiation of service (i.e., prior to Customer confirmation) a subsequent pre-confirmed request for service over the same limited resource of equal duration but higher price is received, the Transmission Provider must COUNTEROFFER the price of



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service on the prior COUNTEROFFER or ACCEPTED price to match the competing offer, in order to give the first Customer an opportunity to match the offer. This practice must be implemented in a non-discriminatory manner.

**Standard 4.27:** Whenever a request or reservation is set to the state of Invalid, Refused, Declined, Superseded, Retracted, Annulled, or Displaced, the Transmission Provider or Seller shall enter the reason for the action in the SELLER\_COMMENTS field.

**~~Section~~ Standard 5.0 Procurement of Ancillary and Other Services**

**~~Section 5.1~~ Introduction**

Phase IA OASIS data templates allow the coupling of ancillary service arrangements with the purchase of transmission service for the purpose of simplifying the overall process for Customers. Transmission Providers must indicate (consistent with filed tariffs), which services are MANDATORY (must be taken from the Primary Transmission Provider), REQUIRED (must be provided for but may be procured from alternative sources), or OPTIONAL (not required as a condition of transmission service).

The Transmission Customer should make known to the Transmission Provider at the time of the reservation request certain options related to arrangement of ancillary services. The Transmission Customer may indicate:

- a. I will take all the MANDATORY and REQUIRED ancillary services from the Primary Transmission Provider
- b. I will take REQUIRED ancillary services from Third Party Seller X
- c. I would like to purchase OPTIONAL services
- d. I will self provide ancillary services
- e. I will arrange for ancillary services in the future (prior to scheduling)

While these interactions are available in the ~~Phase IA S&CP Document~~ most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems, there is a need to clarify the associated business practices. The standards in Section 5 apply to services defined in filed tariffs.

**~~Section 5.2~~ Transmission Provider Requirements**

**Standard 5.1:** The Transmission Provider shall designate which ancillary services are MANDATORY, REQUIRED, or OPTIONAL for each offered transmission service or each transmission path to the extent these requirements can be determined in advance of the submittal of a reservation request on a specific Path by a Transmission Customer.

**Standard 5.2:** A Transmission Provider shall modify a Transmission Customer's service request to indicate the Transmission Provider as the SELLER of any ancillary service, which is MANDATORY, to be taken from the Transmission Provider.



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**Standard 5.3:** For REQUIRED and OPTIONAL services, the Transmission Provider shall not select a SELLER of ancillary service without the Transmission Customer first selecting that SELLER.

**Standard 5.4:** A Transmission Provider may accept a Transmission Customer's request for an ancillary service, which is not MANDATORY or REQUIRED, but shall indicate to the Transmission Customer at the time of acceptance in SELLER\_COMMENTS that the service is not MANDATORY or REQUIRED.

**~~Section 5.3~~ Transmission Customer Requirements**

**Standard 5.5:** The Transmission Customer shall indicate with the submittal of a transmission reservation request, the preferred options for provision of ancillary services, such as the desire to use an alternative resource. The Transmission Provider shall post itself as the default ancillary service provider, if a Transmission Customer fails to indicate a third party SELLER of ancillary services. However, the Transmission Customer may change this designation at a later date, so long as this change is made prior to the Transmission Provider's scheduling deadline.

**Standard 5.6:** A Transmission Customer may, but is not required to, indicate a third party SELLER of ancillary services, if these services are arranged by the Transmission Customer off the OASIS and if such arrangements are permitted by the Transmission Provider's tariff. The Transmission Provider shall post itself as the default ancillary service provider, if a Transmission Customer fails to indicate a third party SELLER of ancillary services. However, the Transmission Customer may change this designation at a later date, so long as this change is made prior to the Transmission Provider's scheduling deadline.

**~~Section Standard 6-.0~~ Pathnaming Standards**

**~~Section 6.1~~ Introduction**

The Data Element Dictionary of the OASIS ~~S&CP Document, Version 1.3~~ most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems, defines a path name in terms of a 50-character alphanumeric string:

**RR/TPTP/PATHPATHPATH/OPTIONALFROM-OPTIONALTOTO/SPR**

RegionCode/TransmissionProviderCode/PathName/OptionalFrom-To(POR-POD)/Spare

This definition leaves it to the Transmission Providers to name the paths from their own perspective. The following standards provide an unambiguous convention for naming paths and will produce more consistent path names.

**~~Section 6.2~~ Transmission Provider Requirements**

**Standard 6.1:** A transmission provider shall use the path naming convention defined in the S&CP Data Dictionary for the naming of all reservable paths posted on OASIS.



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**Standard 6.2:** A transmission provider shall use the third field in the path name to indicate the sending and receiving control areas. The control areas shall be designated using standard NERC codes for the control areas, separated by a hyphen. For example, the first three fields of the path name will be:

**RR/TPTP/CAXX-CAYY/**

**Standard 6.3:** A transmission provider shall use the fourth field of the path name to indicate POR and POD separated by a hyphen. For example, a path with a specific POR/POD would be shown as:

**RR/TPTP/CAXX-CAYY/PORPORPORPOR-PODPODPODPOD/**

If the POR and POD are designated as control areas, then the fourth field may be left blank (as per the example in [69.2](#)).

**Standard 6.4:** A transmission provider may designate a sub-level for Points of Receipt and Delivery. For example, a customer reserves a path to POD AAAA. The ultimate load may be indeterminate at the time. Later, the customer schedules energy to flow to a particular load that may be designated by the transmission provider as a sub-level Point of Delivery. This option is necessary to ensure certain transmission providers are not precluded from using more specific service points by the inclusion of the POR/POD in the path name. All sub-level PORs and PODs must be registered as such on <http://www.tsin.com>.

**~~Section~~ Standard 7--0 Next Hour Market Service**

**~~Section 7.1~~ Introduction**

The standards in this section apply to the offering of Next Hour Market (NHM) Service only. The Commission has designated this service as voluntary for a transmission provider to offer. Therefore the standards apply to a transmission provider only if that provider offers NHM Service, in which case the standards become mandatory for that provider.

**~~Section 7.2~~ Transmission Provider Requirements**

**Standard 7.1:** Use of NHM Service shall be limited to interchange transactions having a duration of one clock-hour and requested no earlier than 60 minutes prior to the start time of the transaction.

**Standard 7.2:** A transmission provider offering NHM Service shall allow an eligible transmission customer to request a NHM Service reservation electronically using protocols compliant with the [most current version of the](#) NERC ETAG Specifications [1-6](#).

**Standard 7.3:** A transmission provider offering NHM Service shall allow a transmission customer to request NHM Service for one or more path segments of a tag by designating: (a) 0-



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NX as the transmission product code under the OASIS block and (b) BUYATMARKET as the OASIS reservation identifier.

**Standard 7.4:** A transmission provider offering NHM Service shall consider the submittal of a tag designating that provider on one or more path segments using NHM Service to include a pre-confirmed request for the necessary transmission reservation and associated mandatory ancillary services for each designated path segment, for the hour indicated. No additional confirmation steps shall be required by the transmission customer for a NHM Service transmission reservation and associated ancillary services.

**Standard 7.5:** A transmission provider offering NHM Service shall consider set the amount of the NHM Service reservation as:

- a. The amount of the Transmission Provider Product, if specified.
- b. In accordance with the Transmission Provider's tariff, the MW amount at the POR or POD for that Provider in the Loss Table, if Transmission Provider Product is not specified.
- c. The MW amount in the Energy Profile, if neither Transmission Provider Product amount nor Provider Loss Table amounts are specified.

**Standard 7.6:** The OASIS queue time of a NHM Service request or reservation shall be the transmission provider ETAG approval service receipt time, unless a system failure requires the use of ETAG backup procedures, in which case the OASIS queue time shall be the time the tag is received by the transmission provider.

**Standard 7.7:** The 0-NX designation in the tag assigns as transmission customer, for all NHM Service path segments in the transaction, the PSE that is designated as the Purchasing-Selling Entity (PSE) responsible for the tag. A PSE submitting a tag may not designate a NHM Service reservation for another PSE and a transmission provider may not assign a reservation to any transmission customer other than the PSE submitting the NHM Service tag.

**Standard 7.8:** When evaluating competing requests for transmission reservations, a transmission provider offering NHM Service shall consider the NHM Service to have a priority lower than Tier 5 – point-to-point service over secondary receipt and delivery points.

**Standard 7.9:** Once a tag becomes implemented goes to IMPLEMENT or CONDITIONAL status in ETAG, the transmission provider shall consider the associated NHM Service reservations to be confirmed. Since the NHM Service confirmed reservation(s) are by definition less than one hour prior to start, these reservations shall not be displaced by a subsequent non-firm reservation of higher priority.

**Standard 7.10:** The transmission customer shall be obligated to pay for the transmission service under the terms of the tariff at the posted offer price for non-firm hourly service, once the interchange transaction tag becomes implemented is changed to the IMPLEMENT or CONDITIONAL status in ETAG. In the event of a voluntary withdrawal or reduction in the amount or duration of the service by the transmission customer after the tag becomes implemented has changed to IMPLEMENT or CONDITIONAL, the transmission customer shall



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remain obligated to pay for the full amount of the approved request. In the event of an involuntary curtailment or reduction of the service, initiated by the transmission provider or any other transmission provider, the transmission customer shall not be obligated to pay for any portions of the NHM Service that were involuntarily curtailed. In the case of involuntary curtailment or reduction, payment shall be based on a calculation of the MWhours actually used.

**Standard 7.11:** In the case that a transaction uses NHM Service for all required path segments in the tag, the default condition of the tag is NOT approved unless all required transmission providers and control areas indicate tag approval.

**Standard 7.12:** In the case that a transaction mixes one or more transaction path segments that use NHM Service with one or more path segments that use other types of transmission service, then 1) as long as the NHM Service path segment(s) are not fully approved, then the tag shall default to NOT approved; and 2) if all NHM Service path segments in the ETAG are fully approved, then the tag shall revert to the normal default status as specified in NERC [and/or NAESB Standards Operating Policy 3 and associated Appendices](#).

**Standard 7.13:** The transmission customer shall be required to submit a NHM Service transaction request prior to the tag submittal time limit as specified in NERC [and/or NAESB Standards Operating Policy 3 and associated Appendices](#), and no earlier than 60 minutes prior to the start of the transaction.

**Standard 7.14:** The approval mechanism for a NHM Service reservation shall be the tag approval. If the tag is approved and ~~has become implemented~~~~moved to the IMPLEMENT or CONDITIONAL state~~, all required NHM Service transmission reservations associated with that tag shall be considered confirmed reservations. If one or more transmission providers do NOT approve their segment(s) of the transaction, then the transaction shall be considered NOT approved. Each transmission provider designated in a tag that does not approve that segment of the tag shall indicate that the associated reservation for that segment is REFUSED. ~~If a designated transmission provider in a NHM Service path segment approves the tag but the tag is not approved through the action or inaction of another transmission provider, then that transmission provider shall indicate that reservation is ANNULLED.~~

**Standard 7.15:** The transmission provider shall assign the reservation request and final disposition status on behalf of the transmission customer within one hour of the requested start of the NHM Service transaction, regardless of the ultimate disposition of the tag.

**Standard 7.16:** NHM Service shall have the lowest curtailment priority in the event that a curtailment or reduction of transfers is initiated. Specifically, NHM Service (0-NX) shall have a NERC Curtailment Priority of 0.

~~**Standard 8.** A Responsible Party may not deny or restrict access to an OASIS user merely because that user makes automated computer to computer file transfers or queries, or extensive requests for data.~~



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~~**Standard 9.** In the event that an OASIS user's grossly inefficient method of accessing an OASIS node or obtaining information from the node seriously degrades the performance of the node, a Responsible Party may limit a user's access to the OASIS node without prior Commission approval. The Responsible Party must immediately contact the OASIS user to resolve the problem. Notification of the restriction must be made to the Commission within two business days of the incident and include a description of the problem. A closure report describing how the problem was resolved must be filed with the Commission within one week of the incident.~~

~~**Standard 10.** In the event that an OASIS user makes an error in a query, the Responsible Party can block the affected query and notify the user of the nature of the error. The OASIS user must correct the error before making any additional queries. If there is a dispute over whether an error has occurred, the procedures in the preceding paragraph apply.~~

~~**Standard 11.** Transmission Providers must provide "read only" access to the OASIS to Commission staff and to the staff of State regulatory authorities, at no cost, after such staff members have complied with the requisite registration procedures.~~

~~**Standard 12.** The information posted on the OASIS must be in such detail and the OASIS must have such capabilities as to allow Transmission Customers to:~~

~~(a) — Clearly identify the degree to which transmission service requests or schedules were denied or interrupted;~~

~~(b) — Obtain access, in electronic format, to information to support available transmission capability calculations and historical transmission service requests and schedules for various audit purposes; and~~

~~(c) — Make file transfers and automated computer to computer file transfers and queries as defined by the Standards and Communications Protocols Document.~~

~~**Standard 13.** Information to support any such curtailment or interruption, including the operating status of the facilities involved in the constraint or interruption, must be maintained and made available upon request, to the curtailed or interrupted customer, the Commission's Staff, and any other person who requests it, for three years.~~

~~**Standard 14.** Each OASIS user must notify the Responsible Party one month in advance of initiating a significant amount of automated queries. The OASIS user must also notify the Responsible Party one month in advance of expected significant increases in the volume of automated queries.~~



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**Standard 15. § 37.1 Applicability.**

~~———— This part applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce and to transactions performed under the pro forma tariff required in Part 35 of this Chapter. ———~~

**Standard 16. § 37.2 Purpose.**

~~———— (a) ——— The purpose of this part is to ensure that potential customers of open access transmission service receive access to information that will enable them to obtain transmission service on a non-discriminatory basis from any Transmission Provider. These rules provide standards of conduct and require the Transmission Provider (or its agent) to create and operate an Open Access Same-time Information System (OASIS) that gives all users of the open access transmission system access to the same information.~~

~~———— (b) ——— The OASIS will provide information by electronic means about available transmission capability for point to point service and will provide a process for requesting transmission service. OASIS will enable Transmission Providers and Transmission Customers to communicate promptly requests and responses to buy and sell available transmission capacity offered under the Transmission Provider's tariff.~~

**Standard 17. § 37.3 Definitions.**

~~———— (a) ——— Transmission Provider means any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.~~

~~———— (b) ——— Transmission Customer means any eligible customer (or its designated agent) that can or does execute a transmission service agreement or can or does receive transmission service.~~

~~———— (c) ——— Responsible Party means the Transmission Provider or an agent to whom the Transmission Provider has delegated the responsibility of meeting any of the requirements of this Part.~~

~~———— (d) ——— Reseller means any Transmission Customer who offers to sell transmission capacity it has purchased.~~

~~———— (e) ——— Wholesale Merchant Function means the sale for resale, or purchase for resale, of electric energy in interstate commerce.~~

~~———— (f) ——— Affiliate means:~~

~~(1) for any exempt wholesale generator, as defined under section 32(a) of the Public Utility Holding Company Act of 1935, as amended, the same as provided in section 214 of the Federal Power Act; and~~

~~(2) for any other entity, the term affiliate has the same meaning as given in § 161.2(a) of this Chapter.~~

**Standard 18. § 37.4 Standards of conduct.**

~~———— A Transmission Provider must conduct its business to conform with the following standards:~~

~~———— (a) General Rules~~

~~———— (1) Except as provided in paragraph (a)(2) of this section, the employees of the Transmission Provider engaged in transmission system operations must function independently of its employees, or the employees of any of its affiliates, who engage in Wholesale Merchant Functions.~~





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~~(2) Notwithstanding any other provisions in this section, in emergency circumstances affecting system reliability, Transmission Providers may take whatever steps are necessary to keep the system in operation. Transmission Providers must report to the Commission and on the OASIS each emergency that resulted in any deviation from the standards of conduct, within 24 hours of such deviation.~~

~~(b) Rules governing employee conduct~~

~~(1) Prohibitions. Any employee of the Transmission Provider, or any employee of an affiliate, engaged in wholesale merchant functions is prohibited from:~~

~~(i) conducting transmission system operations or reliability functions;  
and~~

~~(ii) having access to the system control center or similar facilities used for transmission operations or reliability functions that differs in any way from the access available to other open access Transmission Customers.~~

~~(2) Transfers. Employees engaged in either (i) wholesale merchant functions or (ii) transmission system operations or reliability functions are not precluded from transferring between such functions as long as such transfer is not used as a means to circumvent the standards of conduct of this section. Notices of any employee transfer to or from transmission system operations or reliability functions must be posted on the OASIS as provided in § 37.6 (g)(3). The information to be posted must include: the name of the transferring employee, the respective titles held while performing each function (i.e., on behalf of the Transmission Provider and wholesale merchant or affiliate), and the effective date of the transfer. The information posted under this section must remain on the OASIS for 90 days.~~

~~(3) Information Access. Any employee of the Transmission Provider, or of any of its affiliates, engaged in wholesale merchant functions:~~

~~(i) shall have access to only that information available to the Transmission Provider's open access transmission customers (i.e., the information posted on an OASIS), and must not have preferential access to any information about the Transmission Provider's transmission system that is not available to all users of an OASIS; and~~

~~(ii) is prohibited from obtaining information about the Transmission Provider's transmission system (including information about available transmission capability, price, curtailments, ancillary services, and the like) through access to information not posted on the OASIS that is not otherwise also available to the general public without restriction, or through information through the OASIS that is not also publicly available to all OASIS users.~~

~~(4) Disclosure. A Transmission Provider is responsible for ensuring compliance with the following provisions:~~

~~(i) Any employee of the Transmission Provider, or any employee of an affiliate, engaged in transmission system operations or reliability functions may not disclose to employees of the Transmission Provider, or any of its affiliates, engaged in wholesale merchant functions any information concerning the transmission system of the Transmission Provider or the transmission system of another (including information received from non-affiliates or information about available transmission capability, price, curtailments, ancillary services, etc.) through non-public communications conducted off the OASIS, through access to information not posted on the OASIS that is not at the same time available to the general public without restriction, or through information on the OASIS that is not at the same time publicly available to all OASIS users (such as E-mail).~~

~~(ii) If an employee of the Transmission Provider engaged in transmission system operations or reliability functions discloses information not posted on the OASIS in a~~



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~~manner contrary to the requirements of the standards of conduct, the Transmission Provider must immediately post such information on the OASIS.~~

~~(iii) A Transmission Provider may not share any market information, acquired from nonaffiliated Transmission Customers or potential nonaffiliated Transmission Customers, or developed in the course of responding to requests for transmission or ancillary service on the OASIS, with its own employees (or those of an affiliate) engaged in merchant functions, except to the limited extent information is required to be posted on the OASIS in response to a request for transmission service or ancillary services.~~

~~(5) Implementing Tariffs.~~

~~(i) Employees of the Transmission Provider engaged in transmission system operations or reliability functions must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if these provisions do not provide for the use of discretion.~~

~~(ii) Employees of the Transmission Provider engaged in transmission system operations must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all customers (including the public utility and any affiliate) in a non-discriminatory manner, if these provisions involve discretion.~~

~~(iii) The Transmission Provider must keep a log, available for Commission audit, detailing the circumstances and manner in which it exercised its discretion under any terms of the tariff.~~

~~(iv) The Transmission Provider may not, through its tariffs or otherwise, give preference to wholesale purchases or sales made on behalf of its own power customers, or those of an affiliate, over the interests of any other wholesale customer in matters relating to the sale or purchase of transmission service (including issues of price, curtailments, scheduling, priority, ancillary services, etc.).~~

~~(v) If the Transmission Provider offers a discount on purchases of transmission service made on behalf of its own power customers or those of any affiliate, then, at the same time, it must post on the OASIS an offer to provide the same discount to all Transmission Customers on the same path and on all unconstrained transmission paths.~~

~~(vi) If the Transmission Provider offers a rate discount on ancillary services to an affiliate, or attributes a discounted ancillary service rate to its own transactions, the Transmission Provider must, at the same time, post on the OASIS an offer to provide the same discount to all eligible customers.~~

~~(6) Books and Records. A Transmission Provider must maintain its books of account and records (as prescribed under Parts 101 and 125 of this Chapter) separately from those of its affiliates and these must be available for Commission inspection.~~

~~(c) Maintenance of written procedures. The Transmission Provider must maintain in a public place, and file with the Commission, current written procedures implementing the standards of conduct in such detail as will enable customers and the Commission to determine that the Transmission Provider is in compliance with the requirements of this section.~~

**Standard 19. § 37.5 Obligations of Transmission Providers and Responsible Parties.**

~~(a) Each Transmission Provider is required to provide for the operation of an OASIS, either individually or jointly with other Transmission Providers, in accordance with the requirements of this Part. The Transmission Provider may delegate this responsibility to a~~



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~~Responsible Party such as another Transmission Provider, an Independent System Operator, a Regional Transmission Group, or a Regional Reliability Council.~~

~~\_\_\_\_\_ (b) A Responsible Party must: (1) provide access to an OASIS providing standardized information relevant to the availability of transmission capacity, prices, and other information (as described in this Part) pertaining to the transmission system for which it is responsible; and~~

~~\_\_\_\_\_ (2) shall operate the OASIS in compliance with the standardized procedures and protocols found in OASIS Standards and Communication Protocols, which can be obtained from the Public Reference and Files Maintenance Branch, Room 2A, Federal Energy Regulatory Commission, 888 First Street NE, Washington, DC 20426.~~

~~\_\_\_\_\_ (c) Transmission Providers must provide "read only" access to the OASIS to Commission staff and the staffs of State regulatory authorities, at no cost, after such staff members have complied with the requisite registration procedures.~~

**Standard 20.** ~~§ 37.6 Information to be posted on an OASIS.~~

~~\_\_\_\_\_ (a) The information posted on the OASIS must be in such detail as to allow Transmission Customers to:~~

~~\_\_\_\_\_ (1) make requests for transmission services offered by Transmission Providers, Resellers and other providers of ancillary services;~~

~~\_\_\_\_\_ (2) view and download in standard formats, using standard protocols, information regarding the transmission system necessary to enable prudent business decision making;~~

~~\_\_\_\_\_ (3) post, view, upload and download information regarding available products and desired services;~~

~~\_\_\_\_\_ (4) clearly identify the degree to which their transmission service requests or schedules were denied or interrupted; and~~

~~\_\_\_\_\_ (5) obtain access, in electronic format, to information to support available transmission capability calculations and historical transmission service requests and schedules for various audit purposes.~~

~~\_\_\_\_\_ (b) Posting transmission capability. The transmission capability that is expected to be available on the Transmission Provider's system (ATC) and the total transmission capability (TTC) of that system shall be calculated and posted for each Posted Path as set out in this section.~~

~~\_\_\_\_\_ (1) Definitions. For purposes of this section,~~

~~\_\_\_\_\_ (i) Posted Path means any control area to control area interconnection; any path for which service is denied, curtailed or interrupted for more than 24 hours in the past 12 months; and any path for which a customer requests to have ATC or TTC posted. For this last category, the posting must continue for 180 days and thereafter until 180 days have elapsed from the most recent request for service over the requested path. For purposes of this definition, an hour includes any part of an hour during which service was denied, curtailed or interrupted.~~

~~\_\_\_\_\_ (ii) Constrained Posted Path means any posted path having an ATC less than or equal to 25 percent of TTC at any time during the preceding 168 hours or for which ATC has been calculated to be less than or equal to 25 percent of TTC for any period during the current hour or the next 168 hours.~~

~~\_\_\_\_\_ (iii) Unconstrained Posted Path means any posted path not determined to be a constrained posted path.~~



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~~(2) Calculation methods, availability of information, and requests.~~

~~(i) Information used to calculate any posting of ATC and TTC must be dated and time stamped and all calculations shall be performed according to consistently applied methodologies referenced in the Transmission Provider's transmission tariff and shall be based on current industry practices, standards and criteria.~~

~~(ii) On request, the Responsible Party must make all data used to calculate ATC and TTC for any constrained posted paths publicly available (including the limiting element(s) and the cause of the limit (e.g., thermal, voltage, stability)) in electronic form within one week of the posting. The information is required to be provided only in the electronic format in which it was created, along with any necessary decoding instructions, at a cost limited to the cost of reproducing the material. This information is to be retained for six months after the applicable posting period.~~

~~(iii) System planning studies or specific network impact studies performed for customers to determine network impacts are to be made publicly available in electronic form on request and a list of such studies shall be posted on the OASIS. A study is required to be provided only in the electronic format in which it was created, along with any necessary decoding instructions, at a cost limited to the cost of reproducing the material. These studies are to be retained for two years.~~

~~(3) Posting. The ATC and TTC for all Posted Paths must be posted in megawatts by specific direction and in the manner prescribed in this subsection.~~

~~(i) Constrained Posted Paths.~~

~~(A) For Firm ATC and TTC:~~

~~(1) The posting shall show ATC and TTC for a 30-day period. For this period postings shall be: by the hour, for the current hour and the 168 hours next following; and thereafter, by the day. If the Transmission Provider charges separately for on-peak and off-peak periods in its tariff, ATC and TTC will be posted daily for each period.~~

~~(2) Postings shall also be made by the month, showing for the current month and the 12 months next following.~~

~~(3) If planning and specific requested transmission studies have been done, seasonal capability shall be posted for the year following the current year and for each year following to the end of the planning horizon but not to exceed 10 years.~~

~~(B) For Non Firm ATC and TTC. The posting shall show ATC and TTC for a 30-day period by the hour and days prescribed under paragraph (b)(3)(i)(A)(1) of this section and, if so requested, by the month and year as prescribed under paragraph (b)(3)(i)(A)(2) and (3) of this section.~~

~~(C) Updating Posted Information for Constrained Paths. —~~

~~(1) The capability posted under paragraphs (b)(3)(i)(A) and (B) of this section must be updated when transactions are reserved or service ends or whenever the TTC estimate for the Path changes by more than 10 percent.~~

~~(2) All updating of hourly information shall be made on the hour.~~

~~(ii) Unconstrained Posted Paths.~~

~~(A) Postings of ATC and TTC shall be by the day, showing for the current day and the next six days following and thereafter, by the month for the 12 months next following. If the Transmission Provider charges separately for on-peak and off-peak periods in its tariff, ATC and TTC will be posted for the current day and the next six days~~



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: Southern Company Services**

**Request No.: R04005-A**

**Request Title: OASIS Baseline**

**Approved by the Executive Committee on 11/16/2004**

~~following for each period. These postings are to be updated whenever the ATC changes by more than 20 percent of the Path's TTC.~~

~~(B) If planning and specific requested transmission studies have been done, seasonal capability shall be posted for the year following the current year and for each year following until the end of the planning horizon but not to exceed 10 years.~~

~~(c) Posting Transmission Service Products and Prices.~~

~~(1) Transmission Providers must post prices and a summary of the terms and conditions associated with all transmission products offered to Transmission Customers.~~

~~(2) Transmission Providers must provide a downloadable file of their complete tariffs in the same electronic format as the tariff is filed with the Commission.~~

~~(3) A Transmission Provider, within 24 hours of agreeing to sell transmission service to a non affiliate at a discount (as measured from when ATC must be adjusted in response to the transaction), must post on the OASIS (and make available for download) information describing the transaction (including price, quantity, and any other relevant terms and conditions) and shall keep such information posted on the OASIS for at least 30 days. A record of the transaction must be retained and kept available as part of the audit log required in section 37.7. With respect to any discount offered to its own power customers or its affiliates, the Transmission Provider must, at the same time, post on the OASIS an offer to provide the same discount to all Transmission Customers on the same path and on all unconstrained transmission paths.~~

~~(4) Customers choosing to use the OASIS to offer for resale transmission capacity they have purchased must post relevant information to the same OASIS as used by the one from whom the Reseller purchased the transmission capacity. This information must be posted on the same display page, using the same tables, as similar capacity being sold by the Transmission Provider, and the information must be contained in the same downloadable files as the Transmission Provider's own available capability. A customer reselling transmission capacity without the use of an OASIS must, nevertheless, inform the original Transmission Provider of the transaction within the time limits prescribed by the "Sale or Assignment of Transmission Service" section of the pro forma tariff.~~

~~(d) Posting Ancillary Service Offerings and Prices.~~

~~(1) Any ancillary service required to be provided or offered under the pro forma tariff prescribed by Part 35 of this Chapter must be posted with the price of that service.~~

~~(2) A Transmission Provider, within 24 hours of agreeing to sell an ancillary service to a non affiliate at a discount, must post on the OASIS (and make available for download) information describing the transaction (including price, quantity, and any other relevant terms and conditions) and shall keep such information posted on the OASIS for at least 30 days. A record of the transaction must be retained and kept available as part of the audit log required in § 37.7. As to discounts for ancillary services, if a Transmission Provider offers a rate discount to an affiliate, or attributes a discounted ancillary service rate to its own transactions, the Transmission Provider must, at the same time, post on the OASIS an offer to provide the same discount to all eligible customers.~~

~~(3) Any other interconnected operations service offered by the Transmission Provider may be posted, with the price for that service.~~

~~(4) Any entity offering an ancillary service shall have the right to post the offering of that service on the OASIS if the service is one required to be offered by the Transmission Provider under the pro forma tariff prescribed by Part 35 of this Chapter. Any entity may also post any other interconnected operations service voluntarily offered by the~~



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~~Transmission Provider. Postings by customers and third parties must be on the same page, and in the same format, as postings of the Transmission Provider.~~

~~(e) Posting Specific Transmission Service Requests and Responses.~~

~~(1) General Rules.~~

~~(i) All requests for transmission service offered by Transmission Providers under the pro forma tariff must be made on the OASIS. Requests for transmission service, and the responses to such requests, must be conducted in accordance with the Transmission Provider's tariff, the Federal Power Act, and Commission regulations.~~

~~(ii) In processing a request for transmission or ancillary service, the Responsible Party shall post the following information: the date and time when the request is made, its place in any queue, the status of that request, and the result (accepted, denied, withdrawn).~~

~~(iii) The identity of the parties will be masked — if requested — during the negotiating period and for 30 days from the date when the request was accepted, denied or withdrawn.~~

~~(2) Posting when a request for transmission service is denied.~~

~~(i) When a request for service is denied, the Responsible Party must provide the reason for that denial as part of any response to the request.~~

~~(ii) Information to support the reason for the denial, including the operating status of relevant facilities, must be maintained for 60 days and provided, upon request, to the potential Transmission Customer.~~

~~(iii) Any offer to adjust operation of the Transmission Provider's System to accommodate the denied request must be posted and made available to all Transmission Customers at the same time.~~

~~(3) Posting when a transaction is curtailed or interrupted.~~

~~(i) When any transaction is curtailed or interrupted, the curtailment or interruption must be posted (with the identities of the parties masked as required in § 37.6(e)(1)(iii)) and must state the reason why the transaction could not be continued or completed.~~

~~(ii) Information to support any such curtailment or interruption, including the operating status of the facilities involved in the constraint or interruption, must be maintained for 60 days and provided, upon request, to the curtailed or interrupted customer.~~

~~(iii) Any offer to adjust the operation of the Transmission Provider's system to restore a curtailed or interrupted transaction must be posted and made available to all curtailed and interrupted Transmission Customers at the same time.~~

~~(f) Posting Transmission Service Schedules Information. Information on transmission service schedules must be recorded by the entity scheduling the transmission service and must be available on the OASIS for download. Transmission service schedules must be posted no later than seven calendar days from the start of the transmission service.~~

~~(g) Posting Other Transmission Related Communications.~~

~~(1) The posting of other communications related to transmission services must be provided for by the Responsible Party. These communications may include "want ads" and "other communications" (such as using the OASIS as a Transmission related conference space or to provide transmission related messaging services between OASIS users). Such postings carry no obligation to respond on the part of any market participant.~~



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~~(2) The Responsible Party is responsible for posting other transmission-related communications in conformance with the instructions provided by the third party on whose behalf the communication is posted. It is the responsibility of the third party requesting such a posting to ensure the accuracy of the information to be posted.~~

~~(3) Posting Transfers. Notices of transfers of personnel as described in § 37.4(b)(2) shall be posted.~~

**Standard 21. § 37.7 Auditing Transmission Service Information.**

~~(a) All OASIS database transactions, except other transmission related communications provided for under § 37.6(g)(2), must be stored, dated, and time stamped.~~

~~(b) Audit data must remain available for download on the OASIS for 90 days. The audit data are to be retained and made available upon request for three years from the date when they are first posted.~~

**Standard 22. § 37.8 Implementation schedule for OASIS requirements; phases.**

~~Each Transmission Provider must develop or participate in an OASIS that meets the requirements of this Part and that is in operation by November 1, 1996. Each Transmission Provider must be in compliance with the standards of conduct prescribed in § 37.4 by November 1, 1996.~~



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: NAESB Electronic Scheduling Subcommittee  
Request No.: R04006A  
Request Title: Modifications to OASIS Business Practices**

**Approved by the Executive Committee on November 16, 2004**

**1. RECOMMENDED ACTION:**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT  
RECOMMENDED ACTION:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
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- Code Value
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:**

Adopt a new standard to implement the Standards of Conduct requirements detailed in FERC Order 2004.

**RECOMMENDED STANDARDS:**

Standards of Conduct for Electric Transmission Providers

**1.0 Applicability**

(a) Reserved





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
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(b) This standard applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.

(c) This standard does not apply to a public utility Transmission Provider that is a Commission-approved Independent System Operator (ISO) or Regional Transmission Organization (RTO). If a public utility transmission owner participates in a Commission-approved ISO or RTO and does not operate or control its transmission facilities and has no access to transmission, customer or market information covered by Requirement 5.0(b), it may request an exemption from this standard.

(d) Transmission Provider may file a request for an exemption from all or some of the requirements of this part for good cause.

## **2.0 General principles**

(a) A Transmission Provider's employees engaged in transmission system operations must function independent from the employees of its Marketing and Energy Affiliates.

(b) A Transmission Provider must treat all transmission customers, affiliated and non-affiliated, on a non-discriminatory basis, and must not operate its transmission system to preferentially benefit its Marketing or Energy Affiliates.

## **3.0 Definitions.**

(a) Transmission Provider means:

(1) Any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce

(2) Reserved

(3) Reserved

(b) Affiliate means:

(1) Another person which controls, is controlled by or is under common control with, such person. An Affiliate includes a division that operates as a functional unit, and

(2) For any exempt wholesale generator, as defined under 32(a) of the Public Utility Holding Company Act of 1935, as amended, the same as provided in Section 214 of the Federal Power Act.

(c) Control (including the terms "controlling," "controlled by," and "under common control with") as used in this standard, includes, but is not limited to, the possession, directly or indirectly and whether acting alone or in conjunction with others, of the authority to direct or cause the direction of the management or policies of a company. A voting interest of 10 percent or more creates a rebuttable presumption of control.

(d) Energy Affiliate means an affiliate of a Transmission Provider that:

(1) Engages in or is involved in transmission transactions in U.S. energy or transmission markets; or

(2) Manages or controls transmission capacity of a Transmission Provider in U.S. energy or transmission markets; or

(3) Buys, sells, trades or administers electric energy in U.S. energy or transmission markets; or

(4) Engages in financial transactions relating to the sale or transmission of electric energy in U.S. energy or transmission markets.



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**Requesters: NAESB Electronic Scheduling Subcommittee  
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- (5) An LDC division of an electric public utility Transmission Provider shall be considered the functional equivalent of an Energy Affiliate, unless it qualifies for the exemption in Requirement 3.0(d)(6)(v).
- (6) An Energy Affiliate does not include:
- (i) A foreign affiliate that does not participate in U.S. energy markets;
  - (ii) An affiliated Transmission Provider which is regulated by the state, provincial or national regulatory boards of the foreign country in which such facilities are located;
  - (iii) A holding, parent or service company that does not engage in energy commodity markets or is not involved in transmission transactions in U.S. energy markets;
  - (iv) An affiliate that purchases energy solely for its own consumption. "Solely for its own consumption" does not include the purchase of energy for subsequent generation of electricity.
  - (v) A State-regulated local distribution company that acquires interstate transmission capacity to purchase and resell gas only for on-system sales, and otherwise does not engage in the activities described in Requirement 3.0 (d)(1), (2), (3) or (4), except to the limited extent necessary to support on-system sales and to engage in de minimus sales necessary to remaining in balance under applicable pipeline tariff requirements.
  - (vi) A producer, gatherer, Hinshaw pipeline or an intrastate pipeline that makes incidental purchases or sales of de minimus volumes of natural gas to remain in balance under applicable pipeline tariff requirements and otherwise does not engage in the activities described in Requirement 3.0 (d)(1), (2), (3) or (4).
- (e) Marketing, sales or brokering means a sale for resale of electric energy in interstate commerce. Sales and marketing employee or unit includes:
- (1) Reserved
  - (2) A public utility Transmission Provider's energy sales unit, unless such unit engages solely in bundled retail sales.
  - (3) Reserved
- (f) Transmission means electric transmission, network or point-to-point service, reliability service, ancillary services or other methods of transportation or the interconnection with jurisdictional transmission facilities.
- (g) Transmission Customer means any eligible customer, shipper or designated agent that can or does execute a transmission service agreement or can or does receive transmission service, including all persons who have pending requests for transmission service or for information regarding transmission.
- (h) Open Access Same-time Information System or OASIS refers to the Internet location where a public utility posts the information, by electronic means, required by Standard 1 of the NAESB Business Practices for Open Access Same-Time Information Systems.
- (i) Reserved
- (j) Transmission Function employee means an employee, contractor, consultant or agent of a Transmission Provider who conducts transmission system operations or reliability



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functions, including, but not limited to, those who are engaged in day-to-day duties and responsibilities for planning, directing, organizing or carrying out transmission-related operations.

(k) Marketing Affiliate means an affiliate as that term is defined in Requirement 3.0(b) or a unit that engages in marketing, sales or brokering activities as those terms are defined at Requirement 3.0(e).

**4.0 Independent functioning.**

(a) Separation of functions.

(1) Except in emergency circumstances affecting system reliability, the transmission function employees of the Transmission Provider must function independently of the Transmission Provider's Marketing or Energy Affiliates' employees.

(2) Notwithstanding any other provisions in this requirement, in emergency circumstances affecting system reliability, a Transmission Provider may take whatever steps are necessary to keep the system in operation. Transmission Providers must report to the Commission and post on the OASIS each emergency that resulted in any deviation from the standards of conduct, within 24 hours of such deviation.

(3) The Transmission Provider is prohibited from permitting the employees of its Marketing or Energy Affiliates from:

- (i) Conducting transmission system operations or reliability functions; and
- (ii) Having access to the system control center or similar facilities used for transmission operations or reliability functions that differs in any way from the access

available to other transmission customers.

(4) Transmission Providers are permitted to share support employees and field and

maintenance employees with their Marketing and Energy Affiliates.

(5) Transmission Providers are permitted to share with their Marketing or Energy Affiliates senior officers and directors who are not "Transmission Function Employees" as that term is defined in Requirement 3.0(j). A Transmission Provider may share transmission information covered by Requirement 5.0(a) and (b) with its shared senior officers and directors provided that they do not participate in directing, organizing or executing transmission system operations or marketing functions; or act as a conduit to share such information with a Marketing or Energy Affiliate.

(6) Transmission Providers are permitted to share risk management employees that are not engaged in Transmission Functions or sales or commodity Functions with their Marketing and Energy Affiliates.

(b) Identifying affiliates on the public Internet.

(1) A Transmission Provider must post the names and addresses of its Marketing and Energy Affiliates on its OASIS.



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(2) A Transmission Provider must post on its OASIS a complete list of the facilities shared by the Transmission Provider and its Marketing or Energy Affiliates, including the types of facilities shared and their addresses.

(3) A Transmission Provider must post comprehensive organizational charts showing:

(i) The organizational structure of the parent corporation with the relative position

in the corporate structure of the Transmission Provider, Marketing and Energy Affiliates;

(ii) For the Transmission Provider, the business units, job titles and descriptions, and chain of command for all positions, including officers and directors, with the exception of clerical, maintenance, and field positions. The job titles and descriptions must include the employee's title, the employee's duties, whether the employee is involved in transmission or sales, and the name of the supervisory employees who manage non-clerical employees involved in transmission or sales.

(iii) For all employees who are engaged in transmission functions for the Transmission Provider and marketing or sales functions or who are engaged in transmission functions for the Transmission Provider and are employed by any of the Energy Affiliates, the Transmission Provider must post the name of the business unit within the marketing or sales unit or the Energy Affiliate, the organizational structure in which the employee is located, the employee's name, job title and job description in the marketing or sales unit or Energy Affiliate, and the employee's position within the chain of command of the Marketing or Energy Affiliate.

(iv) The Transmission Provider must update the information on its OASIS, required by Requirement 4.0 (b) (1), (2) and (3) within seven business days of any change, and post the date on which the information was updated.

(v) The Transmission Provider must post information concerning potential merger partners as affiliates within seven days after the potential merger is announced.

(vi) All OASIS postings required by this standard must comply, as applicable, with the requirements of Standard 1.3 of the NAESB Business Practices for Open Access Same-Time Information Systems.

(c) Transfers. Employees of the Transmission Provider, Marketing or Energy Affiliates are not precluded from transferring among such functions as long as such transfer is not used as a means to circumvent the Standards of Conduct. Notices of any employee transfers between the Transmission Provider, on the one hand, and the Marketing or Energy Affiliates, on the other, must be posted on the OASIS. The information to be posted must include: the name of the transferring employee, the respective titles held while performing each function (i.e., on behalf of the Transmission Provider, Marketing or Energy Affiliate), and the effective date of the transfer. The information posted under this requirement must remain on the OASIS for 90 days.



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(d) Books and records. A Transmission Provider must maintain its books of account and records (as prescribed in Chapter I, Title 18 CFR) separately from those of its Energy Affiliates and these must be available for Commission inspections

(e) Written procedures.

(1) By [insert date that is 60 days after publication in the FEDERAL REGISTER], each Transmission Provider is required to file with the Commission and post on the OASIS a plan and schedule for implementing the standards of conduct.

(2) Each Transmission Provider must be in full compliance with the Standards of Conduct by September 22, 2004.

(3) The Transmission Provider must post on the OASIS current written procedures implementing the standards of conduct in such detail as will enable customers and the Commission to determine that the Transmission Provider is in compliance with the requirements of this requirement by September 22, 2004 or within 30 days of becoming subject to the requirements of this standard.

(4) Transmission Providers will distribute the written procedures to all Transmission Provider employees and employees of the Marketing and Energy Affiliates.

(5) Transmission Providers shall train officers and directors as well as employees with access to transmission information or information concerning electric purchases, sales or marketing functions. The Transmission Provider shall require each employee to sign a document or certify electronically signifying that s/he has participated in the training.

(6) Transmission Providers are required to designate a Chief Compliance Officer who will be responsible for standards of conduct compliance.

**5.0 Non-discrimination requirements.**

(a) Information access.

(1) The Transmission Provider must ensure that any employee of the its Marketing or Energy Affiliate may only have access to that information available to the Transmission Provider's transmission customers (i.e., the information posted on the OASIS) and must not have access to any information about the Transmission Provider's transmission system that is not available to all users of an OASIS.

(2) The Transmission Provider must ensure that any employee of its Marketing or Energy Affiliate is prohibited from obtaining information about the Transmission Provider's transmission system (including, but not limited to, information about available transmission capability, price, curtailments, storage, ancillary services, balancing, maintenance activity, capacity expansion plans or similar information) through access to information not posted on the OASIS or that is not otherwise also available to the general public without restriction.

(b) Prohibited disclosure.

(1) An employee of the Transmission Provider may not disclose to its Marketing or Energy Affiliates any information concerning the transmission system of the Transmission Provider or the transmission system of another (including, but not



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limited to, information received from non-affiliates or information about available transmission capability, price, curtailments, storage, ancillary services, balancing, maintenance activity, capacity expansion plans, or similar information) through non-public communications conducted off the OASIS, through access to information not posted on the OASIS that is not contemporaneously available to the public, or through information on the OASIS that is not at the same time publicly available.

(2) A Transmission Provider may not share any information, acquired from nonaffiliated transmission customers or potential nonaffiliated transmission customers, or developed in the course of responding to requests for transmission or ancillary service on the OASIS with employees of its Marketing or Energy Affiliates, except to the limited extent information is required to be posted on the OASIS in response to a request for transmission service or ancillary services.

(3) If an employee of the Transmission Provider discloses information in a manner contrary to the requirements of Requirement 5.0 (b)(1) and (2), the Transmission Provider must immediately post such information on the OASIS.

(4) A non-affiliated transmission customer may voluntarily consent, in writing, to allow the Transmission Provider to share the non-affiliated customer's information with a Marketing or Energy Affiliate. If a non-affiliated customer authorizes the Transmission Provider to share its information with a Marketing or Energy Affiliate, the Transmission Provider must post notice on the OASIS of that consent along with a statement that it did not provide any preferences, either operational or rate-related, in exchange for that voluntary consent.

(5) A Transmission Provider is not required to contemporaneously disclose to all transmission customers or potential transmission customers information covered by Requirement 5.0 (b)(1) if it relates solely to a Marketing or Energy Affiliate's specific request for transmission service.

(6) A Transmission Provider may share generation information necessary to perform generation dispatch with its Marketing and Energy Affiliate that does not include specific information about individual third party transmission transactions or potential transmission arrangements.

(7) Neither a Transmission Provider nor an employee of a Transmission Provider is permitted to use anyone as a conduit for sharing information covered by the prohibitions of Requirement 5.0 (b)(1) and (2) with a marketing or Energy Affiliate. A Transmission Provider may share information covered by Requirement 5.0 (b)(1) and (2) with employees permitted to be shared under Requirement 4.0 (a)(4), (5) and (6) provided that such employees do not act as a conduit to share such information with any Marketing or Energy Affiliates.

(8) A Transmission Provider is permitted to share information necessary to maintain the operations of the transmission system with its Energy Affiliates.



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**Requesters: NAESB Electronic Scheduling Subcommittee  
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**Approved by the Executive Committee on November 16, 2004**

(c) Implementing tariffs.

- (1) A Transmission Provider must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if these tariff provisions do not permit the use of discretion.
- (2) A Transmission Provider must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all transmission customers in a non-discriminatory manner, if these tariff provisions permit the use of discretion.
- (3) A Transmission Provider must process all similar requests for transmission in the same manner and within the same period of time.
- (4) The Transmission Provider must maintain a written log, available for Commission audit, detailing the circumstances and manner in which it exercised its discretion under any terms of the tariff. The information contained in this log is to be posted on the OASIS within 24 hours of when a Transmission Provider exercises its discretion under any terms of the tariff.
- (5) The Transmission Provider may not, through its tariffs or otherwise, give preference to its own Marketing or Energy Affiliate, over any other wholesale customer in matters relating to the sale or purchase of transmission service (including, but not limited to, issues of price, curtailments, scheduling, priority, ancillary services, or balancing).

(d) Discounts.

Any offer of a discount for any transmission service made by the Transmission Provider must be posted on the OASIS contemporaneous with the time that the offer is contractually binding. The posting must include: the name of the customer involved in the discount and whether it is an affiliate or whether an affiliate is involved in the transaction, the rate offered; the maximum rate; the time period for which the discount would apply; the quantity of power scheduled to be moved; the delivery points under the transaction; and any conditions or requirements applicable to the discount. The posting must remain on the OASIS for 60 days from the date of posting.

#### **4. SUPPORTING DOCUMENTATION**

**a. Description of Request:**

FERC Orders 2004, 2004A and 2004B detail modified Standards of Conduct for Transmission Providers(Chapter I, Title18 CFR Part 358), to replace the current Standards of Conduct language contained in Requirement 1.4 of the NAESB Business Practices for Open Access Same-Time Information Systems.

**b. Description of Recommendation:**

Adopt standards as recommended.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: NAESB Electronic Scheduling Subcommittee  
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**Approved by the Executive Committee on November 16, 2004**

**c. Business Purpose:**

Adopt Standard of Conduct requirements consistent with FERC Orders 2004, 2004A, and 2004B.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

Discussion on this recommendation can be found in the following minutes:

WEQ ESS/ ITS	May 26-27, 2004	<a href="http://www.naesb.org/pdf/weq_ess_its052604dm.doc">http://www.naesb.org/pdf/weq_ess_its052604dm.doc</a>
WEQ ESS/ ITS	July 28-29, 2004	
WEQ ESS/ ITS	August 17, 2004	





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Electronic Scheduling Subcommittee and  
 Information Technology Subcommittee

**Request No.:** R04006-B

**Request Title:** OASIS 1A Enhancements – Multiple Requests

**Approved by the Executive Committee on November 16, 2004**

**1. RECOMMENDED ACTION:**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT  
 RECOMMENDED ACTION:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

- Initiation
- Modification
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- Principle
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**Per Recommendation:**

- Initiation
- Modification
- Interpretation
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- Principle
- Definition
- Business Practice Standard
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**3. RECOMMENDATION**

**SUMMARY:** This recommendation modifies the OASIS Business Practices in order to provide a mechanism by which transmission providers can mitigate problems associated with Denial of Service attacks or grossly inefficient use of OASIS. The particular cases addressed by this standard are,

- Denial of Service,
- Queue Flooding, and
- Queue Hoarding.

In addition this recommendation suggests consolidation of all definitions from 1.3 and new definitions from this recommendation into a separate section preceding the OASIS



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and  
Information Technology Subcommittee**

**Request No.: R04006-B**

**Request Title: OASIS 1A Enhancements – Multiple Requests**

**Approved by the Executive Committee on November 16, 2004**

Business Practices. All content is removed from section 1.3 and is reserved for future use.

**RECOMMENDED STANDARDS:**

The following definitions section is to be added to the OASIS Business Practices. It shall consist of definitions previously in Requirement 1.3 and new definitions resulting from the business practices proposed in this recommendation. The new definitions are underlined.

**Definitions** – the following definitions are applicable to the OASIS Business Practices:

**Affiliate-**

(1) For any exempt wholesale generator, as defined under section 32(a) of the Public Utility Holding Company Act of 1935, as amended, the same as provided in section 214 of the Federal Power Act; and

(2) For any other entity, the term affiliate has the same meaning as given in 18 CFR 161.2(a).

**Commission** - the Federal Energy Regulatory Commission.

**Denial of Service** – this is the intentional or unintentional degradation of OASIS performance that impacts all customer interactions with OASIS by consuming cyber resources.

**Identical Service Requests** – “identical service requests” are those OASIS transmission service requests that have exactly the same values for the following OASIS template Data Elements:

- CUSTOMER\_CODE
- CUSTOMER\_DUNS
- SERVICE\_INCREMENT
- TS\_CLASS
- START\_TIME
- STOP\_TIME
- POR\*
- POD\*
- PATH\*

\* Service requests where any combination of PATH, POR and/or POD represent exactly the same commercial transmission elements shall be considered as “having the exact same value.”

**Queue Flooding** – excessive submission of identical service requests.



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**Queue Hoarding** – this is the act, intentionally or unintentionally, of not confirming or withdrawing an accepted service request such that it impacts the ability of other willing buyers to secure service in a timely fashion.

**Responsible party** - the Transmission Provider or an agent to whom the Transmission Provider has delegated the responsibility of meeting any of the requirements of this part.

**Reseller** - any Transmission Customer who offers to sell transmission capacity it has purchased.

**Transmission Provider** - any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.

**Transmission Customer** - any eligible customer (or its designated agent) that can or does execute a transmission service agreement or can or does receive transmission service.

**Wholesale merchant function** - the sale for resale of electric energy in interstate commerce.

The following changes are made to the OASIS Business Practices.

**Standard 1.3 Reserved**

The following requirements are added to the OASIS Business Practices.

**Standard 8. Requirements for dealing with multiple, identical transmission service requests.**

**8.1 Denial of Service** - OASIS system administrators or Transmission Providers shall have the right to institute programs for the detection and mitigation of Denial of Service (DoS) attacks based on recognized standard industry practices.

**8.1.1** OASIS system administrators or Transmission Providers shall have the right to block a user's large volume or high frequency submission of transmission service requests that are syntactically invalid and/or do not constitute a valid, legitimate request for service under the terms of the Transmission Provider's tariff (i.e., cannot be queued by OASIS for evaluation by the Transmission Provider) pursuant to the provisions in NAESB OASIS Business Practice Standard 1.5(d).



## RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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**8.2 Queue Flooding** - OASIS system administrators or Transmission Providers shall have the right to invalidate the submission of additional **identical service requests** by a given Transmission Customer when the sum of the capacity requested in all preceding, pending, valid **identical service requests** for that Transmission Customer equals or exceeds the impacted transmission facilities' Total Transfer Capability at any point in time over the duration of such requests.

**8.3 Queue Hoarding** - OASIS system administrators or Transmission Providers shall have the right to institute processes and procedures to limit the ability of a given Transmission Customer to delay the timely processing of transmission requests submitted by other Transmission Customers.

**8.3.1** When transmission service requests are queued for a limited transmission facility(ies) such that the Transmission Provider must wait for a given Transmission Customer to act on an accepted request for service prior to accepting or denying subsequent requests for service, the Transmission Provider shall have the right to deny and remove from consideration all subsequent **identical service requests** submitted by the same Transmission Customer should that Transmission Customer explicitly (i.e., withdraws their request) or implicitly (i.e., fails to confirm the request within the confirmation time limit) elect not to take service over the limited facility(ies).

**8.3.2** Transmission Providers shall have the right to restrict the Customer Confirmation Time Limit, as established in Standard 4.13, in the event the confirmation time limit would extend beyond the Provider's established scheduling deadline. But in no event shall the TP impose such restrictions that would set the confirmation time limit to expire any earlier than 30 minutes before the pro forma scheduling deadline.



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**Appendix – Standard 8 Examples**

8.3 Queue Hoarding

The following example assumes that the Transmission Provider made an assessment of their Firm ATC on path IN-OUT in response to ABC's submission of a reservation request at 08:12:01. The TP determined the Firm ATC to be 30 MW for 8/5/2004, which is sufficient to satisfy the first queued request. Following this evaluation, the TP accepts the first queued request from ABC at 11:30. The TP delays acting on the next request from LMN since whether it is counteroffered with "interim partial service" or accepted in total until the disposition of ABC's request is determined. For this example, the TPs reservation queue at 11:30 on 8/2/2004 is shown in the following table.

CUSTOMER_CODE	CUSTOMER_DUNS	SERVICE_INCREMENT	TS_CLASS	START_TIME	STOP_TIME	POR	POD	PATH	MW	STATUS	QUEUE_TIME
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	20	ACCEPTED	2004-08-02 08:12:01CS
LMN	567890123	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	15	QUEUED	2004-08-02 08:23:10CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	QUEUED	2004-08-02 08:45:06CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	QUEUED	2004-08-02 09:00:33CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	QUEUED	2004-08-02 10:01:16CS
XYZ	987654321	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	5	QUEUED	2004-08-02 10:57:41CS
LMN	567890123	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	15	QUEUED	2004-08-02 08:23:10CS



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The Standard Customer Confirmation Time Limit for ABC is 24 hours, and the TP may retract their acceptance of ABC's request on expiration of this confirmation time limit. Standard Requirement 8.3.2 also gives the TP the right to remove from consideration (deny using STATUS of INVALID) all **identical service requests** from ABC should ABC elect to not confirm their first accepted request. Assuming ABC takes no action on their first accepted request, the following table shows the results of exercising Requirement 8.3.2. To prevent the subsequent requests from ABC delaying the TP acting on other Customer requests from LMN and XYZ for another 24 hour confirmation time limit, the TP removes ABC's requests from the queue since they already had the option to purchase 20 MWs of capacity and elected not to do so. The first LMN and XYZ requests are accepted, but again the second LMN request cannot be acted upon until the disposition of these two accepted requests is determined.

CUSTOMER_CODE	CUSTOMER_DUNS	SERVICE_INCREMENT	TS_CLASS	START_TIME	STOP_TIME	POR	POD	PATH	MW	STATUS	QUEUE_TIME
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	20	RETRACTED	2004-08-02 08:12:01CS
LMN	567890123	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	15	ACCEPTED	2004-08-02 08:23:10CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	INVALID	2004-08-02 08:45:06CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	INVALID	2004-08-02 09:00:33CS
ABC	123456789	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	10	INVALID	2004-08-02 10:01:16CS
XYZ	987654321	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	5	ACCEPTED	2004-08-02 10:57:41CS
LMN	567890123	DAILY	FIRM	2004-08-05 00:00:00 CS	2004-08-06 00:00:00 CS	IN	OUT	IN-OUT	15	QUEUED	2004-08-02 08:23:10CS



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#### **4. SUPPORTING DOCUMENTATION**

##### **a. Description of Request:**

##### **Multiple Submissions of Identical Transmission Requests / Queuing Issues**

OASIS business rules are very similar across most providers. In general, customers submitting transmission request have time periods when they can “queue” their requests. This queue process and the way it relates to the Internet can create issues when customers are “battling” for ATC on constrained interfaces. Many customers have automated the submission of transmission requests. In order to ensure their place in the queue, these customers schedule these requests to be submitted as a scheduled event. To account for delays caused by the Internet and the nature of web server systems, customers usually submit multiple copies of the same request beginning a few minutes before the top of the hour and lasting until well after the top of the hour. The issues created by duplicate request submittal are fairly straightforward. Backend systems and the operators working those systems are impacted dramatically. Each request that arrives after the top of the hour is a valid request. Therefore, the provider can have hundreds of requests in the queue that will never be confirmed. Other issues that are created are related to OASIS performance. Anyone using transstatus to retrieve a list of OASIS requests submitted during a time period similar to the one described above can receive hundreds of bogus requests and only a hand full of legitimate requests. Also, while the systems are busy working on the bogus requests, valid requests can be delayed due to bottlenecks created by this issue.

##### **b. Description of Recommendation:**

The standards recommended are intended to address three basic issues that have been noted in the operation of OASIS:

- Denial of Service – this is the intentional or unintentional degradation of OASIS performance that impacts all customer interactions with OASIS either through the flooding of the OASIS network connection with messages (OASIS specific or not), or excessive or grossly inefficient queries for, or submission of, data to OASIS.
- Queue Flooding – this is the excessive submission of specific transmission service requests, intentionally or unintentionally, in an attempt to hit a window in service availability and gain priority based on OASIS queued time.
- Queue Hoarding – this is the act, intentionally or unintentionally, of delaying a decision to confirm or withdraw an accepted service request such that it impacts the ability of other willing buyers to secure service in a timely fashion.

The Denial of Service standard recommendation establishes how an OASIS system administrator should deal with perceived DoS attacks. Specifically, it allows the administrator to use industry recognized processes and procedures to detect a pattern consistent with a DoS attack and take mitigating action. True DoS attacks are not necessarily targeted at simply compromising an OASIS system, and are typically implemented in network communications devices (e.g., routers, firewalls, etc.). Procedures relative to perceived DoS type of performance impacts specifically related to OASIS messaging are to be implemented in compliance with FERC Order 605.



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The Queue Flooding standard attempts to establish a minimum standard by which an OASIS system would screen multiple requests to limit the total number of transmission service reservations queued by any one given Transmission Customer. The criteria to which the OASIS may limit such requests (TTC) is intentionally conservative until operational experience dictates that there is a sufficient, documented operational problem that warrants being more restrictive.

The Queue Hoarding standard attempts to provide some mitigation of operational concerns that were originally addressed by the MIC in Docket No. RM95-9-013. The standard does not convey any preference to pre-confirmed service requests, nor limit any Transmission Customer from exercising their full rights to the confirmation time limits imposed by FERC Order 638. Instead, it specifies that once a Customer explicitly (by setting request status to WITHDRAWN) or implicitly (by allowing request status to be set to RETRACTED) declines to purchase service offered by the Transmission Provider, they forfeit all rights to purchase identical service requested in subsequently queued reservations. The Customer, in these cases, has opted to not purchase the service offered, which raises the question whether they truly intend to purchase service at all. These Customers may be intentionally “hoarding” transmission capacity by exercising their priority in the queue and customer confirmation time limit rights to block other willing buyers from purchasing transmission service.

Finally, recommendations to supplement FERC Order 638 Business Practice Standard 4.13 are proposed to eliminate the possibility for a single transmission service request to block all subsequent service requests until after the Firm and Non-Firm scheduling deadlines as specified in the Pro Forma Tariff (e.g., 10:00am and 2:00pm of day prior to service respectively. Note that there was not consensus within the OASIS 1A Task Force as to whether to propose modifications to the existing Order 638 Timing Standards. The recommendation therefore presents several alternatives for consideration as Standard Z.2:

- Silence - existing Order 638 standards are sufficient to address the concerns,
- Reinforcement of TP right to institute timing requirements such that confirmation time limits do not extend scheduling deadlines,
- Recommended confirmation time limit changes in fixed steps based on time prior to start of service to eliminate the possibility for a single transmission service request to block all subsequent service requests, or
- Recommended confirmation time limit changes on a sliding time frame based on time prior to start of service to eliminate the possibility for a single transmission service request to block all subsequent service requests.

In support of the Recommendation Multiple Requests to the NAESB Executive Committee for a proposed business practice standard, please see the following sets of minutes.

WEQ OASIS 1A Task Force	February 13, 2004	<a href="http://www.gisb.org/pdf/weq_oasis1a_021304fm.doc">http://www.gisb.org/pdf/weq_oasis1a_021304fm.doc</a>
	July 14, 2004	<a href="http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc">http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc</a>
WEQ ESS/ITS	December 15-16, 2003	<a href="http://www.gisb.org/pdf/weq_ess121503fm.pdf">http://www.gisb.org/pdf/weq_ess121503fm.pdf</a>
	January 8, 2004	<a href="http://www.gisb.org/pdf/weq_ess010804fm.pdf">http://www.gisb.org/pdf/weq_ess010804fm.pdf</a>





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February 17-18, 2004	<a href="http://www.gisb.org/pdf/weq_ess021704fm.doc">http://www.gisb.org/pdf/weq_ess021704fm.doc</a>
April 6, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its040604fm.doc">http://www.gisb.org/pdf/weq_ess_its040604fm.doc</a>
May 26-27, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its052604fm.doc">http://www.gisb.org/pdf/weq_ess_its052604fm.doc</a>
July 28-29, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its072804fm.doc">http://www.gisb.org/pdf/weq_ess_its072804fm.doc</a>
August 17, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its081704fm.doc">http://www.gisb.org/pdf/weq_ess_its081704fm.doc</a>
September 2, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its090204fm.doc">http://www.gisb.org/pdf/weq_ess_its090204fm.doc</a>
September 29-30, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its092904dm.doc">http://www.gisb.org/pdf/weq_ess_its092904dm.doc</a>

**c. Business Purpose:**

The recommended standards are intended to establish clear processes and procedures to be taken in OASIS to address operational concerns of the Industry.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

The recommended standards are intended to address OASIS operational concerns that have been, at least in part, attempted to be addressed in prior FERC filings and orders. FERC issued Order 605 (Docket No. RM98-3-000) in May 1999 to specifically deal with the issue of automated access to OASIS and the performance impacts of excessive or grossly inefficient queries for information. The NERC Market Interface Committee, in response to numerous concerns over the queuing of multiple transmission service requests and the impact on OASIS operations, filed a proposed standard to address this issue in Docket No. RM95-9-013. This filing was subsequently denied by the Commission, principally due to:

- No Industry filing of comments in support of the standard
- Language in the standard that allowed application of the standard to be discretionary and therefore difficult to monitor/police (i.e., "...the transmission provider has the right to move to a retracted status...").
- Failure of the standard to address whether change to Transmission Provider response times are necessary, thereby circumventing the need for the standard.

The Subcommittee believes the language in FERC Order 605, and companion business practices standards related to Transmission Provider response and Transmission Customer confirmation time limits in FERC Order 638 (Docket No. RM95-9-003) establish clear guidance with respect to the specific issues they address. The recommended standards are intended to clarify and establish additional business practices with respect to three operational issues: Denial of Service, Queue Flooding, and Queue Hoarding.

The Denial of Service recommendation would allow the OASIS system administrators to use industry standard practices for the detection and mitigation of Denial of Service attacks whether they be due to flooding of a network connection with OASIS specific connection requests or not. The Subcommittee believes the existing provisions in Order 605 establish sufficient guidelines and protections for OASIS administrators to take action against excessive or grossly inefficient means of accessing OASIS data.



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The Queue Flooding recommendation establishes a standard for OASIS to automatically limit the submission of excessive transmission service requests by a given Transmission Customer, or remove such requests from the queue of pending requests. The standard establishes the limit based on the Total Transfer Capability of the transmission system requested (based on path, POR and/or POD). TTC rather than Available Transfer Capability (ATC) was used as the criteria because of the possibility that preceding requests, or changes in system conditions between the time the request is queued and finally evaluated may actually increase the ATC to a level sufficient to support the service requested.

The Queue Hoarding recommendation establishes a standard by which the OASIS would purge the queue of pending, like requests from a given Transmission Customer, if that Customer explicitly or implicitly fails to purchase service offered by the the Transmission Provider, and is therefore preventing other willing buyers from acquiring service in a timely manner. This standard would prevent the submission of multiple frivolous service requests that the Customer has no intention of acting upon.

As a companion to the Queue Hoarding recommendation, the subcommittee is recommending a supplement to the Order 638 Business Practice Standard 4.13 to ensure that the time from a reservation being queued, provider evaluation, and customer confirmation time limit would not encroach on the day-ahead Firm and Non-firm scheduling deadlines in the Pro Forma tariff. Without the suggested changes, there is still the possibility for a single customer's transmission service request to block other customer requests until after the scheduling deadline. This is another example of "queue hoarding" that needed to be addressed by the industry.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Electronic Scheduling Subcommittee and Information Technology Subcommittee

**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

**Approved by the Executive Committee on November 16, 2004**

**1. RECOMMENDED ACTION:**

- Accept as requested
- Accept as modified below
- Decline

**EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:**

- Change to Existing Practice
- Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**Per Recommendation:**

- Initiation
- Modification
- Interpretation
- Withdrawal
  
- Principle
- Definition
- Business Practice Standard
- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:** This recommendation modifies the OASIS Business Practices to establish business practice standards related to the “redirection” of transmission service. These business practices address the provisions of Section 22 in the FERC Pro Forma Open Access Transmission Tariff related to the modification of Points of Receipt and/or Delivery for Firm Point-to-Point Transmission Service.

**RECOMMENDED STANDARDS:**

**Definitions to be added to the OASIS Business Practice standard**

**Capacity Available to Redirect** – the granted capacity of the Parent Reservation at the time of customer confirmation (CAPACITY\_GRANTED) less all confirmed reassignments (e.g., resales), confirmed redirects on a firm basis, confirmed redirects on a non-firm basis, displacements, and approved schedules.



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**Parent Reservation** – an existing, confirmed reservation being modified by a Transmission Customer's request to redirect, reassign, resale, etc.

**Business Practices to be added to the OASIS Business Practice standard**

**Standard 9. Requirements for dealing with Redirects on a Firm basis.**

**9.1** – The Transmission Customer (TC) shall have the right to request modifications to Points of Receipt and/or Points of Delivery (including source or sink, where required) on a firm basis for a Confirmed Point-to-Point Firm Transmission Service reservation (i.e., Parent Reservation). This will be referred to as a Redirect on a Firm basis.

**9.1.1** – The TC may Redirect on a Firm basis any confirmed Firm Point-to-Point Parent Reservation regardless of the request type.

**9.1.2** - A request to Redirect on a Firm basis shall be submitted to the primary Transmission Provider with a request type of REDIRECT.

**9.1.3** - A request to Redirect on a Firm basis shall be queued and treated in the same manner as any other firm point to point request, subject to the other requirements of this standard.

**9.1.4** - No additional deposit shall be required for a request to Redirect on a Firm basis.

**9.2** - The TC shall be allowed to request a Redirect on a Firm basis for a portion or all of the Capacity Available to Redirect, even if the transmission scheduling rights on the Parent Reservation have been limited due to outages or other reliability-related events. An example is shown in Appendix B.

**9.3** - The TC shall be allowed to request a Redirect on a Firm basis for a portion or all of the time period of the Parent Reservation (i.e., bound by the start/stop times of the Parent Reservation). An example is shown in Appendix B.



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**9.3.1** – A request for Redirect on a Firm basis must be submitted, and is subject to all request timing requirements consistent with a reservation for Firm service of similar duration.

**9.3.2** - A request for Redirect on a Firm basis must represent an established Firm Point-to-Point Service Increment (e.g., Daily, Monthly, etc.) offered by the Transmission Provider.

**9.4** The TC's rights on the Parent Reservation shall remain unaffected during the Transmission Provider evaluation of the request to Redirect on a Firm basis.

**9.4.1** - If the request to Redirect on a Firm basis is denied for any reason, all rights and obligations shall remain per the Parent Reservation. An example is shown in Appendix B.

**9.4.2** - The TC shall be allowed to submit and have pending multiple requests for Redirects on a Firm basis against the same Capacity Available to Redirect. The TP shall evaluate each such request with the knowledge that only those requests up to the Capacity Available to Redirect may ultimately be confirmed. An example is shown in Appendix B.

**9.5** - Upon confirmation of the request to Redirect on a Firm basis, the Capacity Available to Redirect shall be reduced by the amount of the redirected capacity for the time period of that Redirect. An example is shown in Appendix B.

**9.5.1** – The TC shall not confirm any request to Redirect on a Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to block any such confirmation. An example is shown in Appendix B.

**9.5.2** – The TC shall withdraw any request to Redirect on a Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to withdraw their acceptance of any request to Redirect on a Firm



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basis that cannot be confirmed due to limitations in the Capacity Available to Redirect by setting the OASIS standard STATUS data element to the value of SUPERSEDED.

**9.5.3** – Redirects on a Firm basis shall have all the rights and obligations of an original reservation for Firm service (with the exception of renewal/roll-over rights), including the rights to be Redirected on a Firm and/or Non-Firm basis.

**9.6** - For the purposes of curtailment and other capacity reductions, confirmed Redirects on a Firm basis shall be treated comparably to all other types of Firm Point-to-Point Service.

**9.6.1** - Curtailments or other capacity reductions to the remaining portion of the reserved capacity on the Parent Reservation shall not affect the Redirect reservation.

**9.6.2** - Curtailments or other capacity reductions affecting the reserved capacity on the Redirect reservation shall not affect the Parent Reservation nor result in a reinstatement of capacity on the Parent Reservation.

**9.7** - Unless otherwise mutually agreed to by the primary provider and original customer, a request for Redirect on a Firm basis does not impact the TC's long term firm renewal rights (e.g., rollover or evergreen rights) on the original path, nor does it confer any renewal rights on the redirected path.

**9.8** - Any differences in charges associated with the Redirect on a Firm basis will be settled in accordance with the Transmission Provider's tariff.

**9.8.1** - If not addressed in the Transmission Provider's tariff or in a Service Agreement, a credit on the Parent Reservation shall be computed as the total reservation charge divided by the total megawatt hours reserved times the megawatt hours redirected. The redirected reservation shall be charged as if it were a reservation with a request type of ORIGINAL.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and  
Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Approved by the Executive Committee on November 16, 2004**

**Standard 10. Requirements for dealing with Redirects on a Non-Firm basis.**

**10.1** – The Transmission Customer (TC) shall have the right to request an alternate, or secondary, Point of Receipt and/or Point of Delivery (including source and sink, if required) on a non-firm basis for a Confirmed Point-to-Point Firm Transmission Service reservation (i.e., Parent Reservation). This will be referred to as a Redirect on a Non-Firm basis.

**10.1.1** – The TC may Redirect on a Non-Firm basis any confirmed Firm Point-to-Point Parent Reservation regardless of the request type.

**10.1.2** - A request to Redirect on a Non-Firm basis shall be submitted to the primary Transmission Provider with a request type of REDIRECT.

**10.1.3** - A request to Redirect on a Non-Firm basis shall be queued and treated in the same manner as any other non-firm point to point request, subject to the other requirements of this standard.

**10.1.4** - Redirects on a Non-Firm basis shall have a service priority that is lower than non-firm hourly point-to-point service.

**10.1.5** - Requests for Redirects on a Non-Firm basis shall specify the following transmission service attributes in their request:

**TS\_CLASS=SECONDARY**

**TS\_TYPE=POINT\_TO\_POINT**

**TS\_PERIOD, TS\_WINDOW, and SERVICE\_INCREMENT** shall specify any valid value offered by the TP for Non-Firm Point-to-Point service.

**10.1.6** – Requests for Redirects on a Non-Firm basis shall be submitted by the TC as pre-confirmed.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
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**Approved by the Executive Committee on November 16, 2004**

**10.2** - The TC shall be allowed to request a Redirect on a Non-Firm basis for a portion or all of the Capacity Available to Redirect, even if the transmission scheduling rights on the Parent Reservation have been limited due to outages or other reliability-related events. An example is shown in Appendix B.

**10.3** - The TC shall be allowed to request a Redirect on a Non-Firm basis for a portion or all of the time period of the Parent Reservation (i.e., bound by the start/stop times of the Parent Reservation). An example is shown in Appendix B.

**10.3.1** – A request for Redirect on a Non-firm basis must be submitted, and is subject to all request timing requirements consistent with reservations for Non-Firm Point-to-Point service of similar duration.

**10.4** The TC's rights on the Parent Reservation shall remain unaffected during the Transmission Provider evaluation of the request to Redirect on a Non-Firm basis.

**10.4.1** - If the request to Redirect on a Non-Firm basis is denied for any reason, all rights and obligations shall remain per the Parent Reservation. An example is shown in Appendix B.

**10.4.2** - The TC shall be allowed to submit and have pending multiple requests for Redirects on a Non-Firm basis against the same Capacity Available to Redirect. The TP shall evaluate each such request with the knowledge that only those requests up to the Capacity Available to Redirect may ultimately be confirmed. An example is shown in Appendix B.

**10.5** - Upon confirmation of the request to Redirect on a Non-Firm basis, the Capacity Available to Redirect shall be reduced by the amount of the redirected capacity for the time period of that Redirect. An example is shown in Appendix B.

**10.5.1** – The TC shall not confirm any request to Redirect on a Non-Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to block any such confirmation.





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**For Quadrant: Wholesale Electric Quadrant**

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**Approved by the Executive Committee on November 16, 2004**

**10.5.2** – The TC shall withdraw any request to Redirect on a Non-Firm basis that would exceed the Capacity Available to Redirect at that point in time (i.e., at the time of attempted confirmation and over the time interval of the Redirect). The TP shall have the right to withdraw their acceptance of any request to Redirect on a Non-Firm basis that cannot be confirmed due to limitations in the Capacity Available to Redirect by setting the OASIS standard STATUS data element to the value of SUPERSEDED.

**10.5.3** – The TC shall have the right to request the TP to release capacity associated with a confirmed request to Redirect on a Non-Firm basis and reinstate that capacity to the Parent (Firm) Reservation. The TP shall honor all such requests, and reinstate the capacity on the Parent Reservation such that it may subsequently be scheduled, Redirected on a Firm or Non-Firm basis to a different path, resold, etc.

**10.6** - For the purposes of curtailment and other capacity reductions, confirmed Redirects on a Non-Firm basis shall be treated comparably to all other types of Non-Firm Secondary Point-to-Point Service.

**10.6.1** - Curtailments or other capacity reductions to the remaining portion of the reserved capacity on the Parent Reservation shall not affect the Redirect reservation.

**10.7** – Any differences in charges associated with a Redirect on a Non-Firm basis will be settled in accordance with the Transmission Provider's tariff.

**10.7.1** – Unless otherwise provided for in the TP's tariff, there shall be no charge to Redirect on a Non-Firm basis.

**10.8** - TPs shall have the right, but are in no means obligated, to accept requests for Redirect on a Non-Firm basis based on the submission of an Electronic Tag (ETAG) using protocols compliant with Version 1.7.095 NERC Transaction Information System Working Group (TISWG) *Electronic Tagging Functional Specification*.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

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**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Approved by the Executive Committee on November 16, 2004**

**10.8.1** - The TC submitting a Redirect on a Non-Firm basis via a tag shall be subject to the same transaction timing requirements specified for submission of such requests directly on OASIS.

**10.8.2** - A TP accepting Redirects on a Non-Firm basis via ETAG shall allow a TC to request redirected service for one or more path segments of the tag by designating:

- (a) 1-NS as the transmission product code under the OASIS block,
- (b) the OASIS reservation identifier of the Firm Parent Reservation to be redirected, and
- (c) the secondary points of receipt and delivery being requested.

**10.8.3** - A TP accepting Redirects on a Non-Firm basis via ETAG shall determine the amount of the redirect request from:

- (a) The amount of the TP Product.
- (b) If the TP Product is not specified, the MW amount at the POR or POD for that TP in the Loss Table in accordance with the TP's tariff
- (c) , if neither TP Product amount nor Provider Loss Table amounts are specified, the MW amount in the Energy Profile.

**10.8.4** - A TP accepting Redirects on a Non-Firm basis via ETAG shall consider the ETAG as a pre-confirmed Redirect request on a Non-Firm basis that is to be processed on a comparable basis with all such requests made directly on OASIS, with all obligations associated with such a request to be borne by the TC holding the Parent Reservation (e.g., any ancillary services, charges or credits for redirect, etc.), and subject to all other requirements of this Standard.

**10.8.5** - The OASIS queue time of a Redirect requested via ETAG shall be the TP's ETAG Approval Service receipt time, unless a system failure requires the use of backup procedures, in which case the OASIS queue time shall be the time the ETAG is received by the TP.

**10.8.6** - Once an ETAG designating 1-NS service becomes implemented, the TP shall consider the associated Redirect request(s) to be confirmed.



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## **Appendix B – Redirect Standards Examples**

### **Standard 9.2 and 10.2**

The Capacity requested for Redirects on a Firm or Non-Firm basis must be within the Capacity Available to Redirect of the Parent Reservation.



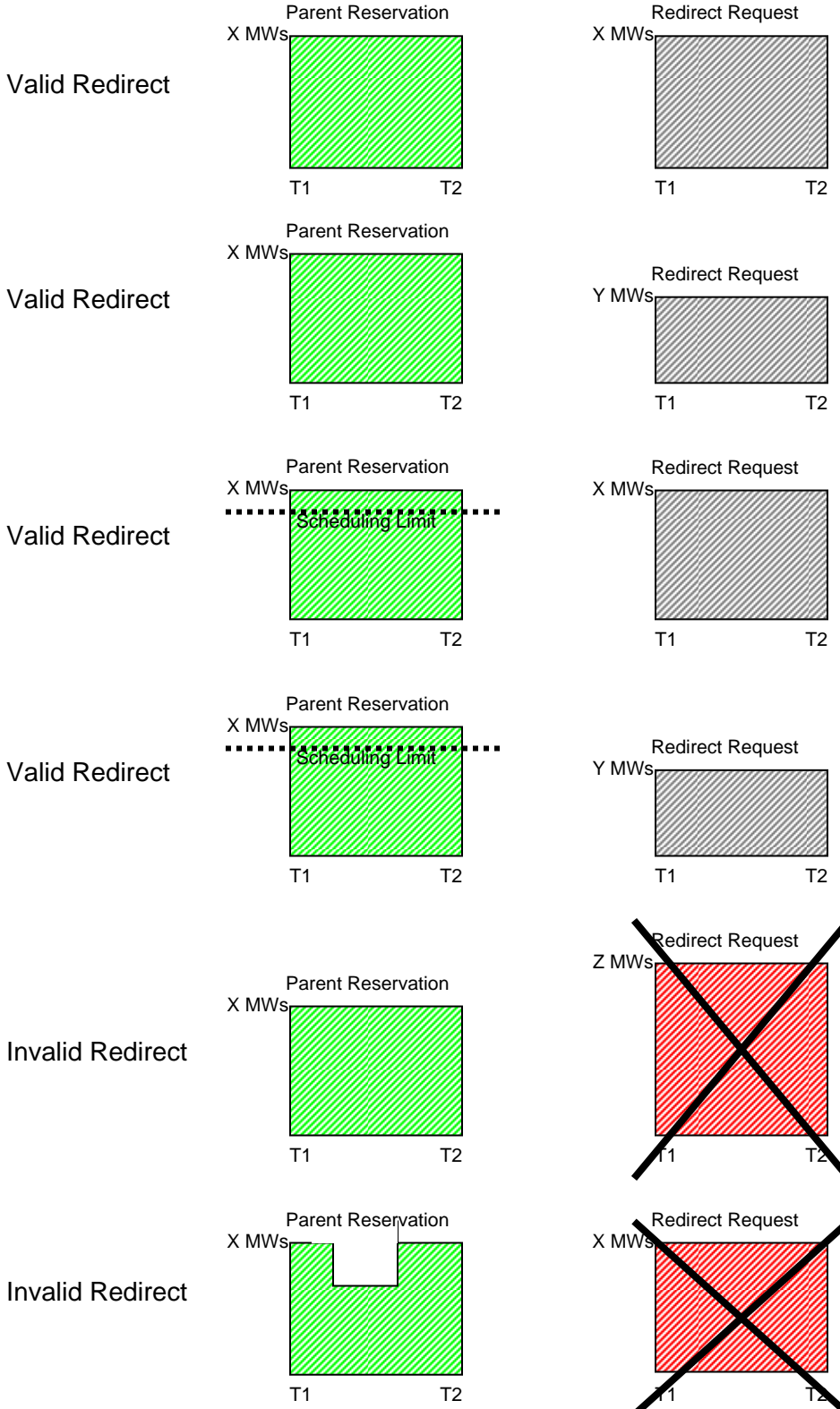
**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

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**Requesters:** Electronic Scheduling Subcommittee and  
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**Request No.:** R04006-C

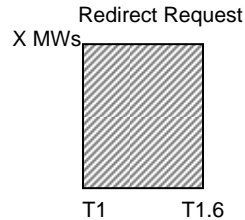
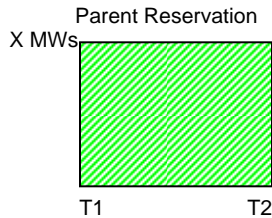
**Request Title:** OASIS 1A Enhancements – Redirects

**Approved by the Executive Committee on November 16, 2004**

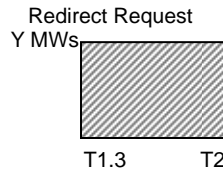
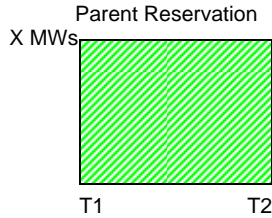
**Standard 9.3 and 10.3**

The Start/Stop times requested for Redirects on a Firm or Non-Firm basis must be within the Start/Stop times of the Parent Reservation.

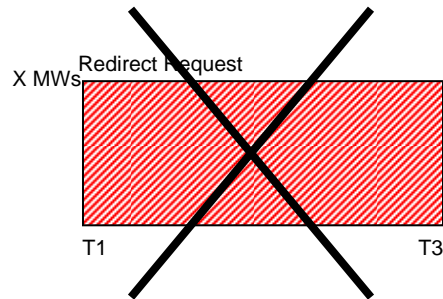
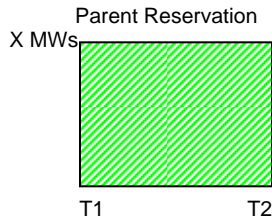
Valid Redirect



Valid Redirect



Invalid Redirect





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**For Quadrant: Wholesale Electric Quadrant**

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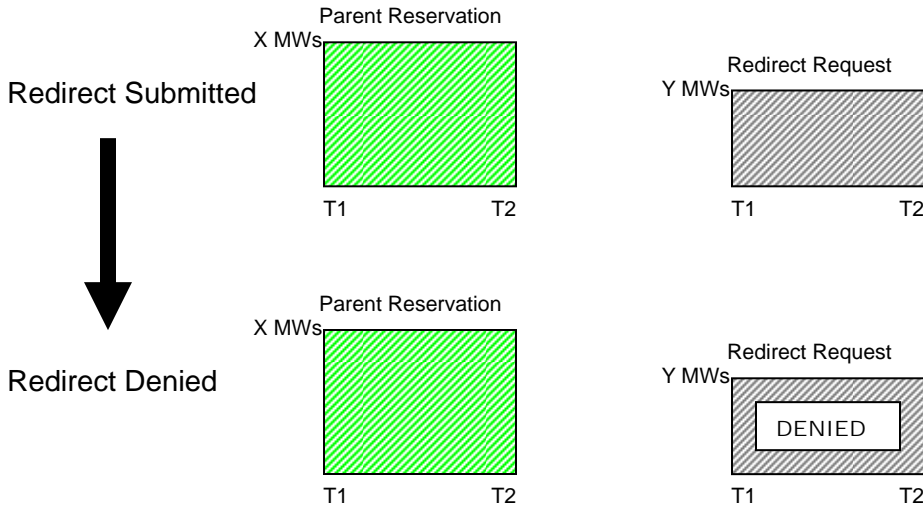
**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

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**Standard 9.4.1 and 10.4.1**

Capacity Available to Redirect on the Parent Reservation is not impacted by a denied request for Redirect on a Firm or Non-Firm basis.





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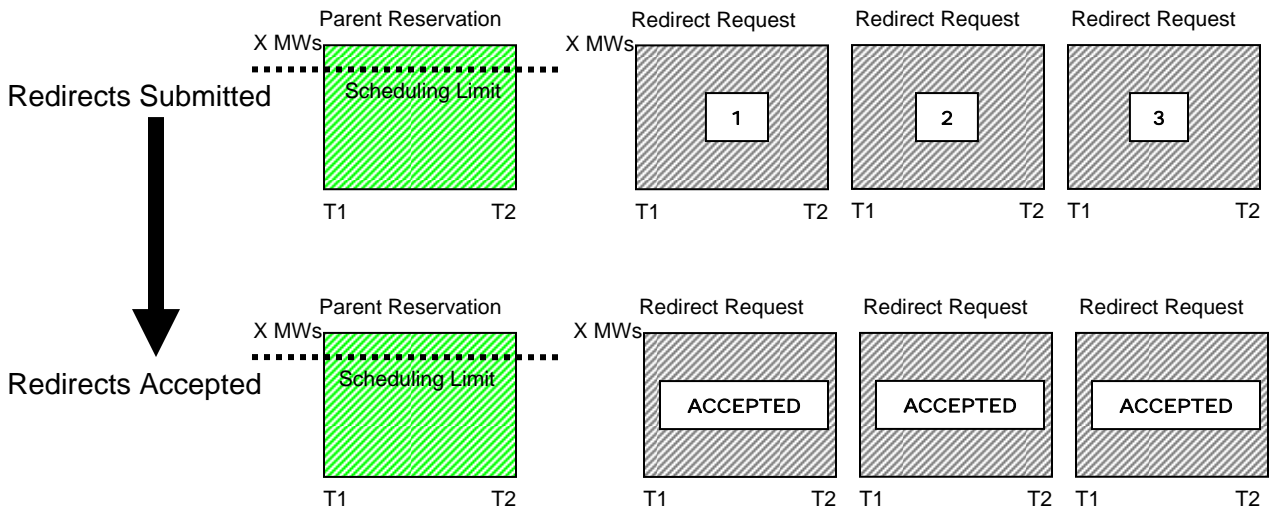
**Request No.:** R04006-C

**Request Title:** OASIS 1A Enhancements – Redirects

**Approved by the Executive Committee on November 16, 2004**

**Standard 9.4.2 and 10.4.2**

Multiple requests for Redirect on a Firm or Non-Firm basis may be submitted for the same Capacity Available to Redirect on the Parent Reservation.





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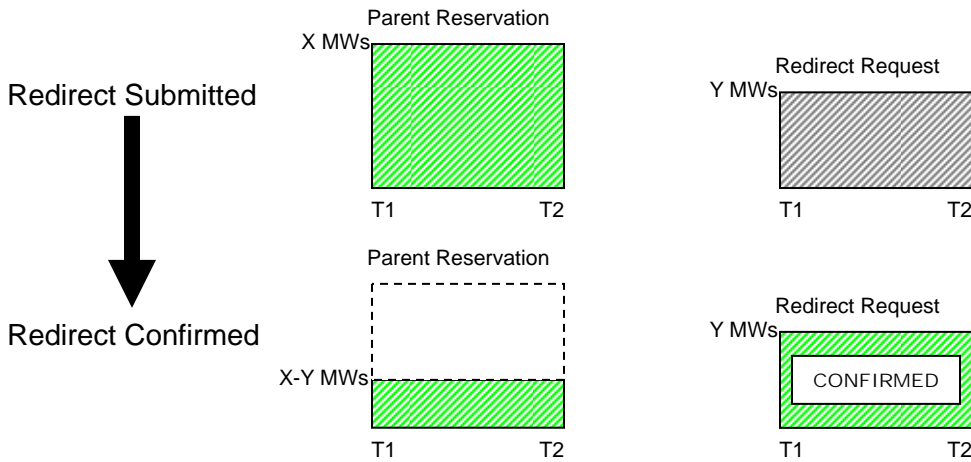
**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Approved by the Executive Committee on November 16, 2004**

**Standard 9.5 and 10.5**

Confirmation of requests for Redirect on a Firm or Non-Firm basis reduces the Capacity Available to Redirect on the Parent Reservation.







**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters: Electronic Scheduling Subcommittee and Information Technology Subcommittee**

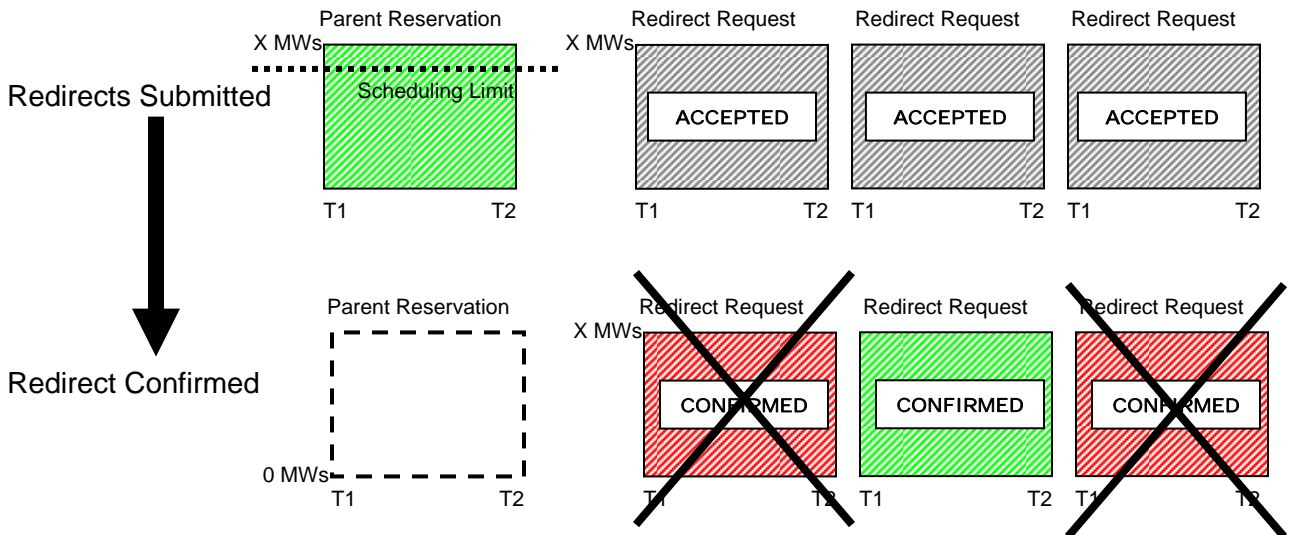
**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Approved by the Executive Committee on November 16, 2004**

**Standard 9.5.1 and 10.5.1**

Confirmation of requests for Redirect on a Firm or Non-Firm basis that exceed the remaining Capacity Available to Redirect on the Parent Reservation will be blocked.





**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
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**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Approved by the Executive Committee on November 16, 2004**

#### 4. SUPPORTING DOCUMENTATION

##### a. Description of Request:

Using OASIS to process and record redirects of transmission service is a difficult task. There are many issues related to the redirect and resale functionality, but most are caused by provider business rules or vendor design choices. The primary issue concerns redirects of transmission service. The current OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold (reassigned) transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as REDIRECTS, that use this resold or reassigned transmission service. This is only an issue when the 2nd customer wants to redirect transmission usage to a constrained path. Currently, unless the provider intervenes on the backend, that provider only has the option to deny this type of transaction when it is tagged.

##### b. Description of Recommendation:

The standard recommendation addresses the “primary issue” stated in the Standard Request: the business practices related to requests for a Redirect of transmission service on either a Firm or Non-Firm basis. The issue of the treatment of secondary market resale requests for redirected service are addressed in a separate Standard Recommendation specific to Resales.

The OASIS S&CP discusses redirection of service to alternate points of receipt and delivery in Section 4.2.13.9. This section did not explicitly state to whom such requests must be submitted. Redirected service requires an assessment of the transfer capability on the designated alternate points of receipt and/or delivery. Only the primary transmission provider is in a position to make such an assessment and authorize the redirected service under the OATT. Therefore, the OASIS S&CP is clarified in the recommended standard to explicitly require that all requests for redirected service must be submitted to the primary transmission provider for evaluation and approval. The recommended standard also addresses the settlement issue in the event that redirected service would increase or decrease the charges due to the transmission provider.

In support of the Recommendation Redirect of Transmission Service for a proposed business practice standard to the NAESB Executive Committee, please see the following sets of minutes:

WEQ OASIS 1A Task Force	February 13, 2004	<a href="http://www.naesb.org/pdf/weq_oasis1a_021304dm.pdf">http://www.naesb.org/pdf/weq_oasis1a_021304dm.pdf</a>
	July 14, 2004	<a href="http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc">http://www.gisb.org/pdf/weq_oasis1a_071404dm.doc</a>
WEQ ESS	February 17-18, 2004	<a href="http://www.naesb.org/pdf/weq_ess021704fm.doc">http://www.naesb.org/pdf/weq_ess021704fm.doc</a>
WEQ ESS/ ITS	April 6, 2004	<a href="http://www.naesb.org/pdf/weq_ess_its040604fm.doc">http://www.naesb.org/pdf/weq_ess_its040604fm.doc</a>
	May 26-27, 2004	<a href="http://www.naesb.org/pdf/weq_ess_its052604dm.doc">http://www.naesb.org/pdf/weq_ess_its052604dm.doc</a>
	July 28-29, 2004	<a href="http://www.gisb.org/pdf/weq_ess_its072804fm.doc">http://www.gisb.org/pdf/weq_ess_its072804fm.doc</a>



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
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**Requesters: Electronic Scheduling Subcommittee and  
Information Technology Subcommittee**

**Request No.: R04006-C**

**Request Title: OASIS 1A Enhancements – Redirects**

**Approved by the Executive Committee on November 16, 2004**

August 17, 2004 [http://www.gisb.org/pdf/weq\\_ess\\_its081704fm.doc](http://www.gisb.org/pdf/weq_ess_its081704fm.doc)

September 2, 2004 [http://www.gisb.org/pdf/weq\\_ess\\_its090204fm.doc](http://www.gisb.org/pdf/weq_ess_its090204fm.doc)

September 29-30,  
2004 [http://www.gisb.org/pdf/weq\\_ess\\_its092904dm.doc](http://www.gisb.org/pdf/weq_ess_its092904dm.doc)

October 6, 2004

October 8, 2004

**c. Business Purpose:**

The Business Practices will provide market participants with procedures for providing any necessary data for the Redirect of Transmission Service. The current WEQ OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as redirects, that use this resold or reassigned transmission usage to a constrained path.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**



## North American Energy Standards Board

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Home Page: [www.naesb.org](http://www.naesb.org)

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**via email**

**TO:** NAESB Wholesale Electric Quadrant Members  
**FROM:** Todd Oncken, Deputy Director  
**RE:** Member Ratification of Standards Adopted by the Wholesale Electric Quadrant of the Executive Committee  
**DATE:** December 1, 2004

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Please find the attached ballot to record your vote on the ratification of five recommendations approved by the Executive Committee on November 30, 2004. The draft minutes for this meeting and the recommendations are available on the NAESB web site. To record your vote, please fill out page two of this communication and either email ([naesb@naesb.org](mailto:naesb@naesb.org)) or fax it (713-356-0067) to our office by December 31, 2004. Should the recommendations be ratified, they will be available for use as final actions prior to publication of NAESB WEQ standards.

The EC voting record and discussion on these items is contained within the EC minutes of November 30, 2004. Links to the EC minutes, request, and related subcommittee and task force minutes can be found on the NAESB WEQ main page (<http://www.naesb.org/weq/default.asp>). The recommendations can be found on the Member Ratification of Standards and Board Actions page of the NAESB web site (<http://www.naesb.org/ratification.asp>), and links to the recommendations are also provided in the ballot itself. Transcripts of the EC meeting where these recommendations were discussed can be ordered by calling the NAESB office – 713-356-0060.

Please feel free to call the NAESB office if you have any difficulty retrieving any of this information.

Best Regards,

*Todd Oncken*

cc: Rae McQuade, Executive Director

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# North American Energy Standards Board

1301 Fannin, Suite 2350, Houston, Texas 77002  
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Home Page: [www.naesb.org](http://www.naesb.org)

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**NAESB Membership Ratification Ballot for Wholesale Electric Quadrant Standards  
Due December 31, 2004  
To NAESB Office (Fax Number 713-356-0067, email [naesb@naesb.org](mailto:naesb@naesb.org))**

Please vote in favor of or in opposition to the Executive Committee (EC) action taken on November 30, 2004:

Support	Oppose	Action:
		<b>Recommendation R04013 (Version 0 Business Practice Standards) - Time Error Correction Business Practices:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a5.doc">http://www.naesb.org/protected/rat_weq120104a5.doc</a>
		<b>Recommendation R04013 (Version 0 Business Practice Standards) - Inadvertent Interchange Business Practices:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a4.doc">http://www.naesb.org/protected/rat_weq120104a4.doc</a>
		<b>Recommendation R04013 (Version 0 Business Practice Standards) - Area Control Error Equation Special Cases Business Practices:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a2.doc">http://www.naesb.org/protected/rat_weq120104a2.doc</a>
		<b>Recommendation R04013 (Version 0 Business Practice Standards) - Coordinate Interchange Business Practices:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a3.doc">http://www.naesb.org/protected/rat_weq120104a3.doc</a>
		<b>Recommendation R04013 (Version 0 Business Practice Standards) - Transmission Loading Relief:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a6.doc">http://www.naesb.org/protected/rat_weq120104a6.doc</a>

Member Name:	_____
Member Signature:	_____
Member Company:	_____
Segment:	_____
Date:	_____



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Home Page: [www.naesb.org](http://www.naesb.org)

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## NAESB Wholesale Electric Quadrant Members as of November 30, 2004

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<b>NAESB WEQ Member</b>	<b>Member Contact</b>
ACES Power Marketing LLC	Roy J. True
Alabama Electric Cooperative, Inc.	Kenneth J. Skroback
American Electric Power Service Corp.	Thomas Ringenbach
American Electric Power Service Corp.	Barbara Radous
American Electric Power Service Corp.	Joseph Hartsoe
American Electric Power Service Corp.	John Stough
American Electric Power Service Corp.	Michael Desselle
American Municipal Power - Ohio, Inc.	Pat Frazier
American Municipal Power - Ohio, Inc.	Chris Norton
American Transmission Company LLC	Julie Voeck
Arizona Public Service Company	Mark W. Hackney
Arkansas Electric Cooperative Corporation	Ricky Bittle
Avista Corp.	Scott A. Waples
Basin Electric Power Cooperative	Jason Doerr
Basin Electric Power Cooperative	David Raatz
Basin Electric Power Cooperative	Dan Klempel
Boeing Company, The	Steve LaFond
Bonneville Power Administration	Sydney D. Berwager
Bonneville Power Administration	Francis Halpin
Bonneville Power Administration	Brenda Anderson
Bonneville Power Administration	Barbara Rehman
BP America Inc.	Jeanne Zaiontz
Buckeye Power, Inc.	Peter H. Buros
Calpine Corporation	William Taylor
Calpine Corporation	Jim Stanton
Cap Gemini Ernst and Young	Stephen A. Behrens
Central Electric Power Cooperative	Arthur Fusco
ChevronTexaco Energy Research and Technology	Carol Guthrie
Cinergy	Ron Jackups
Cinergy	Walt Yeager
Cinergy	Ron Jackups
Cinergy	Walt Yeager
Cinergy	Ron Jackups
Cleco Power, LLC	Keith Comeaux
Columbus Southern Power Company	Phil Cox
Comprehensive Energy Services	Jim Templeton
Conectiv Energy Supply, Inc.	Gloria Ogenyi
Conectiv Energy Supply, Inc.	Gloria Ogenyi
Conectiv Power Delivery	Ken Gates
Constellation NewEnergy, Inc.	Sara O'Neill
Consumers Energy Company	Andrew C. Dotterweich
Consumers Energy Company	Frank Johnson
Consumers Energy Company	Steven L. Gaarde
Consumers Energy Company	Andrew C. Dotterweich
Consumers Energy Company	John J. Dellas
Dairyland Power Cooperative	Chuck Callies
Department of the Interior, US Bureau of Reclamation	Deborah M. Linke
Dominion Energy Marketing, Inc.	Louis Oberski
Duke Energy Corp.	Ollie Frazier
Duke Energy North America	Bill D. Blevins
Dynegy Power Marketing, Inc.	Barry Huddleston
Edison Electric Institute	David Owens
Edison Electric Institute	Dave Dworzak

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<b>NAESB WEQ Member</b>	<b>Member Contact</b>
Electric Reliability Council of Texas (ERCOT)	Sam R. Jones Ray Giuliani Gregory Locke
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Oglethorpe Power Corporation Ohio Consumers Council Old Dominion Electric Cooperative Ontario Power Generation Ontario Power Generation Open Access Technology International, Inc. PacifiCorp PacifiCorp	

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# North American Energy Standards Board

1301 Fannin, Suite 2350, Houston, Texas 77002

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## NAESB WEQ Member

Xcel Energy Inc.  
ACES Power Marketing LLC

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## Member Contact

Steven J. Beuning  
Roy J. True

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**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE**  
**For Quadrant: Wholesale Electric Quadrant**

**Requesters:** Business Practices Subcommittee  
**Request No.:** R04013  
**Request Title:** Version 0 Business Practices Standards

**Revised by the WEQ Executive Committee on November 30, 2004**

**1. RECOMMENDED ACTION:**

Accept as requested  
 Accept as modified below  
 Decline

**EFFECT OF EC VOTE TO ACCEPT  
RECOMMENDED ACTION:**

Change to Existing Practice  
 Status Quo

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

**Per Request:**

Initiation  
 Modification  
 Interpretation  
 Withdrawal  
  
 Principle  
 Definition  
 Business Practice Standard  
 Document  
 Data Element  
 Code Value  
 X12 Implementation Guide  
 Business Process Documentation

**Per Recommendation:**

Initiation  
 Modification  
 Interpretation  
 Withdrawal  
  
 Principle  
 Definition  
 Business Practice Standard  
 Document  
 Data Element  
 Code Value  
 X12 Implementation Guide  
 Business Process Documentation

**3. RECOMMENDATION**

**SUMMARY:** Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. The NAESB Version 0 Business Practice Standards implement existing business practices as they reside in NERC's current reliability operating policies and planning standards. There are five Business Practices Standards: Time Error Correction, Inadvertent Interchange, Area Control Error Equation Special Cases, Coordinate Interchange, and Transmission Loading Relief.

**RECOMMENDED STANDARDS:**

See Attachments.



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: Business Practices Subcommittee  
Request No.: R04013  
Request Title: Version 0 Business Practices Standards**

**Revised by the WEQ Executive Committee on November 30, 2004**

#### **4. SUPPORTING DOCUMENTATION**

**a. Description of Request:**

Sections of NERC's existing operating policies and planning standards that contained business practices were identified as suitable for incorporation as NAESB Version 0 Business Practice Standards. These complementary business practice standards are integral to the operation and enforceability of NERC's reliability standards. The collaborative effort with NERC to prepare a Version 0 foundation of business practices will serve as a cornerstone for future NAESB business practice standards development.

**b. Description of Recommendation:**

Adopt standards as recommended.

**c. Business Purpose:**

Adopt Version 0 Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation.

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

Discussion on this recommendation can be found in the following minutes:

WEQ BPS	May 11, 2004	<a href="http://www.naesb.org/pdf/weq_bps051104fm.doc">http://www.naesb.org/pdf/weq_bps051104fm.doc</a>
WEQ BPS	June 2-3, 2004	<a href="http://www.naesb.org/pdf/weq_bps060204fm.doc">http://www.naesb.org/pdf/weq_bps060204fm.doc</a>
WEQ BPS	June 17-18, 2004	<a href="http://www.naesb.org/pdf/weq_bps061704fm.doc">http://www.naesb.org/pdf/weq_bps061704fm.doc</a>
WEQ BPS	June 29, 2004	<a href="http://www.naesb.org/pdf/weq_bps062904fm.doc">http://www.naesb.org/pdf/weq_bps062904fm.doc</a>
WEQ BPS	July 7-8, 2004	<a href="http://www.naesb.org/pdf/weq_bps070704fm.doc">http://www.naesb.org/pdf/weq_bps070704fm.doc</a>
WEQ BPS	August 10-11, 2004	<a href="http://www.naesb.org/pdf/weq_bps081004fm.doc">http://www.naesb.org/pdf/weq_bps081004fm.doc</a>
WEQ BPS	August 31, 2004	<a href="http://www.naesb.org/pdf/weq_bps083104fm.doc">http://www.naesb.org/pdf/weq_bps083104fm.doc</a>



**RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE  
For Quadrant: Wholesale Electric Quadrant**

**Requesters: Business Practices Subcommittee  
Request No.: R04013  
Request Title: Version 0 Business Practices Standards**

**Revised by the WEQ Executive Committee on November 30, 2004**

WEQ BPS	September 2, 2004	<a href="http://www.naesb.org/pdf/weq_bps090204fm.doc">http://www.naesb.org/pdf/weq_bps090204fm.doc</a>
WEQ BPS	October 12-13, 2004	<a href="http://www.naesb.org/pdf/weq_bps101204fm.doc">http://www.naesb.org/pdf/weq_bps101204fm.doc</a>
WEQ BPS	October 22, 2004	

Standard #: WEQBPS-003-000

# Area Control Error (ACE) Equation Special Cases

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## Purpose

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10 It is the obligation of each Balancing Authority to manage its Area Control Error in accordance with NERC reliability standards. This Standard provides additional requirements of Jointly Owned Units, Supplemental Regulation Service and Load or Generation Transfer by Telemetry for the ACE equation.

## Applicability:

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Balancing Authorities

15

Effective Date: [date]

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## Definitions:

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20 **Area Control Error (ACE)** - The instantaneous difference between net actual and scheduled interchange, taking into account the effects of frequency bias including a correction for meter error.

25 **Balancing Authority (BA)** – The entity responsible for integrating resource plans ahead of time, for maintaining load-interchange-generation balance within a Balancing Authority Area, and for supporting Interconnection frequency in real time.

30 **Balancing Authority Area** - An electrical system bounded by interconnection (tie-line) metering and telemetry, where the Balancing Authority controls (either directly or by contract) generation to maintain its Interchange Schedule with other Balancing Authority Areas and contributes to frequency regulation of the Interconnection.

35 **Dynamic Schedule** - A telemetered reading or value that is updated in real time and used as a schedule in the ACE equation and the integrated value of which is treated as a schedule for interchange accounting purposes. Commonly used for “scheduling” jointly owned generation to or from another Balancing Authority Area.

**Interchange Schedule** - The planned energy exchange between two adjacent Balancing Authorities.

40

**Interconnection** – Any one of the three major electric system networks in North America: Eastern, Western, and ERCOT.

45

**Jointly Owned Units (JOU[s])** - This term refers to a unit in which two or more entities share ownership.

**Net Actual Interchange (NI<sub>a</sub>)** - The algebraic sum of all metered interchange over all interconnections between two physically adjacent Balancing Authority Areas.

50

**Net Interchange Schedule (NI<sub>s</sub>)** - The algebraic sum of all Interchange Schedules with each adjacent Balancing Authority Area.

**Pseudo-Tie** - A telemetered reading or value that is updated in real time and used as a tie line flow in the ACE equation but for which no physical tie or energy metering actually exists. The integrated value is used as a metered MWh value for interchange accounting purposes.

55

**Supplemental Regulation Service** - A method of providing regulation service in which the Balancing Authority providing the regulation service receives a signal representing all or a portion of the other Balancing Authority's ACE.

60

## **Business Practices Requirements**

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### **1. Jointly Owned Units**

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65

Jointly Owned Units should be accounted for properly by all owners in the Area Control Error Equation.

1.1. ACE equation for each Balancing Authority should reflect its ownership of the JOUs both internal and external to its Balancing Authority area.

70

1.2. If fixed Schedules are not used, JOUs may be handled as a Pseudo-Tie or a Dynamic Schedule.

#### **1.2.1. Pseudo-Ties**

75

If the JOUs are considered Pseudo-Ties then the NI<sub>s</sub> remains Net Interchange Schedule and the NI<sub>A</sub> term should become NI<sub>a</sub> – I<sub>AJOUE</sub> – I<sub>AJOUI</sub> where:

80

NI<sub>a</sub> = Net Actual Interchange.

I<sub>AJOUE</sub> = Pseudo-Tie for JOU external to a Balancing Authority.

$I_{AJOUE}$  is assumed negative for external generation coming into the Balancing Authority as a Pseudo-Tie.

85

$I_{AJOUI}$  = Pseudo-Tie for JOU internal to a Balancing Authority.

Incoming power is negative.  
Outgoing power is positive.

90

### 1.2.2. Dynamic Schedule

If the JOU is reflected as a Dynamic Schedule, the  $NI_a$  remains actual tie flows and the  $NI_s$  should become  $NI_s + I_{SJOUE} + I_{SJOUI}$ .

95

$NI_s$  = Net Interchange Schedule.

$I_{SJOUE}$  = Dynamic Schedule for the JOU external to a Balancing Authority Area.

100

$I_{SJOUE}$  is assumed negative for external generation coming into the Balancing Authority as a Dynamic Schedule.

$I_{SJOUI}$  = Dynamic Schedule for the JOU internal to a Balancing Authority.

105

Incoming power is negative.  
Outgoing power is positive.

110 Appendix A of this Business Practice Standard illustrates how JOUs can be accounted for in the ACE equation either as a Pseudo-Tie or as a Dynamic Schedule.

## 2. Supplemental Regulation Service

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115

Supplemental Regulation Service is required when one Balancing Authority takes over all or part of the regulation requirements of another Balancing Authority without incorporating its ties and schedules. In this case, both Balancing Authorities shall handle this in a consistent manner as a Dynamic Schedule

120

2.1. Both Balancing Authorities shall add another component,  $I_{SC}$  (term for Supplemental Regulation Service Component) to both Balancing Authorities' ACE with the proper sign convention.

125

2.1.1. Assume Balancing Authority X is purchasing regulation service from Balancing Authority Y.

2.1.1.1. For Balancing Authority X,  $I_{SC}$  shall be subtracted from Balancing Authority X's ACE for over-generation and added for under-generation.

130

2.1.1.2. For Balancing Authority Y,  $I_{SC}$  shall be added to Balancing Authority Y's ACE for X's over-generation and subtracted for X's under-generation

135

### **3. Load or Generation Transfer By Telemetry**

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Dynamic scheduling may also be used for telemetered transfer of load or generation from one Balancing Authority to another.

140

3.1 If dynamic scheduling is used to transfer load or generation by telemetry, both Balancing Authorities shall modify their ACE equation as applicable.

145

3.1.1 To transfer load, the Balancing Authority giving up the transferred load shall add the load  $I_{SL}$  (term for transferred load) to its ACE equation.

3.1.2 The Balancing Authority accepting the load shall subtract  $I_{SL}$  the transferred load from its ACE equation.

150

3.1.3 For generation, the Balancing Authority giving up generation shall subtract  $I_{SG}$  (term for transferred generation) and the Balancing Authority accepting the generation shall add  $I_{SG}$  to its ACE equation.



## Appendix A

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155

### Examples of Accounting of Jointly Owned Units as Pseudo-Tie or Dynamic Schedule

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The following examples illustrate the methodology of accounting JOUs as Pseudo-Tie or Dynamic Schedule.

165

Balancing Authority X and Balancing Authority Y each have a unit in their Balancing Authority Area jointly owned by both Balancing Authorities. Unit 1 is in Balancing Authority X and unit 2 is in Balancing Authority Y. The ACE equation for Balancing Authority X should reflect its ownership of both units. Two components are required: one to reflect X's ownership in unit 2 and one to reflect Y's ownership of unit 1. Balancing Authority Y's ACE equation should likewise have two components, one for its ownership in unit 1 and one for X's ownership of unit 2.

170

Assume Unit 1 in Balancing Authority X is generating 400 MW.  
100 MW owned by X  
300 MW owned by Y

175

Assume Unit 2 in Balancing Authority Y is generating 300 MW.  
50 MW owned by X  
250 MW owned by Y

#### Pseudo-Tie

180

Representing the units as a Pseudo-Tie the equations become:

For Balancing Authority X:  $NI_A = NI_a - (-50) - 300$

For Balancing Authority Y:  $NI_A = NI_a - (-300) - 50$

185

#### Dynamic Schedule

Representing the unit as a Dynamic Schedule the equations become:

190

For Balancing Authority X:  $NI_S = NI_s - 50 + 300$

For Balancing Authority Y:  $NI_S = NI_s - 300 + 50$

5 Standard #: WEQBPS – 002-000

# Coordinate Interchange

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## **Purpose:**

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10 The purpose of this standard is to define procedures for market participants to request the implementation of Interchange Transactions.

## **Applicability:**

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This Standard applies to:

15 Purchasing Selling Entity, Balancing Authority, Reliability Coordinator, Load Serving Entity, Market Operator, Transmission Service Provider, Scheduling Agent.

## **Effective Date: [date]**

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## **Definitions:**

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20 **Approval Entity** – An entity that has approval rights for an Interchange Transaction Tag. This includes the Transmission Service Providers (TSP), Balancing Authorities (BA), Purchasing-Selling Entities (PSE), and Load Serving Entities (LSE) involved in the Interchange Transaction.

25 **Balancing Authority (BA)** – The entity responsible for integrating resource plans ahead of time, for maintaining load-interchange-generation balance within a Balancing Authority Area, and for supporting Interconnection frequency in real time.

30 **Balancing Authority Area** - An electrical system bounded by interconnection (tie-line) metering and telemetry, where the Balancing Authority controls (either directly or by contract) generation to maintain its Interchange Schedule with other Balancing Authority Areas and contributes to frequency regulation of the Interconnection.

35 **Checkout Process** – The method by which any two entities in the utility industry routinely perform a confirmation of schedules for a period of time.

**Interchange Block Accounting** – Energy accounting that assumes a beginning and ending ramp time of zero minutes. For accounting purposes, this moves the energy associated with the starting and ending ramps into the adjacent starting and ending clock time of the Interchange.

40 **Interchange Transaction** - An agreement to transfer energy from a seller to a buyer that crosses one or more Balancing Authority boundaries.

45 **Interchange Transaction Tag (Tag)** – An Interchange Transaction being submitted for implementation according to Version 1.7.095 NERC Transaction Information Systems Working Group (TISWG) *Electronic Tagging Functional Specification*

**Interconnection** – Any one of the three major electric system networks in North America: Eastern, Western, and ERCOT.

50 **Load-Serving Entity (LSE)** – Secures energy and transmission service (and related interconnected operations services) to serve the electrical demand and energy requirements of its end-use customers.

55 **Market Operator** – An entity that administers a market that integrates capacity, energy, balancing resources, and transmission resources to achieve an economic, reliability-constrained dispatch of resources.

60 **Market Period** – The period of time beginning when a Requesting PSE is making purchase, sale, and transmission service arrangements needed to support an Interchange Transaction Tag through the time when the Sink BA (Tag Authority) receives the Market Period approvals.

65 **Purchasing-Selling Entity (PSE)** – The entity that purchases or sells and takes title to energy capacity and interconnected operations services. PSE's may be affiliated or unaffiliated merchants and may and may not own generating facilities.

**Reliability Coordinator (RC)** - An entity that provides the security assessment and emergency operations coordination for a group of Balancing Authorities, Transmission Service Providers, and Transmission Operators..

70 **Reliability Period** – The segment of time beginning with the Sink BA requesting approvals from the reliability Approval Entities until the completion of the physical flow of the energy associated with an Interchange Transaction Tag.

75 **Requesting PSE** – The PSE submitting the Interchange Transaction Tag.

**Scheduling Agent** – Entity that is physically scheduling interchange on behalf of the Transmission Service Provider in order to provide wheeling services. Typically this is the Balancing Authority for the Transmission Service Provider, but may be several Balancing Authorities supporting a regional transmission service.

80 **Sink BA** – The Balancing Authority in which the load (Sink) is located for an Interchange Transaction. (This will also be a receiving balancing authority for the resulting Interchange Schedule).

85 **Source BA** – The Balancing Authority in which the generation (source) is located for an Interchange Transaction. (This will also be a sending balancing authority for the resulting Interchange Schedule).

90 **Transmission Service Provider (TSP)** – The entity that administers the transmission tariff and provides transmission services to qualified market participants under applicable transmission service agreements.

## **Business Practices Requirements**

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95 1. All requests to implement bilateral Interchange Transactions, and certain Interchange Schedules, shall be accomplished by the submission of a completed Interchange Transaction Tag to the Sink BA.

100 1.1. Interchange Transaction Tags for Interchange Transactions crossing Interconnections shall be in accordance with **Appendix A “Interchange Transaction Tagging Between Interconnections”**.

105 1.2. In the event of E-Tag system component failure, the requirements and procedures contained within **Appendix B “Electronic Tagging Service Performance Requirements and Failure Procedures”** shall be followed

110 1.3. It shall be the responsibility of the load serving Purchasing-Selling-Entity (PSE), or their designee, to ensure the completed Interchange Transaction Tag has been submitted to the Sink BA and that the Interchange Transaction Tag contains all reliability required information specified in NERC Version 0 Standard INT-001-0, Attachment 1-INT-001-0.

115 1.4. Approval Entities shall only be allowed to take actions against Interchange Transaction Tags as specified in **Appendix C “Interchange Transaction Tag Actions”**.

120 1.5. A completed Interchange Transaction Tag shall contain, at a minimum, the information specified in Appendix D **“Required and Correctable Interchange Transaction Tag Data”**.

125 1.6. The completed Interchange Transaction Tag shall be submitted to the Sink BA in accordance with the timing requirements contained in NERC Version 0 Standard INT-001-0, Attachment 1-INT-001-0.

130 2. All energy purchase, energy sale, and transmission service arrangements necessary to create the Interchange Transaction Tag and implement the bilateral Interchange Transaction shall be performed and verified by the Requesting PSE prior to the Interchange Transaction Tag being submitted to the Sink BA.

135 2.1 The Requesting PSE shall have the right to delegate this responsibility to the Market Operator.

- 135 3. The completed Interchange Transaction Tag, including all updates and market modifications, shall be forwarded by the Sink BA to the appropriate Approval Entity(s) for a Market Period assessment.
- 3.1. In addition to those entities specified by NERC standards, PSEs providing generation and LSEs shall have approval rights.
- 140 4. The results of the Market Period assessment (approval or denial) by the Approval Entities shall be promptly communicated back to the Sink BA. The Sink BA shall notify the Requesting PSE, and to all other involved parties, the results of the assessment.
- 145 4.1. Unless denied by an Approval Entity, the Interchange Transaction is considered approved when all involved parties receive from the Sink BA the results of each Approval Entity’s assessment.
- 4.2. All denials of an Interchange Transaction Tag by any Approval Entity shall be accompanied by the reason for such denial.
- 150 5. Any changes to the status of an Interchange Transaction Tag during the Market Period assessment shall be communicated by the requesting PSE to the Sink BA.
- 155 6. The preferred method of submitting the Interchange Transaction Tag to the Sink BA shall be electronic and in accordance with the Version 1.7.095 NERC Transaction Information Systems Working Group (TISWG) *Electronic Tagging Functional Specification*
- 6.1. A backup or redundant electronic system shall be available for immediate use should the primary electronic means become disabled.
- 160 6.2. Submitting an Interchange Transaction Tag to the Sink BA via facsimile is acceptable only as a last resort when the electronic means and its required backup or redundant system are not available.
- 165 7. Interchange Transaction Tag corrections for non-reliability related data shall be allowed prior to the Interchange Transaction Tag’s approval/denial by the Approval Entities.
- 7.1. Timing for market related corrections shall be in accordance with NERC Version 0 Standard INT-004-0, Attachment 1-INT-004-0.
- 170 8. The Requesting PSE shall have the right to modify an Interchange Transaction that is in progress or scheduled to be started. Modifications may include changes in contracts, economic decisions, or other market-based influences.
- 175 8.1. Interchange Transaction Tag modifications made to the “Implemented” Interchange Transaction Tag or its committed transmission reservation for market-related issues by the Requesting PSE, or its designee, must be submitted to the Sink BA and all affected parties within the time requirements of NERC Version 0 Standard INT-004-0, Attachment 1-INT-004-0.

- 180 8.2. The Requesting PSE shall have the right to increase or decrease the Interchange  
Transaction Tag's energy and committed transmission(s) profile to reflect a desire to  
flow more or less energy or commit more or less transmission than originally requested.  
In the case of an increase, the Requesting PSE must provide the necessary transmission  
185 capacity which must be approved by all Approval Entities.
- 185 8.3. The Requesting PSE shall have the right to extend the Interchange Transaction Tag's  
energy profile to reflect a desire to flow energy during hours not previously specified.  
The Requesting PSE must provide the necessary transmission capacity which must be  
190 approved by all Approval Entities.
- 190 9. All parties involved in an Interchange Transaction shall have, or arrange to have, personnel  
and facilities on site and immediately available for notification of changes to the Interchange  
Transaction Tag from the beginning of the Market Period until the time when the energy  
195 flow of the Transaction has been completed.
- 195 10. Unless provided for under a FERC approved market mechanism, energy accounting for all  
Interchange Transactions shall be accomplished via Interchange Block Accounting.
- 200 11. Settlement of losses shall be either handled as financial or as payment in-kind in accordance  
with the Transmission Service Provider tariff.
- 205 11.1. For losses handled as payment in-kind, the Requesting PSE, or its designee, shall  
communicate to the Sink BA, via an Interchange Transaction Tag (either the original or  
a separate Interchange Transaction Tag), the MW losses and the entity the losses are  
with for each TSP/BA along the Interchange path.
- 210 12. All RAs, BAs, TSPs, PSEs, and other entities involved in an Interchange Transaction shall  
not disclose the Interchange Transaction information to any PSE not involved in the  
Interchange Transaction.
- 210 13. After a curtailment of an Interchange Transaction Tag has ended, the Sink BA shall return  
the Interchange Transaction Tag profile to the originally requested level, unless otherwise  
specified by the entity submitting the Interchange Transaction Tag.

## Appendix A

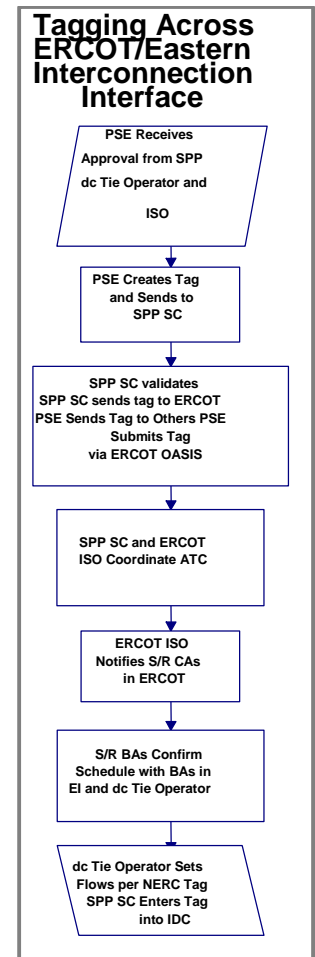
### 215 Interchange Transaction Tagging Between Interconnections

#### A. Between ERCOT and Eastern Interconnections

220 A Purchasing-Selling Entity that is seeking transmission arrangements to  
 coordinate through the SPP Reliability Coordinator. Requests for service  
 must be made to the SPP Reliability Coordinator for service into or through  
 SPP (including service across either the North or East DC Ties) via the SPP  
 OASIS. Request for service must also be made in ERCOT via the ERCOT  
 OASIS. The SPP Reliability Coordinator will coordinate approval of  
 225 reservations and schedules involving the SPP portion of transmission service  
 (including the DC ties) and service in ERCOT.

The following procedures are followed when scheduling transmission service  
 between SPP and ERCOT:

- 230 • The Purchasing-Selling Entity must receive approval for DC tie service and  
 transmission service in SPP from the SPP Reliability Coordinator for the  
 proposed transaction and arrange required ancillary services.
- For all transmission service requests, the Purchasing-Selling Entity will create a  
 NERC Interchange Transaction Tag (known as the Tag) and submit it to the  
 SPP Reliability Coordinator. The SPP Reliability Coordinator will validate  
 235 certain information on the and check that a reservation exists before approving  
 the Tag. The approved Tag will be available to the parties to the transaction and  
 the ERCOT ISO.
- Simultaneous with submitting requests using the Interchange Transaction Tag to  
 the SPP Reliability Coordinator (for next hour, non-firm and all other  
 transmission service requests), the Purchasing-Selling Entity submits requests to  
 240 the ERCOT ISO via the ERCOT OASIS. The MW profile information  
 submitted to ERCOT must exactly match the information on the NERC Tag  
 supplied to ERCOT by the SPP Reliability Coordinator. (See note.)
- The SPP Reliability Coordinator coordinates approval of the transaction if ATC is available in SPP  
 and across the DC tie and works with the ERCOT ISO to coordinate ATC calculations in ERCOT-
- 245 • The ERCOT RC notifies the delivering/receiving ERCOT BA of the approved transaction and  
 provides a copy of the Interchange Transaction Tag and ERCOT schedule request.
- The delivering/receiving ERCOT Balancing Authority communicates with the delivering/receiving  
 control area outside of ERCOT, confirms the transaction/schedule, and confirms with the DC tie  
 operator.
- 250 • The DC tie operator will follow the Interchange Transaction Tag when setting flows across the tie.



Note: In ERCOT, there are two types of wholesale transmission services—planned and unplanned. Planned Transmission Service is service for nominated generating resources to specified loads. All other transmission service is unplanned.

- The SPP Reliability Coordinator will use the Interchange Transaction Tag to populate the IDC and to determine constrained facility ATC in the operating horizon.
- ERCOT ISO requires transactions/schedules involving use of the DC ties to include the Interchange Transaction Tag reference in the comments field on the ERCOT schedule request.

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## **B. Between Western and Eastern Interconnections**

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- All Interchange Transactions that cross the Interconnection Boundary, including next hour and same day service, will be submitted in E-Tag for inclusion in the Eastern Interconnection IDC.

### ***Interchange Transaction where the sink is in the Eastern Interconnection***

- The Purchasing-Selling Entity serving the load shall be responsible for submitting the E-Tag. The Purchasing-Selling Entity responsible for submitting the E-Tag will be required to submit the E-Tag in accordance with the time requirements in NERC Standard INT-001-0, Attachment 1-INT-001-0.
- The Transmission Service Providers and Balancing Authorities responsible for assessing the E-Tag will be required to assess the E-Tag in accordance with the time requirements in NERC Standard INT-001-0, Attachment 1-INT-001-0.

### ***Interchange Transaction where the Sink is in the Western Interconnection***

- The Purchasing-Selling Entity serving the load shall be responsible for submitting the E-tag.
- For Hourly/Multi-Hour Same Day Transactions, the sink Purchasing-Selling Entity in the Eastern Interconnection (last PSE before the DC Tie) shall be responsible for submitting the E-Tag.
- The Purchasing-Selling Entity responsible for submitting the E-Tag will be required to submit the E-Tag in accordance with the time requirements in NERC Standard INT-001-0, Attachment 1-INT-001-0.

The Transmission Service Providers and Balancing Authorities responsible for assessing the E-Tag will be required to assess the E-Tag in accordance with the time requirements in NERC's Version 0, Attachment 010-1, Subsection B – Western Interconnection



## Appendix B

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### Electronic Tagging Service Performance Requirements and Failure Procedures

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This document describes the performance requirements of the E-Tag System and the procedures to be followed in the event of an E-Tag System component’s failure. Due to the importance of accurate information flow, these procedures and requirements have been developed to ensure that reliable data communications remain available at all times.

#### A. Performance Requirements

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##### *Tag Agent Service Requirements*

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Entities that are required to use Tag Agent Services are responsible for providing a Tag Agent Service with which to conduct business; there are no exemptions to this requirement. There is no specific requirement against which performance should be measured. However, in cases of Tag Agent Service failure, non-receipt of critical information (such as curtailment notifications, transaction denials, and schedule modifications) due to performance problems shall be the responsibility of the Tag Agent User.

305

While it is acceptable for an entity to contract with a third-party to provide for this requirement, it should be understood that the Tag Agent User is ultimately responsible for the provision of the service. The non-performance of a third party does not excuse the entity from the obligation to provide the service.

##### *Tag Approval Services*

310

Entities that are required to employ Tag Approval Services are responsible for providing a Tag Approval Service as well as providing a level of redundancy; there are no exemptions from this requirement. At a minimum, Tag Approval Services may not have greater than 1.0% of the tags sent to their system within a calendar month be recorded by Tag Authority Services as having a state of “COMM\_FAIL.” While there is no specific level of redundancy that is required by this Appendix, sufficient redundancy must be in place that the entity is confident of achieving this standard.

315

While it is acceptable for an entity to contract with a third-party to provide for this requirement, it should be understood that the entity required to employ the Tag Approval Service is ultimately responsible for the provision of the service. The non-performance of a third party does not excuse the entity from the obligation to provide the service.

320

In order to monitor compliance with this requirement, the Balancing Authorities will arrange with their Authority Services to generate compliance reports at the beginning of each month determining this metric for the previous month on a Provider-by-Provider basis. These results should be available for investigation of any violations and the results of this investigation may be posted once finalized.

325

## ***Tag Authority Services***

As the Tag Authority Service is the most critical element of the E-Tag System, it must meet much higher standards. These standards can be divided into two areas: Implementation, and Policies and Performance.

### 330 ***Implementation***

Tag Authorities Services must be implemented in a manner that provides for redundancy and fault-tolerance through hardware and software; there are no exemptions to this requirement. Specifically, a Tag Authority Service must provide, at a minimum, the following:

- 335 • Two or more connections to the Internet, which may either be available concurrently or be switchable on demand (within five minutes);
- Redundant/Fault-Tolerant Networking Equipment between the Internet providers' demarcation points and the Computer Systems, as well as between each of the components of the system required to be inter-networked to provide functionality (i.e., FDDI Rings, dual homing, etc...);
- 340 • Redundant/Fault-Tolerant Computer Systems that can immediately recover from a loss of any single component (i.e., mirrored databases, web clusters, etc...).

Providers of Tag Authority Services may be required to provide documented explanations of how they meet or exceed the above requirements. These documents may be evaluated for fitness and will be held in confidence.

### 345 ***Policies and Performance***

The following shall be required of all Tag Authority Services:

- All scheduled outages must be performed between the hours of 01:00 CST and 04:00 CST. Any maintenance that must be performed outside this three hour window must be accomplished through the use of redundant systems in such a manner that no outage is visible;
- 350 • Notice of Scheduled outages must be given to the public at least 24 hours before the outage is to occur. Notice shall be deemed valid if the following actions have been taken:
  1. Users of the system are sent notifications, via Email or a proprietary system, time stamped at least 24 hours prior to the outage;
  - 355 2. The TISFORUM mailing list is sent Email notification time stamped at least 24 hours prior to the outage;
  3. The OASIS TSIN mailing list is sent Email notification time stamped at least 24 hours prior to the outage.

Any system problem that creates behavior contrary to that described in the E-Tag Specification shall constitute an "Unscheduled Outage." For example, a system that begins rejecting every third message it receives due to a component failure in a cluster would constitute an

360

Unscheduled Outage (although the system was only failing one third of the time, it was not performing as described in the E-Tag specification).

365 Tag Authority Services may not be in a state of Scheduled or Unscheduled outage for more than 0.5% of the time for the month, based on outage time (in minutes) for the month divided by total time in the month (in minutes). Specific allowed outages may be granted to address special circumstances (i.e., scheduled specification changes, major internet outages, etc...). These specific allowed outages, if granted, may require public posting for all customers to view.

370 While it is acceptable for an entity to contract with a third-party to provide for these requirements, it should be understood that the entity required to employ the Tag Authority Service is ultimately responsible for the provision of the service. The non-performance of a third party does not excuse the entity from the obligation to provide the service.

375 To monitor compliance with these requirements, the Operator of a Tag Authority System may be required to submit, at the beginning of each month, a report describing outage activity for the previous month. This report shall consist of the following items:

1. The beginning of the outage;
- 380 2. The ending of the outage;
3. The type of outage (Scheduled or Unscheduled);
4. The nature of the outage (Maintenance, System Crash, etc...);
5. In the event of an Unscheduled Outage, the cause of the outage and the steps taken to ensure the problem has been addressed and will not reoccur.

385 The report format may be in a standardized electronic form. These documents may be evaluated by and held in confidence. Statistics may be developed from these reports identifying system outage durations for each month. These preliminary findings will be held in confidence until they are confirmed. These performance percentages shall be posted and electronically accessible once confirmed, at the end of the month following the month evaluated.

390 Entities experiencing difficulty due to an Unnoticed Scheduled or Unscheduled Outage may send a Request for Investigation. This request should specify the estimated time the outage occurred, the estimated time the outage ended, and document evidence of the outage (such as TMP logs, email messages, etc...). Claims may be investigated with the appropriate Tag Authority Service Operator. Should a Tag Authority Service Operator be unable to refute the claim, and the Investigation Requestor appears to have provided an accurate representation of an undocumented outage, calculated outage percentages may be modified to include the undocumented incident.

## **B. Failure Procedures**

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400 Backup procedures are needed because, in a communication system that operates on the public  
Internet, failures are certain to occur. The failures may be caused by as a result of overload of  
the network, loss of connection to an Internet service provider, corruption of one or more servers  
by computer hackers, failure of one or more entity’s Internet servers, internal firewall failure,  
and many other reasons.

405 Failures also have a wide variety of scopes. A failure may affect a single entity with a small  
number of schedules while all of its neighbors continue to operate normally, a small number of  
utilities in a local area, or a regional RTO with thousands of active schedules. However failures  
occur, the operation of the electric utility grid must continue. This document describes the  
410 manner in which operations are to be coordinated should such a failure become a reality.

### ***Assumptions***

A general assumption is that each operational entity in the electric utility industry has an internal  
energy management system, marketing system, or contract system that will not be affected by the  
Internet communication failure.

### 415 ***Actors***

**Requesting PSE** – The entity that prepares and submits a Tag and holds the transmission  
reservations being presented for use.

**Path Participant** – Any of the entities that are part of a schedule transaction.

420 **Authority Service Entity** – The entity that provides the Tag Authority Service for a tag. The  
Authority Service itself is a computer system that maintains the master database for the tag and  
communicates status with other computer systems. The Authority Service Entity is the utility  
industry entity that is responsible for providing the service. In E-Tag 1.7.095, this entity is the  
425 Sink BA.

**Approval Entity** – An entity that has approval rights for a transaction. In E-Tag 1.7.095, this  
includes the Transmission Service Providers, scheduling BAs, PSE providing generation, and  
Load Serving Entities.

430 **Checkout Partners**– The entities that perform the Checkout Process. Most commonly two  
adjacent Balancing Authorities checking net interchange. It might also be two marketers  
checking sales and purchases, or a transmission customer checking schedules with a transmission  
provider.

### 435 ***Failure Actions***

When a failure occurs an entity will soon realize that it has lost communications with the other  
servers in the electronic tagging arena. Yet it must still communicate current energy flows  
across the transmission network and expected flows for the next few hours. Transmission

440 curtailments must be accounted for in the sense that a required reduction in energy flows or increase in generation needs to be communicated. However, accounting issues will take a secondary priority to reliability issues in this exchange, and detail relating back to tags, schedules, and transmission reservations can be reconstructed later.

445 If adequate communication cannot be reestablished with other entities’ scheduling systems the last resort will be to control by frequency.

The table below lists typical failures that might occur and the emergency actions that the entity will take to compensate for that failure.

<i>Entity</i>	<i>Connectivity Problem</i>	<i>Backup actions</i>
Requesting PSE	Unable to submit tag to Authority Service.	Ask another entity in the transaction chain to submit the schedule for you. He then becomes the author.  Create a backup paper copy of the schedule and fax to authority service entity and all approval entities in the transaction.
Path Participant	Not receiving update messages.	Use Recovery Process to resynchronize from authority service.  Use telephone with Authority Service Entity to update status.
Authority Service Entity	Unable to send messages to generation or load control area.	Telephone Schedule Author to notify of the message failure. The author will fax the schedule to the Approval Entity for these control areas.  Telephone Approval Entity to notify of the message failure.  Approve or deny the schedule at the request of the Approval Entity (override).
Authority Service Entity	Unable to send messages to an approval entity for an intermediate Transmission Provider or Control Area.	Telephone Schedule Author to notify of the message failure. The author will fax the schedule to the Approval Entity.  Telephone Approval Entity to notify of the message failure.  Approve the schedule automatically.  Deny the schedule at the request of the Approval Entity (override).
Authority Service Entity	Unable to send messages to an information only entity.	No Action required.
Authority Service Entity	Unable to receive messages.	Broadcast a message by email or fax to all entities that use your authority service. The message should forecast a recovery time for your service. In the meantime, your Authority Service is down.

<i>Entity</i>	<i>Connectivity Problem</i>	<i>Backup actions</i>
Approval Entity	Unable to receive messages from an authority service. (The Authority has an obligation to notify you and the authoring PSE. The Authoring PSE has an obligation to fax the tag to the approver.)	Use the Recovery Process to resynchronize from Authority Services or Central Repository. Telephone the Authority Service entity with the approval or denial of the schedule.
Approval Entity	Unable to send messages to an authority service.	Telephone the Authority Service Entity with approval or denial of the schedule.
Checkout Partner	Unable to exchange messages.	Telephone net exchange to the checkout partner. Create a backup paper copy of the checkout data and fax to the checkout partner.

450

Notes:

1. The first action in every case is to attempt to establish connection by using an alternate communication method, a second Internet service provider, dial up connection, or a private network if one is available.
2. Next, the backup actions are attempted in the order specified.
3. The backup actions include printing paper reports from the internal energy management system. The reports include a schedule detail report for a short time period, net exchange between two operational entities, and transmission reservation usage between a transmission provider and a customer.
4. Every backup action list ends with a fax or telephone call that is completely independent of the public Internet.

455

### ***Reports***

460 Three reports have been designed to communicate energy flows and transmission reservation usage between partner entities with a tie where possible back to the schedules as known before the communication failure.

### ***Net Exchange***

A Net Exchange report is a paper summary of Interchange:

- 465 • The time span of the report will cover a period of the current hour to a few hours in the future, up to 24 hours.
- The entity and the partner entity are any two entities that share common schedules.
- The date and time are the date and time of the report.
- Net schedules are the net of schedules from and to the other entity.
- 470 • TO is a sum of the schedules from the entity to the partner entity.
- FROM is a sum of the schedules from the partner entity to the entity.
- Tag or fragment lines represent the data from each tag or fragment that was known at the time of the failure or has been entered later.

- 475
- Recent adjustment lines represent a summary of changes to the schedules that occurred since the failure.

### ***Schedule Detail***

A Schedule Detail report is a paper copy of an individual schedule. It includes:

- 480
- The schedule identification number and most current active revision number.
  - The fully expanded energy schedule for a period of the current hour to a few hours in the future, up to 24 hours.
  - The complete path with all OASIS and contract references.

### ***Reservation Usage***

A transmission Reservation Usage report is a summary of Reservation Usage:

- 485
- The time span of the report will cover a period of the current hour to a few hours in the future, up to 24 hours.
  - The entities on the report are a transmission provider and a transmission contract holder.
  - Gross reservations is the sum of reservations, Usage is the sum of usage.
  - The detail lines are tag or fragment usage of reservation, organized by product and OASIS reservation number.

### ***Recovery Process***

490 The last backup issue is the recovery of current status when the communication link is reestablished. The recovery is accomplished by a query to the authority service for each entity that the entity does business with. The query returns a list of all the schedules that reference that entity with the schedule ID, the current version number and the last modified date and time.

495 The recovering entity then compares with its own database and updates his database to be current with the authority's database. When all authority services have been queried, the recovery is complete.

500 If the entity desires, it can request a complete audit history of each schedule.

## Appendix C

### Transaction Tag Actions

#### 505 *For Eastern and Western Interconnections*

The table below explains the various tag actions that are possible, and the entities that are entitled to initiate these actions:

Desired Policy Action	Reason	Tagging Action	Initiated by	Result
Approve a Tag Request	Economic, Reliability, or Contractual	Set Status (to Approved)	Approval Entity*	Approver indicates approval
Deny a Tag Request	Economic, Reliability, or Contractual	Set Status (to Denied)	Approval Entity*	Approval indicates denial
Study a Tag Request	Economic, Reliability, or Contractual	Set Status (to Studied)	Approval Entity*	Approval indicates the tag has been viewed, but have not committed to a decision
Withdraw a Tag Request	Economic	Withdraw Request prior to request implementation	Requesting PSE**	Request is dead
Cancel a New Tag	Economic	Request Profile Change – Set Energy and Capacity for the transaction to zero prior to transaction start	Requesting PSE**	Tag is dead
Terminate a Tag	Economic	Request Profile Change – Set Energy and capacity of the transaction to zero from a point of time forward	Requesting PSE**	Portion of tag is dead
Extend a Tag	Economic	Request Profile Change – Append additional hours onto an existing transaction	Requesting PSE**	Tag is extended
Reduce a Tag	Economic	Request Profile Change – Decrease Energy flow or Committed Transmission Reservation(s) for a transaction for a specific set of hours	Requesting PSE**, Market Operator***	Profile is Decreased
Increase a Tag	Economic	Request Profile Change – Increase Energy flow or Committed Transmission Reservation(s) for a transaction for a	Requesting PSE**, Market Operator***	Profile is Increased



Desired Policy Action	Reason	Tagging Action	Initiated by	Result
		specific set of hours		
Curtail a Tag	Reliability (OSL Violation, Loss of Gen, loss of Load)	Request Profile Change – Limit Energy flow for a transaction for a specific set of hours	Source BA, Sink BA, Transmission Service Provider, Scheduling Agent	Profile is Decreased
Reload a Tag	OSL Violation eliminated, Generator Returned, Load Returned	Request Profile Change – Release Limit of Energy flow for a transaction for a specific set of hours	Source BA, Sink BA, Transmission Service Provider, Scheduling Agent	Profile is Increased

510 Notes:

\*Purchasing-Selling Entities and Load-Serving Entities may elect to defer their approval rights to the Host Balancing Authority of their facilities. For more information, see PSE and LSE approval rights below

515 \*\*In some situations, Balancing Authorities implement certain Interchange Transactions or Interchange Schedules, such as bilateral inadvertent payback, Dynamic Schedules, and emergency schedules from Reserve Sharing Groups. In these situations, the Balancing Authority serves as the Purchasing-Selling Entity and can perform these actions.

520 \*\*\*Entities registered as market operators and serving as either source or sink for a Transaction may exercise such functions in order to indicate correct flow based on market clearing.

***PSE and LSE Approval Rights***

525 Purchasing-Selling Entities providing generation and Load-Serving Entities have been granted the right, but not the obligation, to approve Transaction requests using their resources. If PSEs and LSEs specify an approval service in the Master Registry, then they are expected to approve/deny Transactions when so requested. Otherwise, their Host Balancing Authority is expected to act on their behalf. The following table illustrates the proper way to interpret this requirement:

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If the PSE...	Specified an Approval URL	The PSE should be granted rights to approve or deny
	Did not specify an Approval URL	The BA should have proxy approval rights for the PSE

## Appendix D

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### Required and Correctable Tag Data

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535 *Appendix Subsections*

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- A. New Transactions
  - B. Curtailments and Reloads (Reliability Profile Modifications)
  - C. Market Related Profile Modifications
- 

#### A. New Transactions

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540 A new Interchange Transaction is a Transaction that has not yet been implemented or confirmed for implementation. Such Transactions must be presented to those entities that are responsible for the implementation of the Transaction in order that they may evaluate the Transaction request and determine whether or not the Transaction can be implemented. The following information is to be used to describe such a Transaction.

545 **1. Market Information**

**1.1.** Market Redispatch Information (only required if Transaction is MRD Transaction). (See “E-Tag Functional Specification Version 1.7095”)

550 **1.2.** Financial Path (Required) – the description of financially responsible parties for the transaction in order. This will typically start with a Purchasing-Selling Entity providing generation and finish with a Load Serving Entity, and where applicable, intermediate Purchasing-Selling Entities between the two.

555 **1.2.1.** Energy Title Holder(s) (Required) – the identity of the entities financially responsible to take and/or deliver the energy as described in the physical path. This will typically be a Purchasing-Selling Entity providing generation, a Load Serving Entity, and where applicable, Intermediate Purchasing-Selling Entities.

**1.2.1.1.** Energy Product Type (Correctable) – the type of energy delivered by the Energy Title Holder.

560 **1.2.1.2.** Contract Number(s) (Correctable) – reference to a Transaction entered into by the Energy Title Holder with one or more other participants in the Transaction.

**1.2.1.3.** Miscellaneous Information (Correctable) – information provided at the author’s option regarding the Transaction.

**2. Physical Information**

565 **2.1.** Physical Path (Required) – the description of physically scheduling parties for the transaction in order and related to the financially responsible parties described above. This will always contain a Generation segment, at least one Transmission segment, and a Load segment.

**2.1.1.** Generation (Required) – set of data describing the physical and contractual characteristics of the energy source.

- 570                   **2.1.1.1.** Source (Required) – the physical point at which the energy is being generated. This may vary in granularity, dependent on local business practices.
- 575                   **2.1.1.2.** Contract Number(s) (Correctable) – reference to a schedule or agreement entered into by the Purchasing-Selling Entity providing generation and the Generator Operator.
- 2.1.1.3.** Miscellaneous Information (Correctable) – information provided at the Requesting PSE’s option regarding the Transaction.
- 2.1.1.4.** Energy Profile (Required) – energy to be produced by the Generator Owner for this Transaction.
- 580           **2.1.2.** Transmission (Required) – set of data describing the physical and contractual characteristics of a wheel (import, export, or through).
- 2.1.2.1.** Transmission Service Provider (Required) – the identity of the transmission provider that is wheeling the energy.
- 585                   **2.1.2.2.** Point of Receipt (Correctable) – valid Point of Receipt for scheduled Transmission Reservation.
- Point of Delivery (Correctable) – valid Point of Delivery for scheduled Transmission Reservation.
  - Scheduling Agent (Correctable) – entity that is physically scheduling interchange on behalf of the Transmission Service Provider in order to provide wheeling services. Typically this is the Balancing Authority for the Transmission Service Provider, but may be several Balancing Authorities supporting a regional transmission service.
  - Loss Provision Information (Required) (Correctable)– Information describing the manner in which losses are accounted when they are not scheduled as in-kind megawatt distributions through the original transaction. Types may be financial (paid in dollars based on tariff provisions), internal (scheduled in megawatts to the Transmission Service Provider from a resource inside the Transmission Service Provider’s area), or external (scheduled in megawatts to the Transmission Service Provider from a resource outside the Transmission Provider’s area). If internal or external, must specify contract numbers or Transaction IDs.
  - Miscellaneous Information (Correctable) – information provided at the requesting PSE’s option regarding the transaction.
  - POR and POD Profiles (Required) – schedule of Energy Flow imported at the Point of Receipt and exported at the Point of Delivery.
  - Transmission Reservation Number(s) (Required) (Correctable) – reference to a particular transmission reservation being used to provide transmission capacity to support the transaction being described.
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- 595
- 600
- 605
- 610

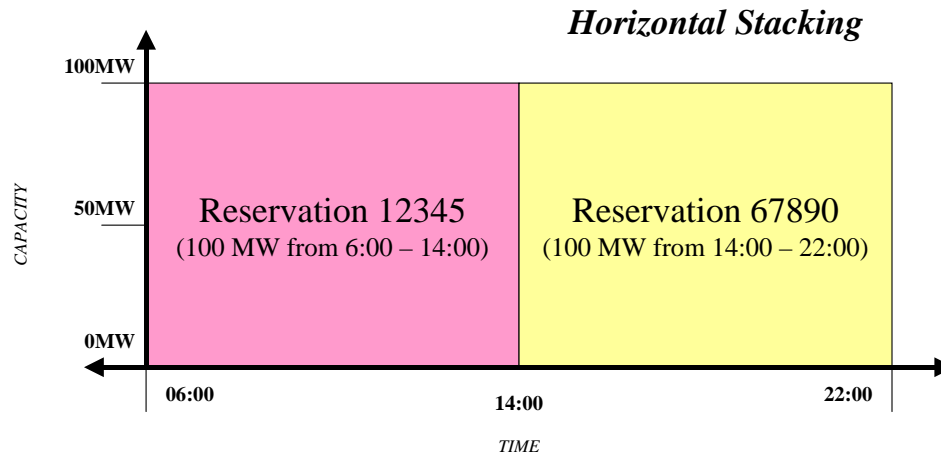
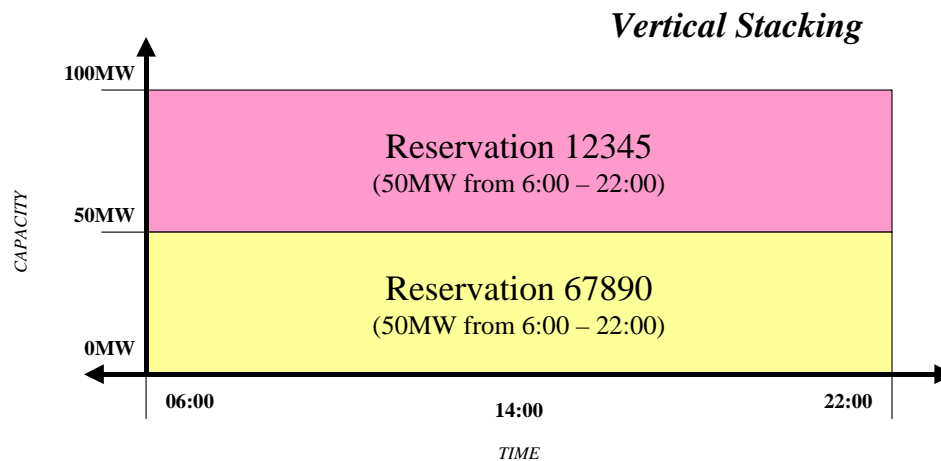
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- 2.1.2.2.1.** Transmission Product (Required) (Correctable) – Specifies the firmness of service associated with the transmission reservation being used.
  - 2.1.2.2.2.** Requesting PSE (Required) (Correctable) – identifies the entity that purchased and holds the transmission reservation being presented for use.
  - 2.1.2.2.3.** Transmission Reservation Profile (Required) - information describing the transmission reservation commitment associated with the Transmission Service Provider.
    - 2.1.2.2.3.1.** Committed Transmission Reservation Level (Required) – schedule of transmission reservation committed by the Requesting Purchasing-Selling Entity for use for this Transaction.
  - 2.1.3.** Load (Required) – set of data describing the physical and contractual characteristics of the energy sink.
    - 2.1.3.1.** Sink (Required) – the physical point at which the energy is being consumed. This may vary in granularity, dependent on local business practices.
    - 2.1.3.2.** Contract Number(s) (Correctable) – reference to a schedule or agreement entered into by the Load Serving Entity and the Distribution Provider.
    - 2.1.3.3.** Miscellaneous Information (Correctable) – information provided at the requesting PSE’s option regarding the Transaction.
    - 2.1.3.4.** Energy Profile (Required) – energy to be consumed by the load for this Transaction.

640 ***Using Multiple Transmission Reservations to Support a Single Leg of an Interchange Transaction***

The use of multiple transmission reservations to support a single leg of an Interchange Transaction is known as transmission stacking. There are two types of transmission stacking:

- 645
- Vertical stacking, in which a Requesting Purchasing-Selling Entity combines multiple reservations to achieve a certain net level of transmission capacity, and
  - Horizontal stacking, in which a Requesting Purchasing-Selling Entity combines multiple reservations to achieve a certain transmission capacity coverage over time.

650 The following diagrams illustrate these concepts more fully. In both cases, the assumed need is 100 MW of transmission capacity for hours 06:00 through 22:00.



655 Should a Requesting PSE elect to utilize stacking, including any combination of the two stacking types, to support their INTERCHANGE TRANSACTION, they must understand the following requirements:

- 660
- Stacks MUST be described through fully qualified profiles for each reservation being used
  - At no point may the coverage described by the stack be less than the transmission capacity needed for the TRANSACTION'S energy flow

**B. Curtailments and Reloads (Reliability Related Profile Modifications)**

665 Curtailments and Reloads are special kinds of modifications to a transactions energy profile based on reliability concerns. Such modifications must be presented to those entities that are responsible for the implementation of the modification in order that they may evaluate the transaction request and determine whether or not the modification can be implemented. The following information must be used to describe such a modification.

- 670
- The TRANSACTION being curtailed or reloaded

- All necessary profile changes to set the maximum flow allowed for the transaction during the appropriate hours
- A contact person that initiated the curtailment or reload, and
- A description of the necessity for the schedule change.

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## **C. Market-Related Profile Modifications**

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Profile Modifications are changes to a TRANSACTION’S energy profile based on market desires. Such modifications must be presented to those entities that are responsible for the implementation of the modification in order that they may evaluate the TRANSACTION request and determine whether or not the modification can be implemented. The following information must be used to describe such a modification.

680

- The TRANSACTION being modified
- All necessary profile changes to set the transmission capacity or energy flow to the desired levels during the appropriate hours, and
- A contact person that initiated the modification.

685

5 Standard #: WEQBPS-005-000

# Inadvertent Interchange Payback

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Purpose:

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This standard defines the method (s) in which Inadvertent Energy is paid back.

10 Applicability:

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This standard applies to all Balancing Authorities.

Effective Date: [date]

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Definitions:

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15 **Area Control Error (ACE)** - The instantaneous difference between net actual and scheduled interchange, taking into account the effects of frequency bias, including a correction for meter error.

20 **Balancing Authority (BA)** - The entity responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time.

25 **Balancing Authority Area** - An electrical system bounded by interconnection (tie-line) metering and telemetry, where the Balancing Authority controls (either directly or by contract) generation to maintain its Interchange Schedule with other Balancing Authority Areas and contributes to frequency regulation of the Interconnection.

**CPS** – Control Performance Standard as defined by NERC

30 **Inadvertent Interchange** - The difference between a Balancing Authority’s net actual interchange and net scheduled interchange.

35 **Interchange Schedule** - The planned energy exchange between two adjacent Balancing Authorities.

**Interconnection** – Any one of the three major electric system networks in North America: Eastern, Western, and ERCOT.

40 **L<sub>10</sub>** – A control error limitation specified in NERC standards.

**Regions** - One of the North American Electric Reliability Council regional councils or affiliate.

45 **Transmission Service Provider (TSP)** - The entity that administers the transmission tariff and provides transmission services to qualified market participants under applicable transmission service agreements

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## Business Practices Requirements

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- 50 1. **Inadvertent Interchange payback.** Each Balancing Authority shall be diligent in  
reducing Inadvertent Interchange accumulations. Balancing Authorities shall payback  
Inadvertent Interchange accumulations by one of the following methods:
- 55 1.1. **Energy “in-kind” payback.** Inadvertent Interchange accumulated during “On-  
Peak” hours shall only be paid back during “On-Peak” hours. Inadvertent  
Interchange accumulated during “Off-Peak” hours shall only be paid back during  
“Off-Peak” hours. [See Appendix A, “On-Peak and Off-Peak Periods.”]
- 60 1.1.1. **Bilateral payback.** Inadvertent Interchange accumulations may be paid  
back via an Interchange Schedule with another Balancing Authority.
- 65 1.1.1.1. **Opposite balances.** The source Balancing Authority Area and  
sink Balancing Authority Area must have Inadvertent Interchange  
accumulations in the opposite direction.
- 70 1.1.1.2. **Payback terms.** The terms of the Inadvertent Interchange  
payback shall be agreed upon by all involved Balancing  
Authorities and Transmission Service Providers.
- 75 1.1.2. **Unilateral payback.** Inadvertent Interchange accumulations may be paid  
back unilaterally controlling to a target of non-zero ACE. Controlling to a  
nonzero ACE ensures that the unilateral payback is accounted for in the  
CPS calculations. The unilateral payback control offset is limited to  
Balancing Authority ‘s L<sub>10</sub> limit and shall not burden the Interconnection.
- 80 1.2. **Other payback methods.** Upon agreement by all Regions within an  
Interconnection, other methods of Inadvertent Interchange payback may be  
utilized.



85 **Appendix A**

## Inadvertent Interchange On and Off Peak Periods

90 **On-Peak and Off-Peak Periods**1. *On-Peak and Off-Peak Hours (Monday Through Sunday)*

**On and Off-Peak designation.** The hourly inadvertent energy created by a Balancing Authority is classified as either On-Peak or Off-Peak inadvertent. The peak designation assigned is a function of hour of day, day of week, time zone, prevailing time (standard or daylight savings), and special holiday status.

95 **Daylight Saving Time.** The On-Peak to Off-Peak and Off-Peak to On-Peak boundary hours are unaffected by transitions to or from daylight savings time. If a Balancing Authority remains on either standard or daylight savings time throughout the year, their inadvertent accounting practices shall use prevailing time.

100 **On-peak hours.** Each Interconnection has a reference time zone and standardized On-Peak and Off-Peak periods. On-Peak periods are summarized in the table below for each Interconnection. Sundays and special holidays are designated to be Off-Peak periods for the entire day. Hours for Monday through Saturday that are not shown in the table below are also designated as Off-Peak hours.

105 2. *On-Peak Hours For Monday Through Saturday In Hour-Ending Format*

<i>Interconnection</i>	<i>Reference Time Zone</i>	<i>Hour Ending</i>	
		<i>From</i>	<i>To</i>
Eastern	Central	0700	2200
ERCOT	Central	0800	2200
Western	Pacific	0700	2200

3. *Off-Peak Holidays for the Eastern and Western Interconnections*

There are six identified U.S. holidays each year:

110

- New Year's Day
- Memorial Day

- Independence Day
- Labor Day
- 115 • Thanksgiving Day
- Christmas Day

If any of these holidays fall on a Sunday, the following Monday will be considered an Off-Peak day. Otherwise, the Off-Peak day will be the holiday itself.

Standard #: WEQBPS-004-000

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# Manual Time Error Correction

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5 Purpose:

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Interconnection frequency is normally scheduled at 60.00 Hz and controlled to that value. The control is imperfect and over time the frequency will average slightly above or below 60.00 Hz resulting in mechanical electric clocks developing an error relative to true time. This Standard specifies the procedure to be used for reducing the error to within acceptable limits of true time.

10 Applicability:

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Balancing Authorities  
Interconnection Time Monitor

Effective Date: [date]

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Definitions:

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20 **Balancing Authority (BA)** – The entity responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time.

25 **Balancing Authority Area** - An electrical system bounded by interconnection (tie-line) metering and telemetry, where the Balancing Authority controls (either directly or by contract) generation to maintain its Interchange Schedule with other Balancing Authority Areas and contributes to frequency regulation of the Interconnection.

30 **Frequency Bias Setting** - A value, in MW/0.1 Hz, set into a Balancing Authority's AGC equipment to represent a Balancing Authority's response to a frequency deviation.

**Interchange Schedule** - The planned energy exchange between two adjacent Balancing Authorities.

35 **Interconnection** – Any one of the three major electric system networks in North America: Eastern, Western, and ERCOT.

**Interconnection Time Monitor** – An entity that monitors Time Error and initiates and terminates Time Error Corrections.

40 **Leap Second** - A Leap Second is a second of time added to Coordinated Universal Time to make it agree with astronomical time to within 0.9 seconds. Historically, Leap Seconds are

implemented as needed on June 30<sup>th</sup> or December 31<sup>st</sup>. (National Institute of Standards and Technology)

45 **Time Error** – Accumulated time difference between time based on Interconnection frequency and the National Bureau of Standards time.

**Time Error Correction** - An offset to the Interconnection’s scheduled frequency to correct for accumulated Time Error.

50 **WECCNet – a messaging system used by the Western Electric Coordinating Council (WECC) for use by participating utility’s dispatchers and network administrators.**

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### **Business Practices Requirements**

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- 55 1. Each Balancing Authority shall participate in Time Error Correction unless it is operating asynchronously to its Interconnection.
- 60 1.1. Balancing Authorities operating asynchronously who establish their own time error control bands, shall notify the Interconnection Time Monitor of the bands being utilized, and shall also provide notification if they are changed.
2. An Interconnection Time Monitor shall exist for each Interconnection.
3. The Interconnection Time Monitor shall calibrate its time error device at least annually against the National Bureau of Standards time.
- 65 4. Time Error initiation. Time error corrections shall start and end on the hour or half-hour, and notice shall be given at least one hour before the time error correction is to start or stop. Time Error corrections shall last at least one hour, unless terminated by a Reliability Coordinator. Time Error corrections for fast time shall not be initiated between 0400-1100 Central Time.
- 70 All Balancing Authorities within an Interconnection shall make all Time Error corrections directed by the Interconnection Time Monitor for its Interconnection. All Balancing Authorities within an Interconnection shall make Time Error Corrections at the same rate.
5. Interconnection time monitoring. Each Interconnection Time Monitor shall monitor time error and shall initiate or terminate corrective action orders according to the following table:

75

<b>Time (seconds)</b>	<i>Initiation</i>			<i>Termination</i>		
	<b>East</b>	<b>West</b>	<b>ERCOT</b>	<b>East</b>	<b>West</b>	<b>ERCOT</b>
<b>Slow</b>	-10	-2	-3	-6	±0.5	±0.5
<b>Fast</b>	+10	+2	+3	+6	±0.5	±0.5

6. Time Error Correction labeling. Time error correction notifications shall be labeled alphabetically on a monthly basis (A-Z, AA-AZ, BA-BZ,...).
7. Time correction offset. Each Balancing Authority, when requested, shall participate in a Time Error Correction by one of the following two methods:
  - 7.1. Frequency offset. The Balancing Authority may offset its frequency schedule in accordance to the directives of the Interconnection Time Monitor, leaving the Frequency Bias Setting normal,
  - 7.2. Schedule offset. If the frequency schedule cannot be offset as directed by the Interconnection Time Monitor, the Balancing Authority may offset its net Interchange Schedule (MW) by an amount equal to the computed bias contribution during an equivalent frequency deviation`.
8. Interconnection Time Error notification. On the first day of each month, the Interconnection Time Monitor shall issue a notification of time error accurate to within 0.01 second to all Reliability Coordinators within the Interconnection to assure uniform calibration of time standards.
9. Western Interconnection time error notification. Within the Western Interconnection, the Interconnection Time Monitor shall provide the accumulated time error (accurate to within 0.001 second) to all Balancing Authorities on a daily basis at 1400 PDT/PST using the WECCNet. The alphabetic designator shall accompany time error notification if a time error correction is in progress.
10. After the premature termination of a manual time correction, a slow time correction can be reinstated after the frequency has returned to 60 Hz or above for a period of ten minutes. A fast time correction can be reinitiated after the frequency has returned to 60 Hz or lower for a period of ten minutes. At least one hour shall elapse between the termination and re-initiation notices.
11. Time correction on reconnection. When one or more Balancing Authorities have been separated from the Interconnection, upon reconnection, they shall adjust their time error devices to coincide with the time error of the Interconnection Time Monitor. The Balancing Authorities shall notify the Interconnection Time Monitor they are ready to receive the necessary adjustment to time error as soon as possible after reconnection.
12. Leap Seconds. Balancing Authorities using time error devices that are not capable of automatically adjusting for Leap Seconds shall arrange to receive advance notice of the Leap Second and make the necessary manual adjustment in a manner that will not introduce an improper Interchange Schedule into their control system.

Standard #: WEQBPS – 006-000

# Transmission Loading Relief – Eastern Interconnection

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5 Purpose:

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This standard defines procedures for curtailment and reloading of Interchange Transactions to relieve overloads on transmission facilities modeled in the IDC. This process is defined in the requirements below, is depicted in Appendix A, and examples of curtailment calculations using these procedures are in Appendix B.

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Applicability:

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This standard only applies to the Eastern Interconnection.

Effective Date: [date]

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Definitions:

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**Approval Entity** – An entity that has approval rights for an Interchange Transaction Tag. This includes the Transmission Service Providers (TSP), Balancing Authorities (BA), Purchasing-Selling Entities (PSE), and Load Serving Entities (LSE) involved in the Interchange Transaction.

20

**Balancing Authority (BA)** – The entity responsible for integrating resource plans ahead of time, maintaining load-interchange-generation balance within a Balancing Authority Area, and supporting Interconnection frequency in real time.

25

**Balancing Authority Area** - An electrical system bounded by interconnection (tie-line) metering and telemetry, where the Balancing Authority controls (either directly or by contract) generation to maintain its Interchange Schedule with other Balancing Authority Areas and contributes to frequency regulation of the Interconnection.

30

**Constrained Facility** – A transmission facility (line, transformer, breaker, etc.) that is approaching, is at, or is beyond its SOL or IROL.

**Constraint**– A limitation placed on Interchange Transactions that flow over a Constrained Facility.

35

**Contract Path** - A predetermined electrical path established for scheduling and commercial settlement purposes that represents the continuous flow of electrical energy

40 between the parties to a transaction. The contract path does not necessarily represent the path the energy actually will flow.

45 **Curtailment Threshold** – The minimum Transfer Distribution Factor which, if exceeded, will subject an Interchange Transaction to curtailment to relieve a transmission facility Constraint.

45 **Firm Transmission Service** - The highest quality service offered to customers under a filed rate schedule that anticipates no planned interruption.

50 **Generation Shift Factor (GSF)** – A factor to be applied to a generator’s expected change in output to determine the amount of flow contribution that change in output will impose on an identified transmission facility or monitored flowgate.

55 **Generator to Load Distribution Factor (GLDF)** - the algebraic sum of a GSF and an LSF to determine to total impact of an Interchange Transaction on an identified transmission facility or monitored flowgate.

60 **Interchange Distribution Calculator (IDC)** – The mechanism used by Reliability Coordinators in the Eastern Interconnection to calculate the distribution of Interchange Transactions over specific transmission interfaces, which are known as “Flowgates.” It includes a database of all Interchange Transactions and a matrix of the Distribution Factors for the Eastern Interconnection.

65 **Interchange Transaction** - A Transaction that crosses one or more Balancing Authorities’ boundaries. The planned energy exchange between two adjacent Balancing Authorities.

70 **Interchange Transaction Tag (Tag)** – An Interchange Transaction being submitted for implementation according to Version 1.7.095 NERC Transaction Information Systems Working Group (TISWG) *Electronic Tagging Functional Specification*

70 **Interconnection** – Any one of the three major electric system networks in North America: Eastern, Western, and ERCOT.

75 **Interconnection Reliability Operating Limit (IROL)** – The value (such as MW, MVar, Amperes, Frequency or Volts) derived from, or a subset of the System Operating Limit, which if exceeded, could expose a widespread area of the Bulk Electric System to instability, uncontrolled separation(s) or cascading outages.

80 **Load Shift Factor (LSF)** - A factor to be applied to a load’s expected change in demand to determine the amount of flow contribution that change in demand will impose on an identified transmission facility or monitored flowgate.

85 **Native Load (NL)** - The demand imposed on an electric utility or an entity by the requirements of all customers located within a franchised service territory that the electric utility or entity has statutory or contractual obligation to serve.

**NERC** – North American Electric Reliability Council

90 **Network Integration (NI) Transmission Service** – As specified in the Transmission Service Providers tariff, service that allows an electric transmission customer to integrate, plan, economically dispatch and regulate its network resources in a manner comparable to that in which the transmission owner serves native load customers.

95 **Non-Firm Transmission Service** - As specified in the Transmission Service Providers tariff, transmission service that is reserved and scheduled on an as-available basis and is subject to curtailment or interruption.

100 **Point to Point (PTP) Transmission Service** - As specified in the Transmission Service Providers tariff, transmission Service reserved and/or scheduled between specified points of receipt and delivery.

105 **Purchasing-Selling Entity (PSE)** – The entity that purchases or sells and takes title to energy capacity and interconnected operations services. PSE’s may be affiliated or unaffiliated merchants and may and may not own generating facilities.

**Reliability Coordinator Information System** – RCIS

110 **Reallocation** - The total or partial curtailment of Transactions during TLR Level 3a or 5a to allow Transactions using equal or higher priority to be implemented.

**Reliability Area** - The collection of generation, transmission, and loads within the boundaries of the Reliability Coordinator. Its boundary coincides with one or more Balancing Authority Areas.

115 **Reliability Coordinator (RC)** - An entity that provides the security assessment and emergency operations coordination for a group of Balancing Authorities, Transmission Service Providers, and Transmission Operators.

120 **Sink Balancing Authority** - The Balancing Authority in which the load (Sink) is located for an Interchange Transaction. (This will also be a receiving balancing authority for the resulting Interchange Schedule).

125 **System Operating Limit (SOL)** - The value (such as MW, MVar, Amperes, Frequency or Volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria.



**Tie Facility(ies)** – The transmission facility(ies) interconnecting Balancing Authority Areas.

130

**Transfer Distribution Factor (TDF)** - The portion of an Interchange Transaction, expressed in percent that flows across a transmission facility (Flowgate).

**Transmission Customer** - Any eligible customer (or its designated agent) that can or does execute a transmission service agreement or can or does receive transmission service.

135

**Transmission Loading Relief (TLR)** - A procedure used in the Eastern Interconnection to relieve potential or actual loading on a constrained facility.

140

**Transmission Operator** – The entity that operates or directs the operations of the transmission facilities

**Transmission Service** – Services needed to move energy from a receipt point to a delivery point provided to Transmission Customers by the Transmission Service Provider.

145

**Transmission Service Provider (TSP) or Transmission Provider (TP)** - The entity that administers the transmission tariff and provides transmission services to qualified market participants under applicable transmission service agreements.

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## **Requirements**

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### **1. Transmission Loading Relief (TLR) Procedure**

1.1. **Initiation only by Reliability Coordinator.** A Reliability Coordinator shall be the only entity authorized to initiate the TLR Procedure and shall do so at 1) the Reliability Coordinator’s own request, or 2) upon the request of a Transmission Operator.

160

1.2. **Mitigating transmission constraints.** A Reliability Coordinator may utilize the TLR Procedure to mitigate potential or actual System Operating Limit (SOL) violations or Interconnection Reliability Operating Limit (IROL) violations on any transmission facility modeled in the Interchange Distribution Calculator (IDC).

165

1.2.1. **Requesting relief on tie facilities.** Any Transmission Operator who operates the tie facility shall be allowed to request relief from its Reliability Coordinator.

- 170                   1.2.1.1.    **Interchange Transaction priority on tie facilities.**  
                          The priority of the Interchange Transaction(s) to be  
                          curtailed shall be determined by the Transmission  
                          Service reserved on the Transmission Service  
                          Provider’s system who requested the relief.
- 175           1.3.    **Order of TLR Levels and taking emergency action.** The Reliability  
                  Coordinator shall not be required to follow the TLR Levels in their  
                  numerical order (Requirement 2, “TLR Levels”). Furthermore, if a  
                  Reliability Coordinator deems that a transmission loading condition could  
                  jeopardize bulk system reliability, the Reliability Coordinator shall have  
180                   the authority to enter TLR Level 6 directly, and immediately direct the  
                  Balancing Authorities or Transmission Operators to take such actions as  
                  re-dispatch generation, or reconfigure transmission, or reduce load to  
                  mitigate the critical condition until Interchange Transactions can be  
                  reduced utilizing the TLR Transaction Curtailment Procedures, or other  
                  methods, to return the system to a secure state.
- 185           1.4.    **Notification of TLR Procedure implementation.** The Reliability  
                  Coordinator initiating the use of the TLR Procedure shall notify other  
                  Reliability Coordinators and Balancing Authorities and Transmission  
                  Operators, and must post the initiation and progress of the TLR event on  
                  the appropriate NERC web page(s).
- 190           1.4.1.   **Notifying other Reliability Coordinators.** The Reliability  
                  Coordinator initiating the TLR Procedure shall inform all other  
                  Reliability Coordinators via the Reliability Coordinator  
                  Information System (RCIS) that the TLR Procedure has been  
                  implemented.
- 195                   1.4.1.1.   **Actions expected.** The Reliability Coordinator  
                          initiating the TLR Procedure shall indicate the  
                          actions expected to be taken by other Reliability  
                          Coordinators.
- 200           1.4.2.   **Notifying Transmission Operators and Balancing Authorities.**  
                  The Reliability Coordinator shall notify Transmission Operators  
                  and Balancing Authorities in its Reliability Area when entering  
                  and leaving any TLR level.
- 205           1.4.3.   **Notifying Balancing Authorities.** The Reliability Coordinator for  
                  the sink Balancing Authority shall be responsible for directing the  
                  sink Balancing Authority to curtail the Interchange Transactions as  
                  specified by the Reliability Coordinator implementing the TLR  
                  Procedure.

- 210 1.4.3.1. **Notification order.** Within a Transmission Service priority level, the Sink Balancing Authorities whose Interchange Transactions have the largest impact on the Constrained Facilities shall be notified first if practicable.
- 215 1.4.4. **Updates.** At least once each hour, or when conditions change, the Reliability Coordinator implementing the TLR Procedure shall update all other Reliability Coordinators (via the RCIS). Transmission Operators and Balancing Authorities who have had Interchange Transactions impacted by the TLR will be updated by their Reliability Coordinator.
- 220 1.5. **Obligations.** All Reliability Coordinators shall comply with the request of the Reliability Coordinator who initiated the TLR Procedure, unless the initiating Reliability Coordinator agrees otherwise.
- 225 1.5.1. **Use of TLR Procedure with “local” procedures.** A Reliability Coordinator shall be allowed to implement a local transmission loading relief or congestion management procedure simultaneously with an Interconnection-wide procedure. However, the Reliability Coordinator shall be obligated to follow the curtailments as directed by the Interconnection-wide procedure. If the Reliability Coordinator desires to use a local procedure as a substitute for curtailments as directed by the Interconnection-wide procedure, it may do so only if such use is approved by the NERC Operating Committee.<sup>1</sup>
- 230
- 235 1.6. **Consideration of Interchange Transactions.** The administration of the TLR Procedure shall be guided by information obtained from the IDC.
- 240 1.6.1. **Interchange Transactions not in the IDC.** Reliability Coordinators shall also treat known Interchange Transactions that may not appear in the IDC in accordance with the procedures in this document.
- 1.6.2. **Transmission elements not in IDC.** When a Reliability Coordinator is faced with an overload on a transmission element that is not modeled in the IDC, the Reliability Coordinator shall use the best information available to curtail Interchange Transactions in order to operate the system in a reliable manner. The Reliability Coordinator shall use its best efforts to ensure that Interchange Transactions with a Transfer Distribution Factor of

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<sup>1</sup> Examples would be 1) a local procedure that curtails INTERCHANGE TRANSACTIONS in a different order or ratio than the INTERCONNECTION-wide procedure, or 2) a local re-dispatch procedure.

245 less than the Curtailment Threshold on the transmission element  
not modeled in the IDC are not curtailed.

250 1.6.3. **Questionable IDC results.** Any Reliability Coordinator (or  
Transmission Operator through its Reliability Coordinator) who  
believes the curtailment list from the IDC for a particular TLR  
event is incorrect shall use its best efforts to communicate those  
adjustments necessary to bring the curtailment list into  
conformance with the principles of this Procedure to the initiating  
Reliability Coordinator. Causes of questionable IDC results may  
include:

- 255
- Missing Interchange Transactions that are known to contribute to the Constraint.
  - Significant change in transmission system topology
  - TDF matrix error.

Impacts of questionable IDC results may include:

- 260
- Curtailment that would have no effect on, or aggravate the constraint.
  - Curtailment that would initiate a constraint elsewhere.

265 If other Reliability Coordinators are involved in the TLR event, all  
impacted Reliability Coordinators shall be in agreement before any  
adjustments to the curtailment list are made.

270 1.6.4. **Curtailment that would cause a constraint elsewhere.** A  
Reliability Coordinator shall be allowed to exempt an Interchange  
Transaction from curtailment if that Reliability Coordinator is  
aware that the Interchange Transaction curtailment directed by the  
IDC would cause a constraint to occur elsewhere. This exemption  
shall only be allowed after the Reliability Coordinator has  
consulted with the Reliability Coordinator who initiated the  
curtailment.

275 1.6.5. **Re-dispatch options.** The Reliability Coordinator shall ensure that  
Interchange Transactions that are linked to re-dispatch options are  
protected from curtailment in accordance with the re-dispatch  
provisions.

280 1.6.6. **Reallocation.** The Reliability Coordinator shall consider for  
Reallocation any Transactions of higher priority that meet the  
approved Tag submission deadline during a TLR Level 3A. The  
Reliability Coordinator shall consider for Reallocation any  
Transaction using Firm Transmission Service that has met the  
approved Tag submission deadline during a TLR Level 5A.

- 285 1.7 **IDC updates.** Any Interchange Transaction adjustments or curtailments that result from using this Procedure must be entered into the IDC.
- 1.8 **Logging.** The Reliability Coordinator shall complete the NERC Transmission Loading Relief Procedure Log whenever it invokes TLR Level 2 or above, and send a copy of the log via e-mail to NERC within two business days of the TLR event for posting on the NERC web site.
- 290 1.9 **TLR Event Review.** The Reliability Coordinator shall report the TLR event to the NERC Market Committee and Operating Reliability Subcommittee in accordance with TLR review processes established by NERC as required.
- 295 1.9.1. **Providing information.** Transmission Operators and Balancing Authorities within the Reliability Coordinator’s Area, and all other Reliability Coordinators, including Transmission Operators and Balancing Authorities within their respective Reliability Areas, shall provide information, as requested by the initiating Reliability Coordinator, in accordance with TLR review processes established by NERC.
- 300
- 1.9.2. **Market Committee reviews.** The Market Committee may conduct reviews of certain TLR events based on the size and number of Interchange Transactions that are affected, the frequency that the TLR Procedure is called for a particular Constrained Facility, or other factors.
- 305
- 1.9.3. **Operating Reliability Subcommittee reviews.** The Operating Reliability Subcommittee shall conduct reviews to ensure proper implementation and for “lessons learned”.

310 2. **Transmission Loading Relief (TLR) Levels**

**Introduction**

This requirement describes the various levels of the TLR Procedure. The description of each level begins with the circumstances that define the TLR Level, followed by the procedures to be followed.

315

The decision that a Reliability Coordinator makes in selecting a particular TLR Level often depends on the transmission loading condition and whether the Interchange Transaction is using Non-firm Point-to-Point Transmission Service or Firm Point-to-Point Transmission Service. There are further considerations that depend on whether the Constrained Facility is on or off the contract path. It is important to note that an Interchange Transaction using Firm Point-to-Point Transmission Service on all contract path links is considered a “firm” Interchange Transaction even if the Constrained Facility is off the contract path.

320

325

2.1. **TLR Level 1 – Notify Reliability Coordinators of potential SOL or IROL Violations.**

2.1.1. The Reliability Coordinator shall use the following circumstances to establish the need for TLR Level 1:

- The transmission system is secure.
- The Reliability Coordinator foresees a transmission or generation contingency or other operating problem within its Reliability Area that could cause one or more transmission facilities to approach or exceed their SOL or IROL.

330

2.1.2. **Notification procedures.** The Reliability Coordinator shall notify all Reliability Coordinators via the Reliability Coordinator Information System as soon as the condition is foreseen. All affected Reliability Coordinators shall check to ensure that Interchange Transactions are posted in the IDC.

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340

2.2. **TLR Level 2 – Hold transfers at present level to prevent SOL or IROL Violations**

2.2.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 2:

- The transmission system is secure,
- One or more transmission facilities are expected to approach, or are approaching, or are at their SOL or IROL.

345

350 2.2.2. **Holding procedures.** The Reliability Coordinator shall be allowed to hold the implementation of any additional Interchange Transactions that are at or above the Curtailment Threshold. However, the Reliability Coordinator should allow additional Interchange Transactions that flow across the Constrained Facility if their flow reduces the loading on the Constrained Facility or has a Transfer Distribution Factor less than the Curtailment Threshold. All Interchange Transactions using Firm Point-to-Point Transmission Service shall be allowed to start.

355 2.2.3. TLR Level 2 is a transient state, which requires a quick decision to proceed to higher TLR Levels (3 and above) to allow Interchange Transactions to be implemented according to their transmission reservation priority. The time for being in TLR Level 2 should be no more than 30 minutes, with the understanding that there may be  
360 circumstances where this time may be exceeded. If the time in TLR Level 2 exceeds 30 minutes, the Reliability Coordinator shall document this action on the TLR Log.

365 2.3. **TLR Level 3a – Reallocation of Transmission Service by curtailing Interchange Transactions using Non-firm Point-to-Point Transmission Service to allow Interchange Transactions using higher priority Transmission Service.**

2.3.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 3a:

- 370 • The transmission system is secure
- One or more transmission facilities are expected to approach, or are approaching, or are at their SOL or IROL
- Transactions using Non-firm Point-to-Point Transmission Service are flowing that are at or above the Curtailment Threshold on those facilities.
- 375 • The Transmission Provider has previously approved a higher priority Point-to-Point Transmission Service reservation over which a Transmission Customer wishes to begin an Interchange Transaction.

380 2.3.2. **Reallocation procedures to allow Interchange Transactions using higher priority Point-to-Point Transmission Service to start.** The Reliability Coordinator with the constraint shall give preference to those Interchange Transactions using Firm Point-to-Point Transmission Service, followed by those using higher  
385 priority Non-firm Point-to-Point Transmission Service as specified in Requirement 3. “Interchange Transaction Curtailment Order.” Interchange Transactions that have been held or curtailed as

- 390 prescribed in this Requirement shall be reallocated (reloaded) according to their Transmission Service priorities when operating conditions permit as specified in Requirement 6. “Interchange Transaction Reallocation During TLR Level 3a and 5a.”
- 2.3.2.1. The Reliability Coordinator shall displace Interchange Transactions with lower priority Transmission Service using Interchange Transactions having higher priority Non-firm or Firm Transmission Service.
- 395 2.3.2.2. The Reliability Coordinator shall not curtail Interchange Transactions using Non-firm Transmission Service to allow the start or increase of another Interchange Transaction having the same priority Non-firm Transmission Service.
- 400 2.3.2.3. If there are insufficient Interchange Transactions using Non-firm Point-to-Point Transmission Service that can be curtailed to allow for Interchange Transactions using Firm Point-to-Point Transmission Service to begin, the Reliability Coordinator shall proceed to TLR Level 5a.
- 405 2.3.2.4. The Reliability Coordinator shall reload curtailed Interchange Transactions prior to allowing the start of new or increased Interchange Transactions.
- 410 2.3.2.4.1. Interchange Transactions whose tags were submitted prior to the TLR Level 2 or Level 3a being called, but were subsequently held from starting, are considered to have been curtailed and thus would be reloaded the same time as the curtailed Interchange Transactions.
- 415 2.3.2.5. The Reliability Coordinator shall fill available transmission capability by reloading or starting eligible Transactions on a pro-rata basis.
- 420 2.3.2.6. The Reliability Coordinator shall consider transactions whose tags meet the approved -Tag submission deadline for Reallocation for the upcoming hour. Tags submitted after this deadline shall be considered for reallocation the following hour.
- 2.4. **TLR Level 3b – Curtail Interchange Transactions using Non-Firm Transmission Service Arrangements to mitigate a SOL or IROL Violation**



- 425 2.4.1. The Reliability Coordinator shall use the following circumstances  
to establish the need for entering TLR Level 3b:
- One or more transmission facilities are operating above their  
SOL or IROL, or
  - 430 • Such operation is imminent and it is expected that facilities will  
exceed their reliability limit unless corrective action is taken, or
  - One or more Transmission Facilities will exceed their SOL or  
IROL upon the removal from service of a generating unit or  
another transmission facility
  - 435 • Transactions using Non-firm Point-to-Point Transmission  
Service are flowing that are at or above the Curtailment  
Threshold on those facilities.

440 2.4.2. **Holding new Interchange Transactions.** The Reliability  
Coordinator shall hold all new Interchange Transactions using  
Non-firm Point-to-Point Transmission Service that are at or above  
the Curtailment Threshold during the period of the SOL or IROL  
Violation. The Reliability Coordinator shall allow Interchange  
Transactions using Firm Point-to-Point Transmission Service to  
start if they are submitted to the IDC within specific time limits as  
explained in Requirement 7. “Interchange Transaction  
445 Curtailments during TLR Level 3b.”

2.4.3. **Curtailment procedures to mitigate an SOL or IROL.** The  
Reliability Coordinator shall curtail Interchange Transactions using  
Non-firm Point-to-Point Transmission Service that are at or above  
the Curtailment Threshold as specified in Requirement 3.  
450 “Interchange Transaction Curtailment Order.”

2.5. **TLR Level 4 – Reconfigure Transmission**

- 2.5.1. The Reliability Coordinator shall use the following circumstances  
to establish the need for entering TLR Level 4:
- 455 • One or more Transmission Facilities are above their SOL or  
IROL, or
  - Such operation is imminent and it is expected that facilities will  
exceed their reliability limit unless corrective action is taken

460 2.5.2. **Holding new Interchange Transactions.** The Reliability  
Coordinator shall hold all new Interchange Transactions using  
Non-firm Point-to-Point Transmission Service that are at or above  
the Curtailment Threshold during the period of the SOL or IROL  
Violation. The Reliability Coordinator shall allow Interchange  
Transactions using Firm Point-to-Point Transmission Service to  
start if they are submitted to the IDC by 25 minutes past the hour

465 or the time at which the TLR Level 4 is called, whichever is later.  
See Appendix E, Section E2 - Timing Requirements.

470 2.5.3. **Reconfiguration procedures.** Following the curtailment of all  
Interchange Transactions using Non-firm Point-to-Point  
Transmission Service that are at or above the Curtailment  
Threshold in Level 3b that impact the Constrained Facilities, if a  
SOL or IROL violation is imminent or occurring, the Reliability  
Coordinator(s) shall request that the affected Transmission  
Operators reconfigure transmission on their system, or arrange for  
reconfiguration on other transmission systems, to mitigate the  
475 constraint. Specific details are explained in Requirement 4,  
“Principles for Mitigating Constraints On and Off the Contract  
Path”.

480 2.6. **TLR Level 5a – Reallocation of Transmission Service by curtailing  
Interchange Transactions using Firm Point-to-Point Transmission  
Service on a pro rata basis to allow additional Interchange  
Transactions using Firm Point-to-Point Transmission Service.**

2.6.1. The Reliability Coordinator shall use the following circumstances  
to establish the need for entering TLR Level 5a:

- 485 • The transmission system is secure
- One or more transmission facilities are at their SOL or IROL
- All Interchange Transactions using Non-firm Point-to-Point  
Transmission Service that are at or above the Curtailment  
Threshold have been curtailed.
- 490 • The Transmission Provider has been requested to begin an  
Interchange Transaction using previously arranged Firm  
Transmission Service that would result in a SOL or IROL  
violation.
- No further transmission reconfiguration is possible or effective.

495 2.6.2. **Reallocation procedures to allow new Interchange  
Transactions using Firm Point-to-Point Transmission Service  
to start.** The Reliability Coordinator shall use the following three-  
step process for reallocation of Interchange Transactions using  
Firm Point-to-Point Transmission Service:

500 2.6.2.1. **Step 1 – Identify available re-dispatch options.** The  
Reliability Coordinator shall assist the Transmission  
Operator(s) in identifying those known re-dispatch options  
that are available to the Transmission Customer that will  
mitigate the loading on the Constrained Facilities. If such  
re-dispatch options are deemed insufficient to mitigate

505 loading on the Constrained Facilities, the Reliability  
Coordinator shall proceed to implement these options while  
proceeding to Steps 2 and 3 below.

510 2.6.2.2.**Step 2** – The Reliability Coordinator shall calculate the  
percent of the overload on the Constrained Facility caused  
by both Firm Point-to-Point Transmission Service (at or  
above the Curtailment Threshold) and the Transmission  
Provider’s Network Integration Transmission Service and  
Native Load, as required by the Transmission Provider’s  
515 filed tariff. This is described in Requirement 5, “Parallel  
Flow Calculation Procedure for Reallocating or Curtailing  
Firm Transmission Service.”

520 2.6.2.3.**Step 3 – Curtail Interchange Transactions using Firm  
Transmission Service.** The Reliability Coordinator shall  
curtail or reallocate on a pro-rata basis (based on the MW  
level of the MW total to all such Interchange Transactions),  
those Interchange Transactions as calculated in  
Requirement 2.7.2.2 over the Constrained Facilities. (See  
also Requirement 6, “Interchange Transaction Reallocation  
525 during TLR 3a and 5a.” The Reliability Coordinator shall  
assist the Transmission Provider in curtailing Transmission  
Service to Network Integration Transmission Service  
customers and Native Load if such curtailments are  
required by the Transmission Provider’s tariff. Available  
re-dispatch options will continue to be implemented.

530 2.7. **TLR Level 5b – Curtail Interchange Transactions using Firm Point-  
to-Point Transmission Service to mitigate a SOL or IROL violation.**

2.7.1. The Reliability Coordinator shall use following circumstances to  
establish the need for entering TLR Level 5b:

- 535
- One or more Transmission Facilities are operating above their  
SOL or IROL, or
  - Such operation is imminent, or
  - One or more Transmission Facilities will exceed their SOL or  
IROL upon the removal from service of a generating unit or  
another transmission facility.
  - 540 • All Interchange Transactions using Non-firm Point-to-Point  
Transmission Service that are at or above the Curtailment  
Threshold have been curtailed.
  - No further transmission reconfiguration is possible or effective.

545 2.7.2. The Reliability Coordinator shall use the following three-step process for curtailment of Interchange Transactions using Firm Point-to-Point Transmission Service:

550 2.7.2.1. **Step 1 – Identify available re-dispatch options.** The Reliability Coordinator shall assist the Transmission Operator(s) in identifying those known re-dispatch options that are available to the Transmission Customer that will mitigate the loading on the Constrained Facilities. If such re-dispatch options are deemed insufficient to mitigate loading on the Constrained Facilities, the Reliability Coordinator shall proceed to implement these options while  
555 proceeding to Steps 2 and 3 below.

560 2.7.2.2. **Step 2** – The Reliability Coordinator shall calculate the percent of the overload on the Constrained Facility caused by both, Firm Point-to-Point Transmission Service (at or above the Curtailment Threshold) and the Transmission Provider’s Network Integration Transmission Service and Native Load, as required by the Transmission Provider’s filed tariff. This is described in Requirement 5, “Parallel Flow Calculation Procedure for Reallocating or Curtailing Firm Transmission Service.”

565 2.7.2.3. **Step 3 – Curtailment of Interchange Transactions using Firm Transmission Service.** At this point, the Reliability Coordinator shall begin the process of curtailing Interchange Transactions as calculated in Requirement  
570 2.7.2.2 over the Constrained Facilities using Firm Point-to-Point Transmission Service until the SOL or IROL violation has been mitigated. The Reliability Coordinator shall assist the Transmission Provider in curtailing Transmission Service to Network Integration Transmission Service customers and Native Load if such curtailments are  
575 required by the Transmission Providers’ tariff. Available re-dispatch options will continue to be implemented.

2.8. **TLR Level 6 – Emergency Procedures**

2.8.1. The Reliability Coordinator shall use following circumstances to establish the need for entering TLR Level 6:

- 580
- One or more Transmission Facilities are above their SOL or IROL.

- One or more Transmission Facilities will exceed their SOL or IROL upon the removal from service of a generating unit or another transmission facility.

585

2.8.2. **Implementing emergency procedures.** If the Reliability Coordinator deems that transmission loading is critical to bulk system reliability, the Reliability Coordinator shall immediately direct the Balancing Authorities and Transmission Operators in its Reliability Area to re-dispatch generation, or reconfigure transmission, or reduce load to mitigate the critical condition until Interchange Transactions can be reduced utilizing the TLR Procedures or other procedures to return the system to a secure state. All Balancing Authorities and Transmission Operators shall comply with all requests from their Reliability Coordinator.

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595

2.9. **TLR Level 0 – TLR concluded**

2.9.1. **Interchange Transaction restoration and notification procedures.** The Reliability Coordinator initiating the TLR Procedure shall notify all Reliability Coordinators within the Interconnection via the RCIS when the SOL or IROL violations are mitigated and the system is in a “normal” state, allowing Interchange Transactions to be re-established at its discretion. Those with the highest transmission priorities shall be re-established first if possible.

600

605

3. **Interchange Transaction Curtailment Order for use in TLR Procedures**

3.1. **Priority of Interchange Transactions**

610 3.1.1. Interchange Transaction curtailment priority shall be determined by the Transmission Service reserved over the constrained facility(ies) as follows:

**Transmission Service Priorities**

- 615 Priority 0. Next-hour Market Service – NX\*
- Priority 1. Service over secondary receipt and delivery points – NS
- Priority 2. Non-Firm Point-to-Point Hourly Service – NH
- Priority 3. Non-Firm Point-to-Point Daily Service – ND
- Priority 4. Non-Firm Point-to-Point Weekly Service – NW
- Priority 5. Non-Firm Point-to-Point Monthly Service – NM
- 620 Priority 6. Network Integration Transmission Service from sources not designated as network resources – NN
- Priority 7. Firm Point-to-Point Transmission Service – F and Network Integration Transmission Service from Designated Resources – FN

625 3.1.2. The curtailment priority for Interchange Transactions that do not have a Transmission Service reservation over the constrained facility(ies) shall be defined by the lowest priority of the individual reserved transmission segments.

630 3.2. **Curtailment of Interchange Transactions Using Non-firm Transmission Service**

635 3.2.1. The Reliability Coordinator shall direct the curtailment of Interchange Transactions using Non-firm Transmission Service that are at or above the Curtailment Threshold for the following TLR Levels:

3.2.1.1. **TLR Level 3a.** Enable Interchange Transactions using a higher Transmission reservation priority to be implemented, or

3.2.1.2. **TLR Level 3b.** Mitigate a SOL or IROL violation.

640 3.3. **Curtailment of Interchange Transactions Using Firm Transmission Service**

3.3.1. The Reliability Coordinator shall direct the curtailment of Interchange Transactions using Firm Transmission Service that are

at or above the Curtailment Threshold for the following TLR Levels:

645

3.3.1.1. **TLR Level 5a.** Enable additional Interchange Transactions using Firm Point-to-Point Transmission Service to be implemented after all Interchange Transactions using Non-firm Point-to-Point Service have been curtailed, or

650

3.3.1.2. **TLR Level 5b.** Mitigate a SOL or IROL violation that remains after all Interchange Transactions using Non-firm Transmission Service has been curtailed under TLR Level 3b, and following attempts to reconfigure transmission under TLR Level 4.

#### 4. Mitigating Constraints On and Off the Contract Path during TLR

##### 655 Introduction

Reserving transmission service for an Interchange Transaction along a “contract path” may not reflect the actual distribution of the power flows over the transmission network from generation source to load sink. Interchange Transactions arranged over a contract path may, therefore, overload transmission elements on other electrically parallel paths.

660

The curtailment priority of an Interchange Transaction depends on whether the Constrained Facility is on or off the contract path as detailed below.

##### 4.1. Constraints On the Contract Path

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4.1.1. The Reliability Coordinator initiating TLR shall consider the entire Interchange Transaction non-firm if the transmission link (i.e. a segment on the Contract Path) on the Constrained Facility is Non-firm Point-to-Point Transmission Service, even if other links in the contract path are firm. When the Constrained Facility is on the contract path, the Interchange Transaction takes on the transmission service priority of the Transmission Service link with the Constrained Facility regardless of the Transmission Service priority on the other links along the contract path.

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675

**Discussion.** The Transmission Operator simply has to call its Reliability Coordinator, request the TLR Procedure be initiated, and allow the curtailments of all Interchange Transactions that are at or above the Curtailment Threshold to progress until the relief is realized. Firm Point-to-Point Transmission Service links elsewhere in the contract path do not obligate Transmission Providers providing Non-firm Point-to-Point Transmission Service to treat the transaction as firm. For curtailment purposes, the Interchange Transaction’s priority will be the priority of the Transmission Service link with the Constrained Facility. (See Requirement 4.1.2 below.)

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4.1.2. The Reliability Coordinator initiating TLR shall consider the entire Interchange Transaction firm if the transmission link on the Constrained Facility is Firm Point-to-Point Transmission Service, even if other links in the contract path are non-firm.

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**Discussion.** The curtailment priority of an Interchange Transaction on a contract path link is not affected by the transmission service priorities arranged with other links on the contract path. If the Constrained Facility is on a Firm Point-to-Point Transmission Service contract path link, then the curtailment priority of the Interchange Transaction is considered firm regardless of the

695



transmission service arrangements elsewhere on the contract path. If the Transmission Provider provides its services under the FERC pro forma tariff, it may also be obligated to offer its Transmission Customer alternate receipt and delivery points, thus allowing the Customer to curtail its Transmission Service over the Constrained Facilities.

700

4.2. **Constraints Off the Contract Path**

4.2.1. The Reliability Coordinator initiating TLR shall consider the entire Interchange Transaction non-firm if none of the transmission links on the contract path are on the Constrained Facility and if any of the transmission links on the contract path are Non-firm Point-to-Point Transmission Service; the Interchange Transaction shall take on the lowest transmission service priority of all Transmission Service links along the contract path.

705

710

**Discussion.** An Interchange Transaction arranged over a contract path where one or more individual links consist of Non-firm Point-to-Point Transmission Service is considered to be a non-firm Interchange Transaction for Constrained Facilities off the contract path. Sufficient Interchange Transactions that are at or above the Curtailment Threshold will be curtailed before any Interchange Transactions using Firm Point-to-Point Transmission Service are curtailed. The priority level for curtailment purposes will be the lowest level of transmission service arranged for on the contract path.

715

720

4.2.2. The Reliability Coordinator initiating TLR shall consider the entire Interchange Transaction firm if all of the transmission links on the contract path are Firm Point-to-Point Transmission Service, even if none of the transmission links are on the Constrained Facility, and shall not be curtailed to relieve a Constraint off the contract path until all non-firm Interchange Transactions that are at or above the Curtailment Threshold have been curtailed.

725

**Discussion.** If the entire contract path is Firm Point-to-Point Transmission Service, then the TLR procedure will treat the Interchange Transaction as firm even for Constraints off the contract path and will not curtail that Interchange Transaction until all non-firm Interchange Transactions that are at or above the Curtailment Threshold have been curtailed. However, Transmission Providers off the contract path are not obligated to reconfigure their transmission system or provide other congestion management procedures unless special arrangements are in place. Because the Interchange Transaction is considered firm “everywhere,” the Reliability Coordinator may attempt to arrange

730

735

740 for Transmission Operators to reconfigure transmission or provide  
other congestion management options or Balancing Authorities to  
745 redispatch, even if they are off the contract path, to try to avoid  
curtailing the Interchange Transaction that is using the Firm Point-  
to-Point Transmission Service.

## 5. Parallel Flow Calculation Procedure for Reallocating or Curtailing Firm Transmission Service during TLR

### Introduction

750 The provision of Point-to-Point (PTP) transmission service, Network Integration (NI)  
transmission service and service to Native Load (NL) results in parallel flows on the  
transmission network of other Transmission Operators. When a transmission facility  
becomes constrained curtailment of Interchange Transactions is required to allow  
755 Interchange Transactions of higher priority to be scheduled (Reallocation) or to provide  
transmission loading relief (Curtailment). An Interchange Transaction is considered for  
Reallocation or Curtailment if its Transfer Distribution Factor (TDF) exceeds the TLR  
Curtailment Threshold.

In compliance with Transmission Service Provider tariffs, Interchange Transactions using  
760 Non-firm PTP transmission service are curtailed first (TLR Level 3a and 3b), followed by  
transmission reconfiguration (TLR Level 4), and then the curtailment of Interchange  
Transactions using Firm PTP transmission service, NI transmission service and service to  
NL (TLR Level 5a and 5b). Curtailment of Firm PTP transmission service shall be  
765 accompanied by the comparable curtailment of NI transmission service and service to NL  
to the degree that these three transmission services contribute to the Constraint.

### 5.1. Requirements

A methodology, called the Per Generator Method without Counter Flow, or  
simply the Per Generator Method, has been programmed into the IDC to calculate  
770 the portion of parallel flows on any Constrained Facility due to service to NL of  
each Balancing Authority. The following requirements are necessary to assure  
comparable Reallocation or Curtailment of firm transmission service:

- 775 5.1.1. The Reliability Coordinator initiating a curtailment shall identify  
for curtailment all firm transmission services (i.e. PTP, NI and  
service to NL) that contribute to the flow on any Constrained  
Facility by an amount greater than or equal to the Curtailment  
Threshold on a pro rata basis.
- 780 5.1.2. For Firm PTP transmission services, the Transfer Distribution  
Factors (TDFs) must be greater than or equal to the Curtailment  
Threshold.
- 5.1.3. For NI transmission service and service to NL, the GLDFs must be  
greater than or equal to the Curtailment Threshold.
- 785 5.1.4. The Per Generator Method shall assign the amount of Constrained  
Facility relief that must be achieved by each Balancing Authority's  
NI transmission service or service to NL. It shall not specify how  
the reduction will be achieved.

5.1.5. All Balancing Authorities in the Eastern Interconnection shall be obligated to achieve the amount of Constrained Facility relief assigned to them by the Per Generator Method.

790

5.1.6. The implementation of the Per Generator Method shall be based on transmission and generation information that is readily available.

**5.2. Calculation Method**

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The calculation of the flow on a Constrained Facility due to NI transmission service or service to NL shall be based on the GSFs of a Balancing Authority's assigned generation and the LSFs of its native load, relative to the system swing bus. The GSFs shall be calculated from a single bus location in the IDC. The IDC shall report all generators assigned to native load for which the GLDF is greater than or equal to the Curtailment Threshold.

800 6. **Interchange Transaction Reallocation During TLR Levels 3a and 5a**

**Introduction**

This requirement provides the details for implementing TLR Levels 3a and 5a, both of which provide a means for reallocation of Transmission Service.

805 **TLR Level 3a** accomplishes Reallocation by curtailing Interchange Transactions using Non-firm Point-to-Point Transmission Service to allow Interchange Transactions using higher priority Non-firm or Firm Point-to-Point Transmission Service to start. (See **Requirement 2.3, “TLR Level 3a.”**) When a TLR Level 3a is in effect, Reliability Coordinators shall reallocate interchange transactions according to the Transactions’  
810 transmission service priorities. Reallocation also includes the orderly reloading of Transactions by priority when conditions permit curtailed Transactions to be reinstated.

**TLR Level 5a** accomplishes Reallocation by curtailing Interchange Transactions using Firm Point-to-Point Transmission Service on a pro-rata basis to allow new Interchange  
815 Transactions using Firm Point-to-Point Transmission Service to begin, also on a pro-rata basis. (See **Requirement 2.6, “TLR Level 5a.”**)

6.1. **Requirements**

The basic requirements for Transaction Reallocation are as follows:

820

6.1.1. When identifying transactions for Reallocation the Reliability Coordinator shall normally only involve curtailments of Interchange Transactions using Non-firm Point-to-Point Transmission Service during TLR 3a. However, Reallocation may  
825 be used during TLR 5a to allow the implementation of additional Interchange Transactions using Firm Transmission Service on a pro-rata basis.

825

6.1.2. When identifying transactions for Reallocation, the Reliability Coordinator shall only consider those Interchange Transactions at or above the Curtailment Threshold for which a TLR 2 or higher is called.  
830

830

6.1.3. When identifying transactions for Reallocation, the Reliability Coordinator shall displace Interchange Transactions utilizing lower priority transmission service with Interchange Transactions  
835 utilizing higher transmission service priority.

835

6.1.4. When identifying transactions for Reallocation, the Reliability Coordinator shall not curtail Interchange Transactions using Non-firm Transmission Service to allow the start or increase of another

840 transaction having the same Non-Firm Transmission Service  
priority (marginal “bucket”).

6.1.5. When identifying transactions for Reallocation, the Reliability  
Coordinator shall reload curtailed Interchange Transactions prior  
to starting new or increasing existing Interchange Transactions.

845 6.1.6. Interchange Transactions whose tags were submitted prior to the  
TLR 2 or 3a being called, but were subsequently held from starting  
because they failed to meet the approved Tag submission deadline  
for Reallocation (**see Requirement 6.2, “Communications and  
Timing Requirements”**), shall be considered to have been  
850 curtailed and thus would be eligible for reload at the same time as  
the curtailed Interchange Transaction.

6.1.7. The Reliability Coordinator shall reload or start all eligible  
Transactions on a pro-rata basis.

855 6.1.8. Interchange Transactions whose tags meet the approved Tag  
submission deadline for Reallocation (**see Requirement 6.2,  
“Communications and Timing Requirements”**) shall be  
considered for reallocation for the upcoming hour. (However,  
Interchange Transactions using Firm Point-to-Point Transmission  
Service shall be allowed to start as scheduled.) Interchange  
860 Transactions whose tags are submitted to the IDC after the  
approved Tag submission deadline for Reallocation shall be  
considered for Reallocation the following hour. This applies to  
Interchange Transactions using either Non-firm Point-to-Point  
Transmission Service or Firm Point-to-Point Transmission Service.  
865 If an Interchange Transaction using Firm Interchange Transaction  
is submitted after the approved Tag submission deadline and after  
the TLR is declared, that Transaction shall be held and then  
allowed to start in the upcoming hour.

870 It should be noted that calling a TLR 3a does not necessarily mean that  
Interchange Transactions using Non-firm Transmission Service will  
always be curtailed the next hour. However, TLR Levels 3a and 5a trigger  
the approved Tag submission deadline for Reallocation requirements and  
allow for a coordinated assessment of all Interchange Transactions tagged  
to start the upcoming hour.

875 6.2. **Communication and Timing Requirements**

The following timeline shall be utilized to support Reallocation decisions during TLR Levels 3a or 5a. See Figures 2 and 3 for a depiction of the Reallocation Time Line.

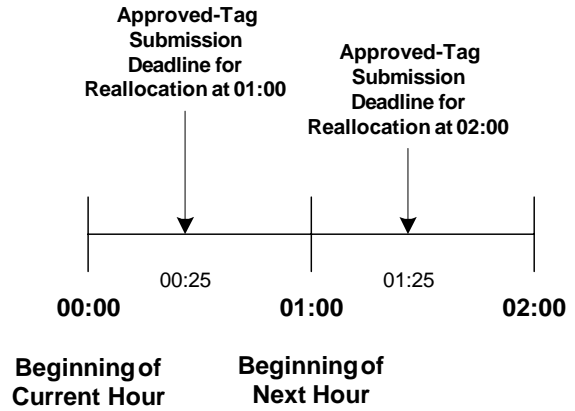
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6.2.1. **Time Convention.** In this document, the beginning of the current hour shall be referenced as 00:00.

885

The beginning of the next hour shall be referenced as 01:00. The end of the next hour shall be referenced as 02:00. See Figure 1.

890



**Figure 1 - Timeline showing approved-Tag submission deadline for Reallocation**

6.2.2. **Approved Tag Submission Deadline for Reallocation.**

895

Reliability Coordinators shall consider all approved Tags for Interchange Transactions at or above the Curtailment Threshold that have been submitted to the IDC by 00:25 for Reallocation at 01:00. See Figure 1. However, Interchange Transactions using Firm Point-to-Point Transmission Service will be allowed to start as scheduled.

900

6.2.2.1. Reliability Coordinators shall consider all approved tags submitted to the IDC beyond these deadlines for reallocation at 02:00 (for both Firm and Non-firm Point-to-Point Transmission Service). However, these Interchange Transactions will not be allowed to start or increase at 01:00.

905

6.2.2.2. The approved Tag submission deadline for Reallocation shall cease to be in effect as soon as the TLR level is reduced to 1 or 0.

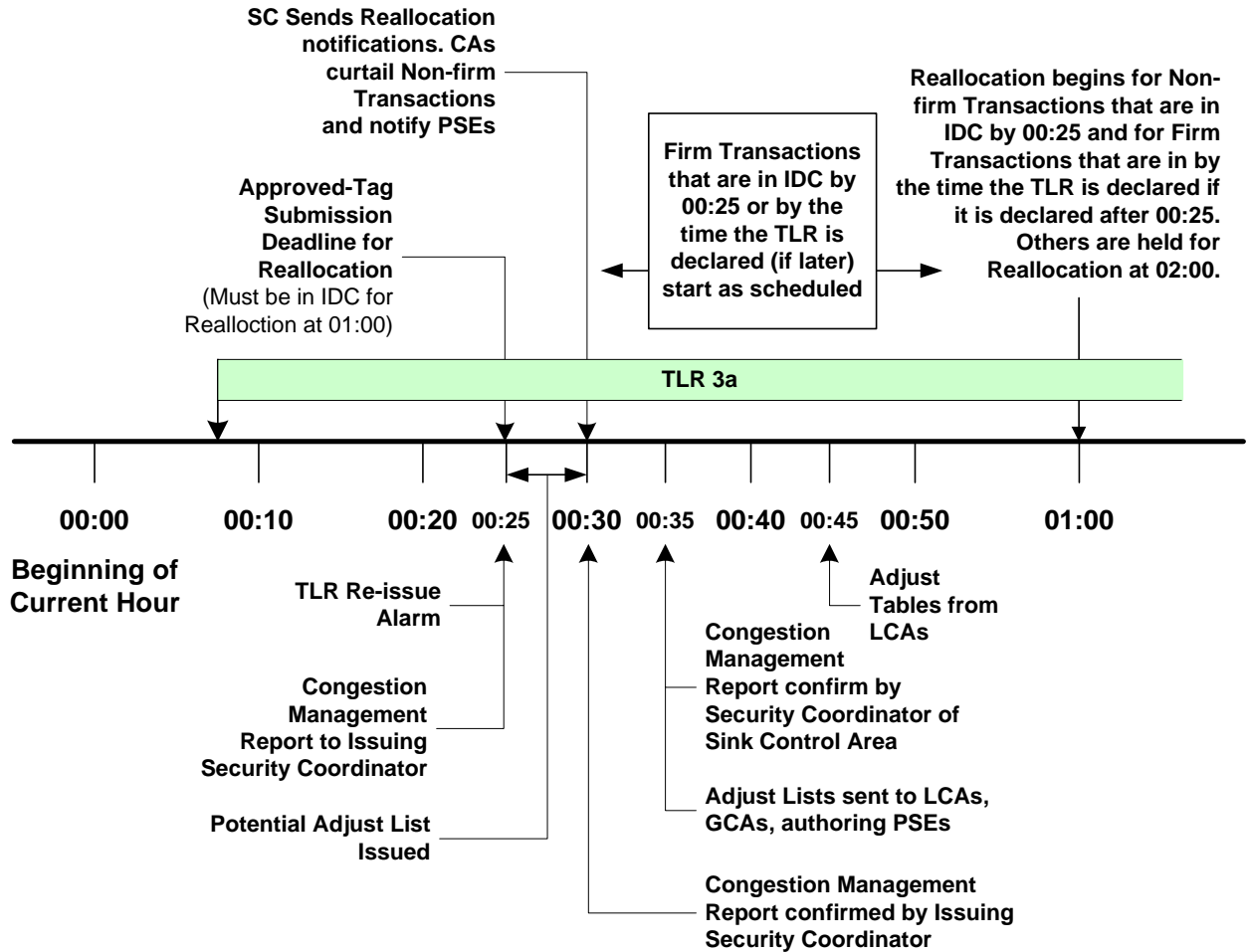


Figure 2 - Reallocation timing for TLR 3a called at 00:08.

910

6.2.3. **Off-hour Transactions.** Interchange Transactions with a Start Time other than  $xx:00$  shall be considered for Reallocation at  $xx+1:00$ . For example, an Interchange Transaction with a start time of 01:05 and whose Tag was submitted at 00:15 will be considered for Reallocation at 02:00.

915

6.2.4. **Tag Evaluation Period.** Balancing Authorities and Transmission Providers shall evaluate all tags submitted for reallocation and shall communicate approval or rejection by 00:25.

920

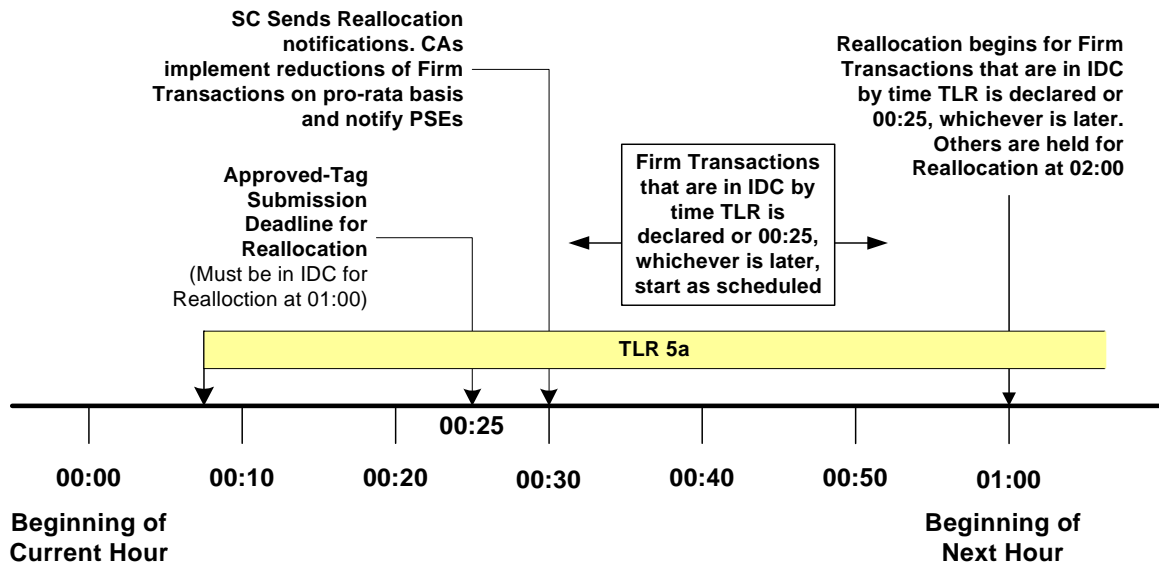
6.2.5. **Collective Scheduling Assessment Period.** At 00:25, the initiating Reliability Coordinator (the one who called and still has a TLR 3a or 5a in effect) shall run the IDC to obtain a three-part list of Interchange Transactions including their transaction status:



925 6.2.5.1. Interchange Transactions that may start, increase, or reload shall have a status of PROCEED,

930 6.2.5.2. Interchange Transactions that must be curtailed or Interchange Transactions whose tags were submitted prior to the TLR 2 or higher being declared but were not permitted to start or increase shall have a status of CURTAILED, and

935 6.2.5.3. Interchange Transactions that are entered into the IDC after 00:25 shall have a status of HOLD<sup>2</sup> and be considered for Reallocation at 02:00. Also, Interchange Transactions using Non-firm Point-to-Point Transmission Service submitted after TLR 2 or higher was declared (“post-tagged”) but have not been allowed to start shall retain the HOLD status until given permission to PROCEED or E-Tag expires. (Note: TLR Level 2 does not hold Interchange Transactions using Firm Point-to-Point Transmission Service).



940 **Figure 3 - Reallocation timing for TLR 5a called at 00:08.**

945 6.2.5.4. The initiating Reliability Coordinator shall communicate the list to the appropriate sink Reliability Coordinators via the IDC, who shall in turn communicate the list to the Sink Balancing Authorities at 00:30 for appropriate actions to

<sup>2</sup> The use of PROCEED, CURTAILED, and HOLD refer to an Interchange Transaction status in the IDC, not the E-tag status.

950 implement Interchange Transactions (CURTAIL,  
PROCEED or HOLD). The IDC will prompt the initiating  
Reliability Coordinator to input the necessary information  
(i.e., maximum flowgate loading and curtailment  
requirement) into the IDC by 00:25.

955 6.2.5.5. Subsequent required reports before 01:00 shall allow the  
Reliability Coordinators to include those Interchange  
Transactions whose tags were submitted to the IDC after  
the Approved-Tag Submission Time for Reallocation and  
were given the HOLD status (not permitted to PROCEED).  
960 Transactions at or above the Curtailment Threshold that are  
not indicated as “PROCEED” on Reload/Reallocation  
Report shall not be permitted to start or increase the next  
hour.

965 **Discussion:** Note that TLR 2 does not initiate the approved  
Tag submission deadline for Reallocation, but a TLR3a or  
5a does. It is, however, important to recognize the time  
when a TLR 2 is called, where applicable, to determine the  
status of a held transaction – “CURTAILED” if tagged  
before the TLR was called but “HOLD” if tagged after the  
TLR was called.

970 6.2.5.6. In running the IDC, the Reliability Coordinator shall have  
an option to specify the maximum loading of the  
Constrained Facility by all Interchange Transactions using  
Point-to-Point Transmission Service.

975 **Discussion:** This allows the Reliability Coordinator to take  
into consideration SOLs or IROLs and changes in  
Transactions using other than point-to-point service taken  
under the OATT. This option is needed to avoid loading the  
Constrained Facility to its limit with known Interchange  
Transactions while other factors push the facility into a  
SOL or IROL violation and hence triggering the declaration  
of a TLR 3b or 5b.

980 6.2.5.7. Notification of Interchange Transaction status shall be  
provided from the IDC to the Reliability Coordinators via  
an IDC Report. The Reliability Coordinators shall  
communicate this information to the Balancing Authorities  
and Transmission Operators.

985 Additional reporting and communications details on  
information posted from the IDC to the NERC TLR site are  
contained in Appendix E.

6.2.6. **Customer Preferences on Timing to Call TLR 3a or 5a.**

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Reliability Coordinators shall leave a TLR 2 and call a TLR 3a as soon as possible (but no later than 30 minutes) to initiate the approved Tag submission deadline and start reallocating Transactions. Nevertheless, recognizing the approved Tag submission deadline for Reallocation, from a Transmission Customer perspective, it is preferable that the Reliability Coordinator call a TLR 3a within a certain time period to allow for tag preparation and submission. See Figure 4.

995

**Discussion:** A Reliability Coordinator calls a TLR 2 or 3a whenever it deems necessary to indicate that a transmission facility is approaching its SOL or IROL. It is envisioned, though not required, that a TLR 2 or 3a is preceded by a period of a TLR 1 declaration, hence Transmission Customers should normally have advance notice of a potential constraint. For example, a TLR 3a initiated during the period 01:00 to 01:25 would allow the Purchasing-Selling Entity to submit a Tag for entry into the IDC by the approved Tag submission deadline for Reallocation at 02:00. See Figure 4. However, the preferred time period to declare a TLR 3a or 5a would be between 00:40 (when tags for Next Hour Market have been submitted) and 01:15. This will allow the Transmission Customers a range of 15 to 35 minutes to prepare and submit tags. (Note: In this situation, the Reliability Coordinator would need to reissue the TLR 3a at 01:00.)

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It must be emphasized that the preferred time period is not a requirement, and should not in any way impede a Reliability Coordinator's ability to declare a TLR 3a, 3b, 4, 5a, or 5b whenever the need arises.

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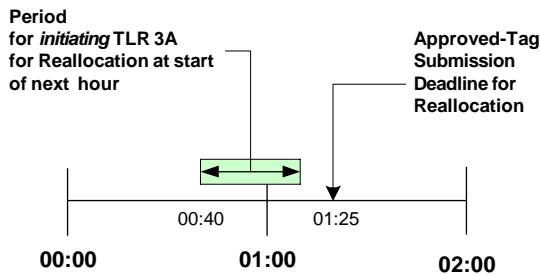


Figure 4. "Ideal" time for issuing TLR 3a for Reallocation at 02:00.

1025 7. **Interchange Transaction Curtailments During TLR Level 3b**

**Introduction**

This requirement provides the details for implementing TLR Level 3b, which curtails Interchange Transactions using Non-firm Point-to-Point Transmission Service to assist the Reliability Coordinator to recover from SOL or IROL violations.

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TLR Level 3b curtails Interchange Transactions using Non-firm Point-to-Point Transmission Service that are at or above the Curtailment Threshold. (See **Requirement 2.4, “TLR Level 3b.”**) Furthermore, *all* new Interchange Transactions using Non-firm Point-to-Point Transmission Service that are at or above the Curtailment Threshold during the TLR 3b implementation period are halted or held. Transactions using Firm Point-to-Point Transmission Service will be allowed to start if they are submitted to the IDC within specific time limits as explained in Appendix F, “Considerations for Interchange Transactions using Firm Point-to-Point Transmission Service.” Those Interchange Transactions using Firm Point-to-Point Transmission Service that are not submitted to the IDC within these time limits will be held.

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**Requirements**

7.1. The Reliability Coordinator shall be allowed to call a TLR 3b at any time to help mitigate a SOL or IROL violation.

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7.2. The Reliability Coordinator shall consider only those Interchange Transactions at or above the Curtailment Threshold for curtailment, holding, or halting.

7.3. The Reliability Coordinator shall curtail existing Interchange Transactions using Non-firm Point-to-Point Transmission Service as necessary to provide the required relief on the Constrained Facility.

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7.4. The Reliability Coordinator shall curtail additional Interchange Transactions using Non-firm Point-to-Point Transmission Service to provide transmission capacity for Interchange Transactions using Firm Point-to-Point Transmission Service if those Interchange Transactions using Firm Point-to-Point Transmission Service are scheduled to start during the current hour or the following hour.

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7.5. The Reliability Coordinator shall not allow existing Interchange Transactions using Non-firm Point-to-Point Transmission Service that are not curtailed to increase (they may flow at the same or reduced level).

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7.6. The Reliability Coordinator shall not reallocate Interchange Transactions using Non-firm Point-to-Point Transmission Service during a TLR 3b.

- 7.7. The Reliability Coordinator shall allow Interchange Transactions using Firm Point-to-Point Transmission Service to start as explained in Appendix F, “Considerations for Interchange Transactions using Firm Point-to-Point Transmission Service.”
- 1065 7.8. The Reliability Coordinator shall progress to TLR Level 5b as necessary if there is still insufficient transmission capacity for Interchange Transactions using Firm Point-to-Point Transmission Service to start as scheduled after all Interchange Transactions using Non-firm Point-to-Point Transmission Service have been curtailed.
- 1070 7.9. The IDC shall issue ADJUST Lists to the Generation and Load Control Areas and the Purchasing-Selling Entity who submitted the tag. The ADJUST List will include:
- 1075 7.9.1. Interchange Transactions using Non-firm Point-to-Point Transmission Service that are to be curtailed, halted, or held during current and next hours.
- 7.9.2. Interchange Transactions using Firm Point-to-Point Transmission Service that were entered after 00:25 or issuance of TLR 3b (see Case 3 in Appendix F).
- 1080 7.10. The Sink Balancing Authority shall send the ADJUST Lists back to the IDC as soon as possible to ensure the most accurate calculations for actions subsequent to the TLR 3b being called.
- 7.11. The Reliability Coordinator shall be allowed to call a TLR Level 3a as soon as the SOL or IROL violation which caused the TLR 3b to be called has been mitigated.
- 1085 7.11.1. If the TLR Level 3a is called before the hour 01, then a Reallocation shall be computed for the start of that hour.
- 7.11.2. Transactions must be in the IDC by the approved Tag submission deadline for Reallocation (see Requirement 6.2).

**Appendices for NAESB Transmission Loading Relief Standard**

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Appendix A. Transaction Management and Curtailment Process

Appendix B. Transaction Curtailment Formula

Appendix C. Sample NERC Transmission Loading Relief Procedure Log

Appendix D. Examples for Parallel Flow Calculation Procedure for Reallocating or

1095 Curtailing Firm Transmission Service

Appendix E. How the IDC Handles Reallocation

Section E1: Summary of IDC Features that Support Transaction

Reloading/Reallocation

Section E2: Timing Requirements

1100 Appendix F. Considerations for Interchange Transactions using Firm Point-to-Point  
Transmission Service

Appendix G. Examples of On-Path and Off-Path Mitigation

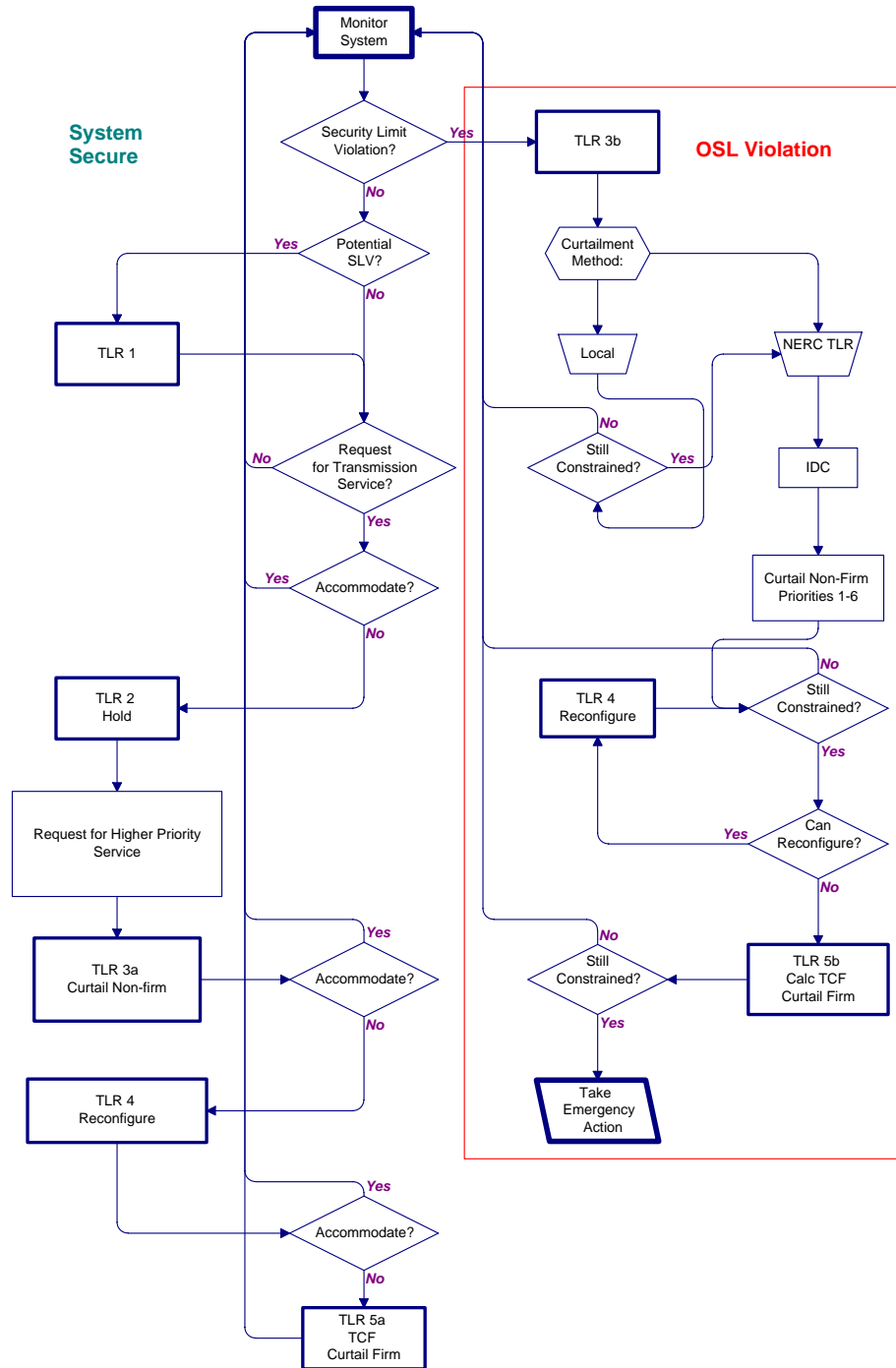
1105

# Appendix A

## Transaction Management and Curtailment Process

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This flowchart depicts an overview of the Transaction Management and Curtailment process. Detailed decisions are not shown.



## Appendix B

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### Transaction Curtailment Formula

*Example*

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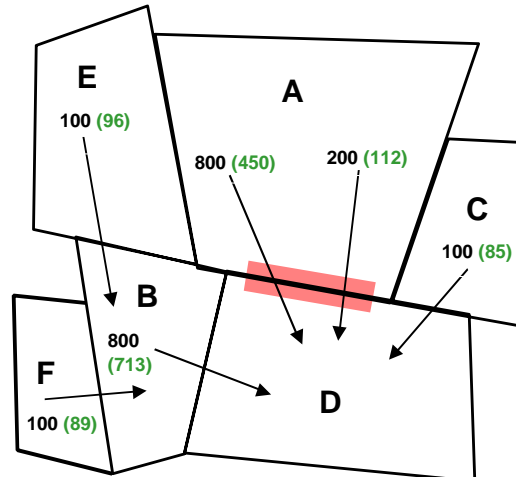
This example is based on the premise that a transaction should be curtailed in proportion to its TDF on the Constraints. Its effect on the interface is a combination of its size in MW and its effect based on its distribution factor.

<i>Column</i>	<i>Description</i>
1. Initial Transaction	Interchange Transaction before the TLR Procedure is implemented.
2. Distribution Factor	Proportional effect of the Transaction over the constrained interface due to the physical arrangement and impedance of the transmission system.
3. Impact on the Interface	Result of multiplying the Transaction MW by the distribution factor. This yields the MW that flow through the constrained interface from the Transaction. Performing this calculation for each Transaction yields the total flow through the constrained interface from all the Interchange Transactions. In this case, 760 MW.
4. Impact Weighting Factor	“Normalization” of the total of the Distribution Factors in Column 2. Calculated by dividing the Distribution Factor for each Transaction by the total of the Distribution Factors.
5. Weighted Maximum Interface Reduction	Multiplying the Impact on the Interface from each Transaction by its Impact Weighting Factor yields a new proportion that is a combination of the MW Impact on the Interface and the Distribution Factor.
6. Interface Reduction	Multiplying the amount we need to reduce the flow over the constrained interface (280 MW) by the normalization of the Weighted Maximum Interface Reduction yields the actual MW reduction that each Transaction must <i>contribute</i> to achieve the total reduction.
7. Transaction Reduction	Now we have to divide by the Distribution Factor to see how much the Transaction must be reduced to yield the result we calculated in Column 7. Note that the reductions for the first two Interchange Transactions (A-D (1) and A-D (2) are in proportion to their size since their distribution factors are equal.
8. New Transaction Amount	Subtracting the Transaction Reduction from the Initial



	Transaction yields the New Transaction Amount.
9. Adjusted Impact on Interface	A check to ensure the new constrained interface MW flow has been reduced to the target amount.

Allocation based on Weighted Impact									
	1	2	3	4	5	6	7	8	9
Transaction ID	Initial Transaction	Distribution Factor	(1)*(2) Impact On Interface	(2)/(2TOT) Impact weighting factor	(3)*(4) Weighted Max Interface Reduction	(5)*(Relief Requested) / (5 Tot) Interface Reduction	(6)/(2) Transaction Reduction	(1)-(7) New Transaction Amount	(8)*(2) Adjusted Impact On Interface
<b>Example 1</b>									
A-D(1)	800	0.6	480	0.34	164.57	209.73	349.54	450.46	270.27
A-D(2)	200	0.6	120	0.34	41.14	52.43	87.39	112.61	67.57
B-D	800	0.15	120	0.09	10.29	13.11	87.39	712.61	106.89
C-D	100	0.2	20	0.11	2.29	2.91	14.56	85.44	17.09
E-B	100	0.05	5	0.03	0.14	0.18	3.64	96.36	4.82
F-B	100	0.15	15	0.09	1.29	1.64	10.92	89.08	13.36
	<b>2100</b>	<b>1.75</b>	<b>760</b>		<b>219.71</b>	<b>280.00</b>	<b>553.45</b>	<b>1546.55</b>	<b>480.00</b>
<b>Example 2</b>									
A-D(1)	1000	0.6	600	0.52	313.04	262.16	436.93	563.07	337.84
B-D	800	0.15	120	0.13	15.65	13.11	87.39	712.61	106.89
C-D	100	0.2	20	0.17	3.48	2.91	14.56	85.44	17.09
E-B	100	0.05	5	0.04	0.22	0.18	3.64	96.36	4.82
F-B	100	0.15	15	0.13	1.96	1.64	10.92	89.08	13.36
	<b>2100</b>	<b>1.15</b>	<b>760</b>		<b>334.35</b>	<b>280.00</b>	<b>553.45</b>	<b>1546.55</b>	<b>480.00</b>
<b>Example 3</b>									
A-D(1A)	200	0.6	120	0.17	20.28	52.43	87.39	112.61	67.57
A-D(1B)	200	0.6	120	0.17	20.28	52.43	87.39	112.61	67.57
A-D(1C)	200	0.6	120	0.17	20.28	52.43	87.39	112.61	67.57
A-D(1D)	200	0.6	120	0.17	20.28	52.43	87.39	112.61	67.57
A-D(2)	200	0.6	120	0.17	20.28	52.43	87.39	112.61	67.57
B-D	800	0.15	120	0.04	5.07	13.11	87.39	712.61	106.89
C-D	100	0.2	20	0.06	1.13	2.91	14.56	85.44	17.09
E-B	100	0.05	5	0.01	0.07	0.18	3.64	96.36	4.82
F-B	100	0.15	15	0.04	0.63	1.64	10.92	89.08	13.36
	<b>2100</b>	<b>3.55</b>	<b>760</b>		<b>108.31</b>	<b>280.00</b>	<b>553.45</b>	<b>1546.55</b>	<b>480.00</b>



# Appendix C

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## Sample NERC Transmission Loading Relief

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SAVE FILE DIRECTORY: \_\_\_\_\_

**NERC TRANSMISSION LOADING RELIEF (TLR) PROCEDURE LOG**

FILE SAVED AS: .XLS

<b>INCIDENT :</b>	<b>DATE:</b>	<b>IMPACTED SECURITY COORDINATOR :</b>	<b>ID NO:</b>
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**INITIAL CONDITIONS**

Limiting Flowgate (LIMIT)	Rating	Contingent Flowgate (CONT.)	ODF
<b>TLR Levels</b> 0: TLR Incident Canceled 1. Notify Security Coordinators of potential problems. 2: Halt additional transactions that contribute to the overload 3a and 3b: Curtail transactions using Non-firm Transmission Service 4. Reconfigure to continue firm transactions if needed. 5a and 5b: Curtail Transactions using Firm Transmission Service. 6: Implement emergency procedures.	<b>Priorities</b> NX Next Hour Market Service NS Service over secondary receipt and delivery points NH Hourly Service ND Daily Service NW Weekly Service NM Monthly Service NN Non-firm imports for native load and network customers from non-designated network resources F Firm Service		

**T L R A C T I O N S**

LEVEL	TIME	Priority	TLR 3,5 No. TX Curtail	TLR 3,5 MW Curtail	MW Flow			COMMENTS ABOUT ACTIONS
					Limiting Element Present	Post Cont.	Cont. Elem't Present	

## Appendix D

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### Examples for Parallel Flow Calculation Procedure for Reallocating or Curtailing Firm Transmission Service

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The NERC “**Parallel Flow Calculation Procedure Reference Document**” provides additional information about the criteria used to include generators in the IDC calculation process.

#### *Example of Results of Calculation Method*

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An example of the output of the IDC calculation of curtailment of firm transmission service is provided below for the specific Constrained Facility identified in the NERC Book of Flowgates as Flowgate 1368. In this example, a total Firm PTP contribution to the Constrained Facility, as calculated by the IDC, is assumed to be 21.8 MW.

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The table below presents a summary of each Balancing Authority’s responsibility to provide relief to the Constrained Facility due to its NI transmission service and service to NL contribution to the Constrained Facility. In this example, Balancing Authority LAGN would be requested to curtail 17.3 MW of its total of 401.1 MW of flow contribution on the Constrained Facility. See the “**Parallel Flow Calculation Procedure Reference Document**” for additional details regarding the information illustrated in the table (e. g. Scaled P Max and Flowgate NNL MW).

1150

In summary, Interchange Transactions would be curtailed by a total of 21.8 MW and NI transmission service and service to NL would be curtailed by a total of 178.2 MW by the five Balancing Authorities identified in the table. These curtailments would provide a total of 200.0 MW of relief to the Constrained Facility.

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<i>Sink Reliability Coordinator</i>	<i>Service Point</i>	<i>Scaled P Max</i>	<i>Flowgate NNL MW</i>	<i>Current NNL Relief</i>	<i>NNL Responsibility</i>		<i>NNL Responsibility Acknowledgement</i>	
					<i>Inc/Dec</i>	<i>Current Hr</i>	<i>Acknowledge Time</i>	<i>Total MW Resp.</i>
EES	EES	8429.7	2991.4	0.0	128.9	128.9	13:44	128.9
EES	LAGN	1514.0	718.6	0.0	31.0	31.0	13:44	31.0
SOCO	SOCO	5089.2	401.1	0.0	17.3	17.3	13:44	17.3
SWPP	CLEC	235.7	18.0	0.0	0.8	0.8	13:42	0.8
SWPP	LEPA	22.8	4.1	0.0	0.2	0.2	13:42	0.2
<b>Total</b>		<b>15291.4</b>	<b>4133.2</b>	<b>0.0</b>	<b>178.2</b>	<b>178.2</b>		<b>178.2</b>

## Appendix E

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### **How the IDC Handles Reallocation**

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The IDC algorithms reflect the reallocation and reloading principles in this Appendix, as well as the reporting requirements, and status display. The IDC will obtain the Tag Submittal Time from the Tag Authority, and post the Reloading/ Reallocation information to the NERC TLR site.

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A summary of IDC features that support the reallocation process is provided in Attachment E1. Details on the interface and display features are provided in Attachment E2. Refer to Version 1.7.095 NERC Transaction Information Systems Working Group (TISWG) *Electronic Tagging Functional Specification* for details about the E-Tag system.

#### **E1 – Summary of IDC Features that Support Transaction Reloading/Reallocation**

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The following is a summary of IDC features and E-Tag interface that support Reloading/Reallocation:

##### ***Information posted from IDC to NERC TLR site.***

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1. Restricted directions (all source/sink combinations that impact a Constrained Facility(ies) with TLR 2 or higher) will be posted to the NERC TLR site and updated as necessary.
2. TLR Constrained Facility status and Transfer Distribution Factors will continue to be posted to NERC TLR site.
3. Lowest priority of Interchange Transactions (marginal “bucket”) to be Reloaded/Reallocated next-hour on each TLR Constrained Facility will be posted on NERC TLR site. This will provide an indication to the market of priority of Interchange Transactions that may be Reloaded/Reallocated the following hours.

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##### ***IDC Logic, IDC Report, and Timing***

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1. The Reliability Coordinator will run the IDC the Reloading/Reallocation report at approximately 00:26 The IDC will prompt the Reliability Coordinator to enter a maximum loading value. The IDC will alarm if the Reliability Coordinator doesn't enter this value and issue a report by 00:30 or change from TLR 3a Level. The Report will be distributed to Balancing Authorities and Transmission Operators at 00:30. This process repeats every hour as long as the approved Tag submission deadline for Reallocation is in effect (or until the TLR level is reduced to 1 or 0).

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2. For Interchange Transactions in the restricted directions, tags must be submitted to the IDC by the approved Tag submission deadline for Reallocation to be considered

for Reallocation next-hour. The time stamp by the Tag Authority is regarded the official tag submission time.

- 1200 3. Tags submitted to IDC after the approved Tag submission deadline for Reallocation will not be allowed to start or increase but will be considered for Reallocation the next hour.
4. Interchange Transactions in restricted directions that are not indicated as “PROCEED” on the Reload/Reallocation Report will not be permitted to start or increase next hour.

1205 ***Reloading/Reallocation Transaction Status***

Reloading/Reallocation status will be determined by the IDC for all Interchange Transactions. The Reloading/Reallocation status of each Interchange Transaction will be listed on IDC reports and NERC TLR site as appropriate. An Interchange Transaction is considered to be in a restricted direction if it is at or above the Curtailment Threshold.

1210 Interchange Transactions below the Curtailment Threshold are unrestricted and free to flow subject to all applicable Policy and tariff rules.

- 1215 1. **HOLD.** Permission has not been given for Interchange Transaction to start or increase and is waiting for the next Reloading/Reallocation evaluation for which it is a candidate. Interchange Transactions with E-tags submitted to the Tag Authority prior to TLR 2 or higher being declared (pre-tagged) will change to CURTAILED Status upon evaluation that does not permit them to start or increase. Transactions with E-tags submitted to Tag Authority after TLR 2 or higher was declared (post-tagged) will retain HOLD Status until given permission to proceed or E-Tag expires.
- 1220 2. **CURTAILED.** Transactions for which E-Tags were submitted to Tag Authority prior to TLR 2 or higher being declared (pre-tagged) and ordered to be curtailed totally, curtailed partially, not permitted to start, or not permitted to increase. Interchange Transactions (pre-tagged or post-tagged) that were flowing and ordered to be reduced or totally curtailed. The Balancing Authority will indicate to the IDC through the E-Tag adjustment table the Interchange Transaction’s curtailed values.
- 1225 3. **PROCEED:** Interchange Transaction is flowing or has been permitted to flow as a result of Reloading/Reallocation evaluation. The Balancing Authority will indicate through the E-Tag adjustment table to IDC if Interchange Transaction will reload, start, or increase next-hour per PSE’s energy schedule as appropriate.

***Reallocation/Reloading Priorities***

- 1230 1. Interchange Transaction candidates are ranked for loading and curtailment by priority as per Appendix 9C1, Section E, “Principles for Mitigating Constraints On and Off the Contract Path”]. This is called the “Constrained Path Method,” or CPM. (secondary, hourly, daily, ... firm etc). Interchange Transactions are curtailed and loaded pro-rata within priority level per TLR algorithm.
- 1235 2. Reloading/Reallocation of Interchange Transactions are prioritized first by priority per CPM. E-Tags must be submitted to the IDC by the approved-Tag submission

deadline for Reallocation of the hour during which the Interchange Transaction is scheduled to start or increase to be considered for Reallocation.

- 1240 3. During Reloading/Reallocation, Interchange Transactions using lower priority Transmission Service will be curtailed pro-rata to allow higher priority transactions to reload, increase, or start. Equal priority Interchange Transactions will not reload, start, or increase by pro-rata curtailment of other equal priority Interchange Transactions.
- 1245 4. Reloading of Interchange Transactions using Non-firm Transmission Service with CURTAILED Status will take precedence over starting or increasing of Interchange Transactions using Non-firm Transmission Service of the same priority with PENDING Status.
- 1250 5. Interchange Transactions using Firm Point-to-Point Transmission Service will be allowed to start as scheduled under TLR 3a as long as their E-Tag was received by the IDC by the approved-Tag submission deadline for Reallocation of the hour during which the Interchange Transaction is due to start or increase, regardless of whether the E-tag was submitted to the Tag Authority prior to TLR 2 or higher being declared or not. If this is the initial issuance of the TLR 3a, Interchange Transactions using Firm Point-to-Point Transmission Service will be allowed to start as scheduled as long as their E-Tag was received by the IDC by the time the TLR is declared.
- 1255

***Total Flow Value on a Constrained Facility for Next Hour***

1. The Reliability Coordinator will calculate the change in net flow on a Constrained Facility due to Reallocation for the next hour based on:
  - 1260 • Present constrained facility loading, present level of Interchange Transactions, and Balancing Authorities NNL responsibility<sup>3</sup> (TLR Level 5a) impacting the Constrained Facility,
  - SOLs or IROLs, known interchange impacts and Balancing Authority NNL responsibility (TLR Level 5a) on the Constrained Facility the next hour, and
  - Interchange Transactions scheduled to begin the next hour.
- 1265 2. The Reliability Coordinator will enter a maximum loading value for the constrained facility into the IDC as part of issuing the Reloading/Reallocation report.
3. The Reliability Coordinator is allowed to call for TLR 3a or 5a when approaching a SOL or IROL to allow maximum transactional flow next hour, and to manage flows without violating transmission limits.

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<sup>3</sup> Flows due to service to Network Customers and Native Load. See “**Parallel Flow Calculation Procedure Reference Document.**”

- 1270 4. The simultaneous curtailment and Reallocation for a Constrained Facility is allowed. This reduces the flow over the Constrained Facility while allowing Interchange Transactions using higher priority Transmission Service to start or increase the next hour. This may be used to accommodate change in flow next-hour due to changes other than point-to-point Interchange Transactions while respecting the priorities of
- 1275 Interchange Transactions flowing and scheduled to flow the next hour. The intent is to reduce the need for using TLR 3b, which prevents new Interchange Transactions from starting or increasing the next hour.
- 1280 5. The Reliability Coordinator must allow Interchange Transactions to be reloaded as soon as possible. Reloading must be in an orderly fashion to prevent a SOL or IROL violation from (re)occurring and requiring holding or curtailments in the restricted direction.

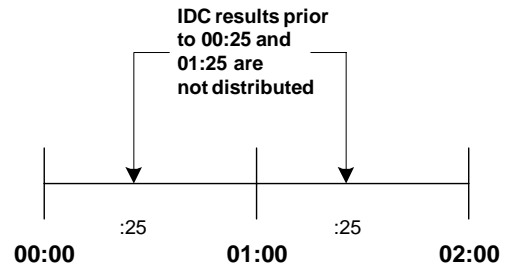


**E2 – Timing Requirements**

***TLR Levels 3a and 5a Issuing/Processing Time Requirement***

1285 1. In order for the IDC to be reasonably certain that a TLR Level 3a or 5a re-allocation/reloading report in which all tags submitted by the approved-Tag submission deadline for Reallocation are included, the report must be generated no earlier than 00:25 to allow the 10-minute approval time for Transactions that start next hour.

1290 2. In order to allow a Reliability Coordinator to declare a TLR Level 3a or 5a any time during the hour, the TLR declaration and Reallocation/Reloading report distribution will be treated as independent processes by IDC. That is, a Reliability Coordinator may declare a TLR Level 3a or 5a at any time during the course of an hour. However, if a TLR Level 3a or 5a is declared for the next hour prior to 00:25 (see Figure 5 at right), the Reallocation/Reloading report that is generated will be made available to the issuing Reliability Coordinator only for previewing purposes, and can not be distributed to the other Reliability Coordinators or the market. Instead, the issuing Reliability Coordinator will be reminded by an IDC alarm at 00:25 to generate a new Reallocation/Reloading report that will include all tags submitted prior to the approved-Tag submission deadline for Reallocation.



**Figure 5 - IDC report may be run prior to 00:25, but results are not distributed.**

1300 3. A TLR Level 3a or 5a Reallocation/Reloading report must be confirmed by the issuing Reliability Coordinator prior to 00:30 in order to provide a minimum of 30 minutes for the Reliability Coordinators with tags sinking in its Reliability Area to coordinate the Reallocation and Reloading with the Sink Balancing Authorities. This provides only 5 minutes (from 00:25 to 00:30) for the issuing Reliability Coordinator to generate a Reallocation/Reloading report, review it, and approve it.

1310 4. The TLR declaration time will be recorded in the IDC for evaluating transaction sub-priorities for Reallocation/Reloading purposes (see Sub-priority Table, in the **IDC Calculations and Reporting** section below).

1315 ***Re-Issuing of a TLR Level 2 or Higher***

Each hour, the IDC will automatically remind the issuing Reliability Coordinator (via an IDC alarm) of a TLR level 2 or higher declared in the previous hour or earlier about re-issuing the TLR. The purpose of the reminder is to enable the Reliability Coordinator to Reallocate or reload currently halted or curtailed Interchange Transactions next hour. The reminder will be in the form of an alarm to the issuing Reliability Coordinator, and will take place at 00:25 so that, if the Reliability Coordinator re-issues the TLR as a TLR level 3a or 5a, all tags submitted prior to the approved-Tag submission deadline for Reallocation are available in the IDC.

***IDC Assistance with Next Hour PTP Transactions***

1325 In order to assist a Reliability Coordinator in determining the MW relief required on a  
 Constrained Facility for the next hour for a TLR level 3a or 5a, the IDC will calculate and  
 present the total MW impact of all currently flowing and scheduled Point-to-Point  
 Transactions for the next hour. In order to assist a Reliability Coordinator in determining  
 the MW relief required on a Constrained Facility for the next hour during a TLR level 5a,  
 1330 the IDC will calculate and present the total MW impact of all currently flowing and  
 scheduled Point-to-Point Transactions for the next hour as well as Balancing Authority  
 with flows due to service to Network Customers and Native Load. The Reliability  
 Coordinator will then be requested to provide the total incremental or decremental MW  
 amount of flow through the Constrained Facility that can be allowed for the next hour.  
 1335 The value entered by the Reliability Coordinator and the IDC-calculated amounts will be  
 used by the IDC to identify the relief/reloading amounts (delta incremental flow value)  
 on the constrained facility. The IDC will determine the Transactions to be reloaded,  
 reallocated, or curtailed to make room for the Transactions using higher priority  
 Transmission Service. The following examples show the calculation performed by IDC to  
 1340 identify the “delta incremental flow”:

Example 1

Flow to maintain on Facility	800 MW
Expected flow next hour from Transactions using Point-to-Point Transmission Service	950 MW
Contribution from flow next hour from service to Network customers and Native Load	-100 MW
Expected Net flow next hour on Facility	850 MW
Amount of Transactions using Point-to-Point Transmission Service to hold for Reallocation	850 MW – 800 MW = 50 MW
Amount to enter into IDC for Transactions using Point-to-Point Transmission Service	950 MW – 50 MW = 900 MW

Example 2

Flow to maintain on Facility	800 MW
Expected flow next hour from Transactions using Point-to-Point Transmission Service	950 MW
Contribution from flow next hour from service to Network customers and Native Load	50 MW
Expected Net flow next hour on Facility	1000 MW
Amount of Transactions using Point-to-Point Transmission Service to hold for Reallocation	1000 MW – 800 MW = 200 MW
Amount to enter into IDC for Transactions using	950 MW – 200 MW = 750 MW

Point-to-Point Transmission Service	
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Example 3

Flow to maintain on Facility	800 MW
Expected flow next hour from Transactions using Point-to-Point Transmission Service	950 MW
Contribution from flow next hour from service to Network customers and Native Load	-200 MW
Expected Net flow next hour on Facility	750 MW
Amount of Transactions using Point-to-Point Transmission Service to hold for Reallocation	750 MW – 800 MW = -50 MW None are held

- 1345 For a TLR levels 3b or 5b the IDC will request the Reliability Coordinator to provide the MW requested relief amount on the Constrained Facility, and will not present the current and next hour MW impact of PTP transactions. The Reliability Coordinator-entered requested relief amount will be used by IDC to determine the Interchange Transaction Curtailments and flows due to service to Network Customers and Native Load (TLR
- 1350 Level 5b) in order to reduce the SOL or IROLSOL or IROL violation on the Constrained Facility by the requested amount.

***IDC Calculations and Reporting***

1355 At the time the TLR report is processed, the IDC will use all candidate Interchange Transactions for Reallocation that met the approved-Tag submission deadline for Reallocation plus those Interchange Transactions that were curtailed or halted on the previous TLR action of the same TLR event. The IDC will calculate and present an Interchange Transactions Halt/Curtailment list that will include reload and Reallocation of Interchange Transactions. The Interchange Transactions are prioritized as follows:

- 1360 1. All Interchange Transactions will be arranged by Transmission Service priority according to the Constrained Path Method. These priorities range from 1 to 6 for the various non-firm Transmission Service products (TLR levels 3a and 3b). Interchange Transactions using Firm Transmission Service (priority 7) are used only in TLR levels 5a and 5b. Next-Hour Market Service is included at priority 0 (zero)
- 1365 2. In a TLR Level 3a the Interchange Transactions using Non-firm Transmission Service in a given priority will be further divided into four sub-priorities, based on current schedule, current active schedule (identified by the submittal of a tag ADJUST message), next-hour schedule, and tag status. Solely for the purpose of identifying which Interchange Transactions to be loaded under a TLR 3a, various
- 1370 MW levels of an Interchange Transaction may be in different sub-priorities. The sub-priorities are shown in the table on the following page:

<i>Priority</i>	<i>Purpose</i>	<i>Explanation and Conditions</i>
S1	To allow a flowing Interchange Transaction to maintain or reduce its current MW amount in accordance with its energy profile.	The MW amount is the lowest between currently flowing MW amount and the next-hour schedule. The currently flowing MW amount is determined by the e-tag ENERGY PROFILE and ADJUST tables. If the calculated amount is negative, zero is used instead.
S2	To allow a flowing Interchange Transaction that has been curtailed or halted by TLR to reload to the <i>lesser</i> of its current-hour MW amount or next-hour schedule in accordance with its energy profile.	The Interchange Transaction MW amount used is determined through the e-tag ENERGY PROFILE and ADJUST tables. If the calculated amount is negative, zero is used instead.
S3	To allow a flowing Transaction to increase from its current-hour schedule to its next-hour schedule in accordance with its energy profile.	The MW amounts used in this sub-priority is determined by the e-tag ENERGY PROFILE table. If the calculated amount is negative, zero is used instead.
S4	To allow a Transaction that had never started and was submitted to the Tag Authority after the TLR (level 2 or higher) has been declared to begin flowing (i.e., the Interchange Transaction never had an active MW and was submitted to the IDC <i>after</i> the first TLR Action of the TLR Event had been declared.)	The Transaction would not be allowed to start until all other Interchange Transactions submitted prior to the TLR with the same priority have been (re)loaded. The MW amount used is the sub-priority is the next-hour schedule determined by the e-tag ENERGY PROFILE table.

Examples of Interchange Transactions using Non-firm Transmission Service sub-priority settings begin in the **Transaction Sub-priority Examples** section below.

3. All Interchange Transactions using Firm Transmission Service will be put in the same priority group, and will be Curtailed/Reallocated pro-rata, independent of their current status (curtailed or halted) or time of submittal with respect to TLR issuance (TLR level 5a). Under a TLR 5a, all Interchange Transactions using Non-firm Transmission Service that is at or above the Curtailment Threshold will have been curtailed and hence sub-prioritizing is not required.

All Interchange Transactions processed in a TLR are assigned one of the following statuses:

- 1385 PROCEED: The Interchange Transaction has started or is allowed to start to the next hour MW schedule amount.
- CURTAILED: The Interchange Transaction has started and is curtailed due to the TLR, or it had not started but it was submitted prior to the TLR being declared (level 2 or higher).
- 1390 HOLD: The Interchange Transaction had never started and it was submitted after the TLR being declared – the Interchange Transaction is held from starting next hour or the transaction had never started and it was submitted to the IDC after the approved-Tag submission deadline – the Interchange Transaction is to be held from starting next hour and is not included in the Reallocation
- 1395 calculations until following hour.

1400 Upon acceptance of the TLR Transaction reallocation/reloading report by the issuing Reliability Coordinator, the IDC will generate a report to be sent to NERC that will include the PSE name and Tag ID of each Interchange Transaction in the IDC TLR report. The Interchange Transaction will be ranked according to its assigned status of HOLD, CURTAILED or PROCEED. The reloading/reallocation report will be made available at NERC’s public TLR site, and it is NERC’s responsibility to format and publish the report.

***Tag Reloading for TLR Levels 1 and 0***

1405 When a TLR Level 1 or 0 is issued, the Constrained Facility is no longer under SOL or IROL violation and all Interchange Transactions are allowed to flow. In order to provide the Reliability Coordinators with a view of the Interchange Transactions that were halted or curtailed on previous TLR actions (level 2 or higher) and are now available for reloading, the IDC provides such information in the TLR report.

***New Tag Alarming***

1410 Those Interchange Transactions that are at or above the Curtailment Threshold and are *not* candidates for reallocation because the tags for those Transactions were not submitted by the approved-Tag submission deadline for Reallocation will be flagged as HOLD and must not be permitted to start or increase during the next hour. To alert Reliability

1415 Coordinators of those Transactions required to be held, the IDC will generate a report (for viewing within the IDC only) at various times. The report will include a list of all HOLD Transactions. In order not to overwhelm the Reliability Coordinator with alarms, only those who issued the TLR and those whose Transactions sink within their Reliability Area will be alarmed. An alarm will be issued for a given tag only once and will be

1420 issued for all TLR levels for which halting new Transactions is required: TLR Level 2, 3a, 3b, 5a and 5b.

***Tag Adjustment***

1425 The Interchange Transactions with statuses of HOLD, CURTAILED or PROCEED must be adjusted by a Tag Authority or Tag Approval entity. Without the tag adjustments, the IDC will assume that Interchange Transactions were not curtailed/held and are flowing at their specified schedule amounts.

- 1430 1. Interchange Transactions marked as CURTAILED should be adjusted to a cap equal to, or at the request of the originating PSE, less than the reallocated amount (shown as the MW CAP on the IDC report). This amount may be zero if the Transaction is fully curtailed.
2. Interchange Transaction marked as PROCEED should be adjusted to reload (NULL or to its MW level in accordance with its Energy Profile in the adjusted MW in the E-Tag) if the Interchange Transaction has been previously adjusted; otherwise, if the Interchange Transaction is flowing in full, the Tag Authority need not issue an adjust.
- 1435 3. Interchange Transactions marked as HOLD should be adjusted to 0 MW.

***Special Tag Status***

1440 There are cases in which a tag may be marked with a composite state of ATTN\_REQD to indicate that tag Authority/Approval failed to communicate or there is an inconsistency between the validation software of different Tag Authority/Approval Entities. In this situation, the tag is no longer subject to passive approval and its status change to IMPLEMENT may take longer than 10 minutes. Under these circumstances, the IDC may have a tag that is issued prior to the Tag Submittal Deadline that will not be a candidate for reallocation. Such tags, when approved by the Tag Authority, will be marked as HOLD and must be halted.

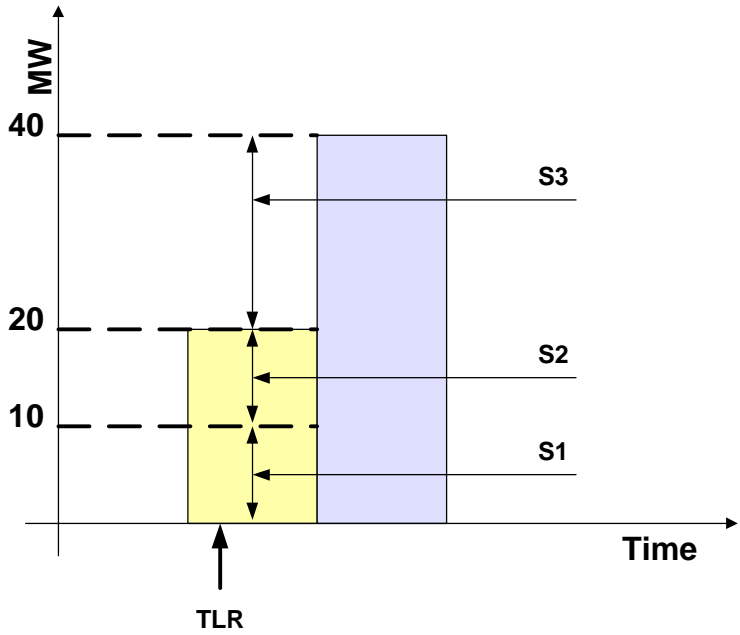
1445 ***Transaction Sub-Priority Examples***

The following describes examples of Interchange Transactions using Non-firm Transmission Service sub-priority setting for an Interchange Transaction under different circumstances of current-hour and next-hour schedules and active MW flowing as modified by tag adjust table in E-Tag.

1450

Example 1 – Transaction curtailed, next-hour Energy Profile is higher

Energy Profile: Current hour	20 MW
Actual flow following curtailment: Current hour	10 MW
Energy Profile: Next hour	40 MW

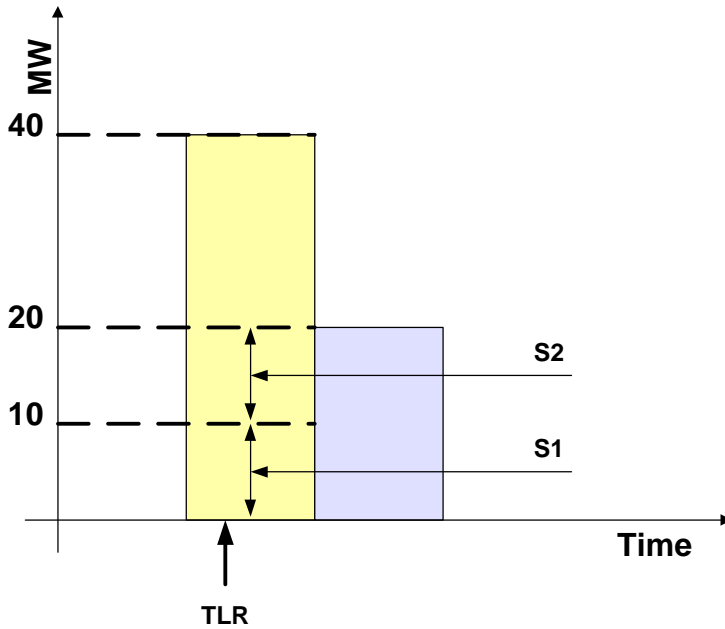


*Sub-priorities for Transaction MW:*

<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	10 MW	Maintain current curtailed flow
S2	+10 MW	Reload to current hour Energy Profile
S3	+20 MW	Load to next hour Energy Profile
S4		

Example 2 – Transaction curtailed, next-hour Energy Profile is lower

Energy Profile: Current hour	40 MW
Actual flow following curtailment: Current hour	10 MW
Energy Profile: Next hour	20 MW



1455

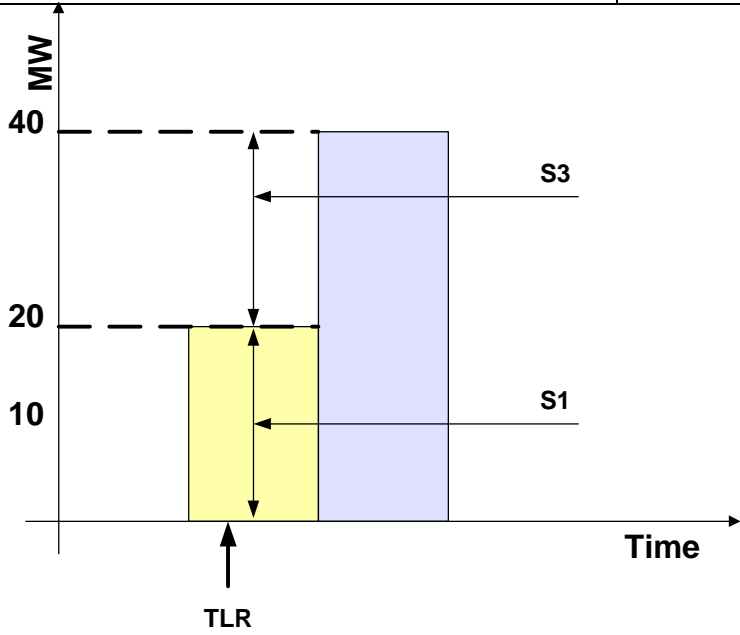
**Sub-priorities for Transaction MW:**

<b>Sub-Priority</b>	<b>MW Value</b>	<b>Explanation</b>
S1	10 MW	Maintain current curtailed flow
S2	+10 MW	Reload to <i>lesser</i> of current and next-hour Energy Profile
S3	+0 MW	Next-hour Energy Profile is 20MW, so no change in MW value
S4		



Example 3 – Transaction not curtailed, next-hour Energy Profile is higher

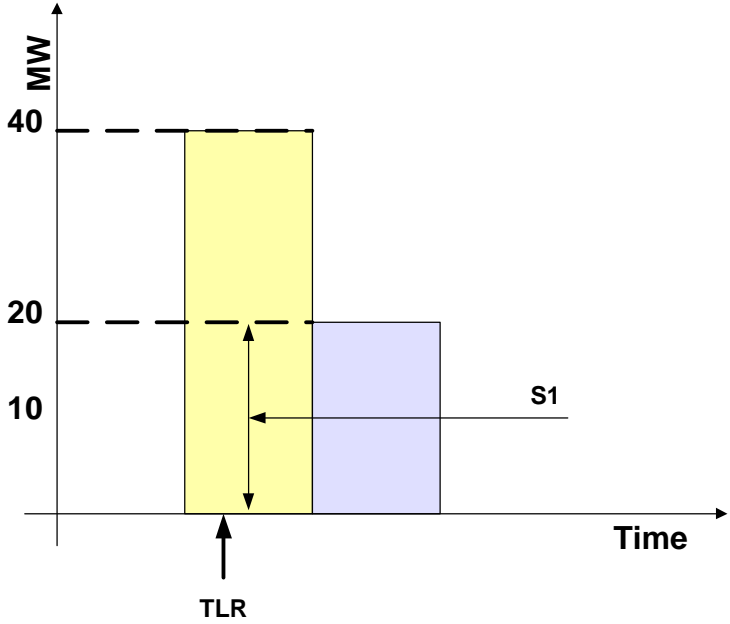
Energy Profile: Current hour	20 MW
Actual flow following curtailment: Current hour	20 MW (no curtailment)
Energy Profile: Next hour	40 MW



<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	20 MW	Maintain current flow (not curtailed)
S2	+0 MW	Reload to <i>lesser</i> of current and next-hour Energy Profile
S3	+20 MW	Next-hour Energy Profile is 40MW
S4		

1460 Example 4 – Transaction not curtailed, next-hour Energy Profile is lower

Energy Profile: Current hour	40 MW
Actual flow following curtailment: Current hour	40 MW (no curtailment)
Energy Profile: Next hour	20 MW

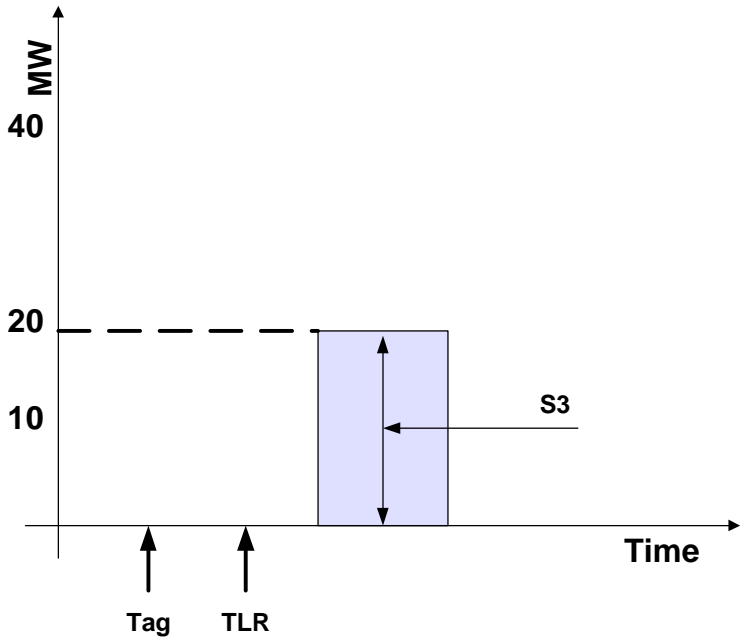


*Sub-priorities for Transaction MW:*

<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	20 MW	Reduce flow to next-hour Energy Profile (20MW)
S2	+0 MW	Reload to <i>lesser</i> of current and next-hour Energy Profile
S3	+0 MW	Next-hour Energy Profile is 20MW
S4		

Example 5 – TLR Issued before Transaction was scheduled to start

Energy Profile: Current hour	0 MW	1465
Actual flow following curtailment: Current hour	0 MW (Transaction scheduled to start <i>after</i> TLR initiated)	
Energy Profile: Next hour	20 MW	



<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	0 MW	Transaction was not allowed to start
S2	+0 MW	Transaction was not allowed to start
S3	+20 MW	Next-hour Energy Profile is 20MW
S4	+0	Tag submitted prior to TLR

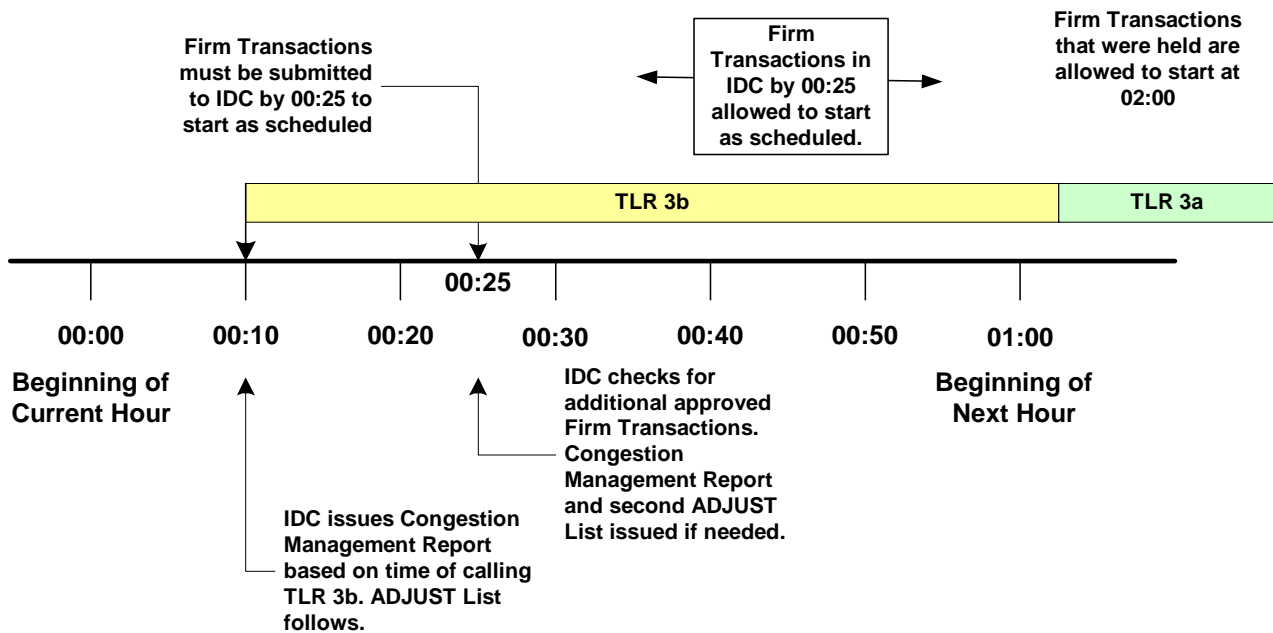
1470 **Appendix F**

**Considerations for Interchange Transactions Using Firm Point-to-Point Transmission Service**

1475

The following cases explain the circumstances under which an Interchange Transaction using Firm Point-to-Point Transmission Service will be allowed to start as scheduled during a TLR 3b:

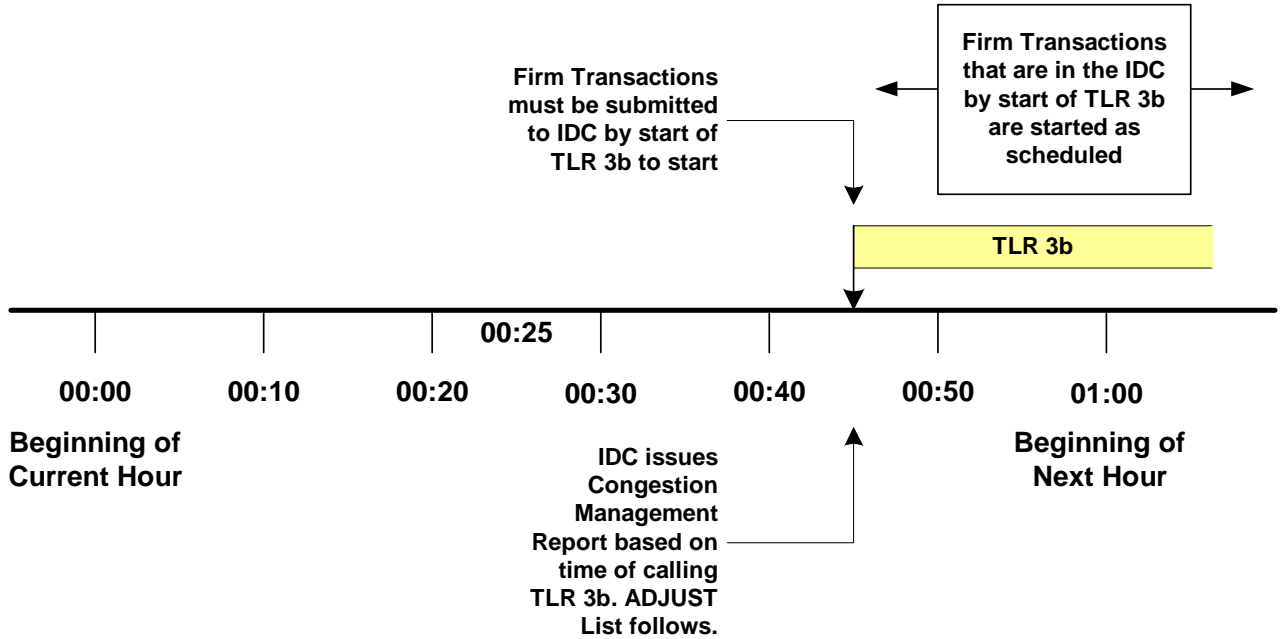
1480 Case 1: TLR 3b is called between 00:00 and 00:25 and the Interchange Transaction using Firm Point-to-Point Transmission Service is submitted to IDC by 00:25.



1. The IDC will examine the current hour (00) and next hour (01) for all Interchange Transactions.
- 1485 2. The IDC will issue an ADJUST List based upon the time the TLR 3b is called. The ADJUST List will include curtailments of Interchange Transactions using Non-firm Point-to-Point Transmission Service as necessary to allow room for those Interchange Transactions using Firm Point-to-Point Transmission Service to start as scheduled.
- 1490 3. At 00:25, the IDC will check for additional Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by that time and issue a second ADJUST List if those additional Interchange Transactions are found.
4. All existing or new Interchange Transactions using Non-firm Point-to-Point Transmission Service that are increasing or expected to start during the current

- 1495 hour or next hour will be placed on HALT or HOLD. There is no Reallocation of lower-priority Interchange Transactions using Non-firm Point-to-Point Transmission Service.
5. Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by 00:25 will be allowed to start as scheduled.
- 1500 6. Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC after 00:25 will be held.
7. Once the SOL or IROLSOL or IROL violation is mitigated, the Reliability Coordinator shall call a TLR Level 3a (or lower). If a TLR Level 3a is called:
- 1505 a. Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by 00:25 will be allowed to start as scheduled at 02:00.
- b. Interchange Transactions using Non-firm Point-to-Point Transmission Service that were held may then be reallocated to start at 02:00.

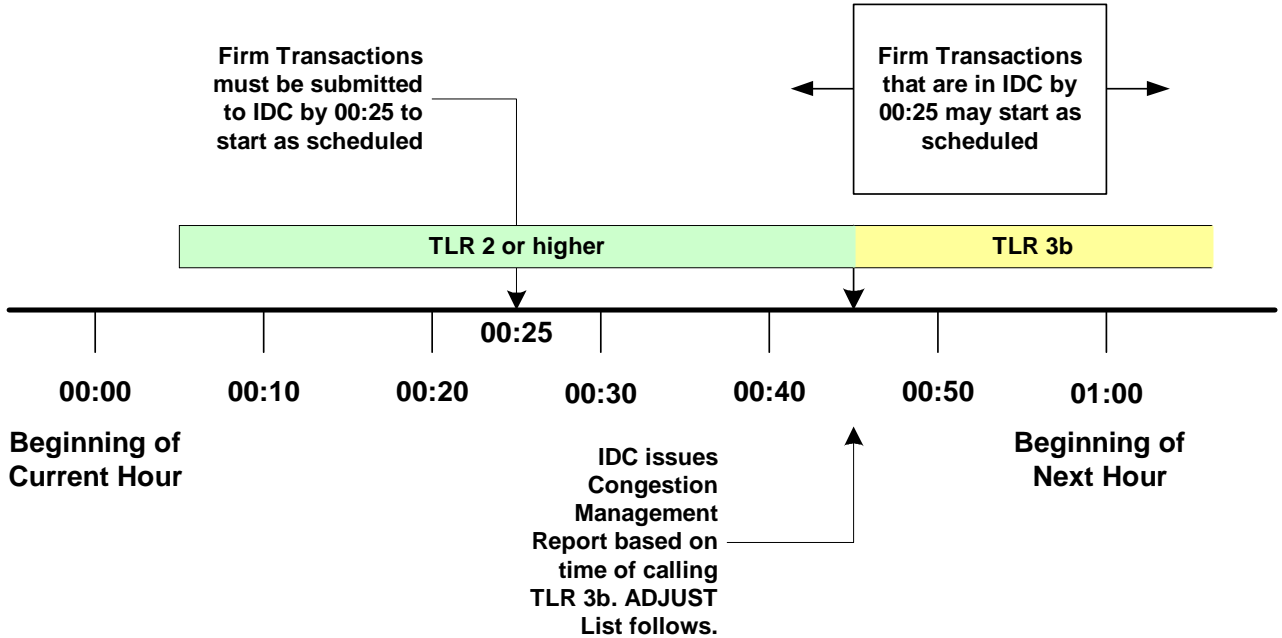
1510 Case 2: TLR 3b is called after 00:25 and the Interchange Transaction using Firm Point-to-Point Transmission Service is submitted to the IDC no later than the time at which the TLR 3b is called.



- 1515 1. The IDC will examine the current hour (00) and next hour (01) for all Interchange Transactions.
- 2. The IDC will issue an ADJUST List at the time the TLR 3b is called. The ADJUST List will include additional curtailments of Interchange Transactions using Non-firm Point-to-Point Transmission Service as necessary to allow room for those Interchange Transactions using Firm Point-to-Point Transmission Service to start at as scheduled.
- 1520 3. All existing or new Interchange Transactions using Non-firm Point-to-Point Transmission Service that are increasing or expected to start during the current hour or next hour will be placed on HALT or HOLD. There is no Reallocation of lower-priority Interchange Transactions using Non-firm Point-to-Point Transmission Service.
- 1525 4. Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by the time the TLR 3b was called will be allowed to start at as scheduled.
- 1530 5. Interchange Transaction using Firm Point-to-Point Transmission Service that were submitted to the IDC after the TLR 3b was called will be held until the next issuance for TLR (either TLR 3b, 3a, or lower level.)

Case 3. TLR 2 or higher is in effect, a TLR 3b is called after 00:25, and the Interchange Transaction using Firm Point-to-Point Transmission Service is submitted to the IDC by 00:25.

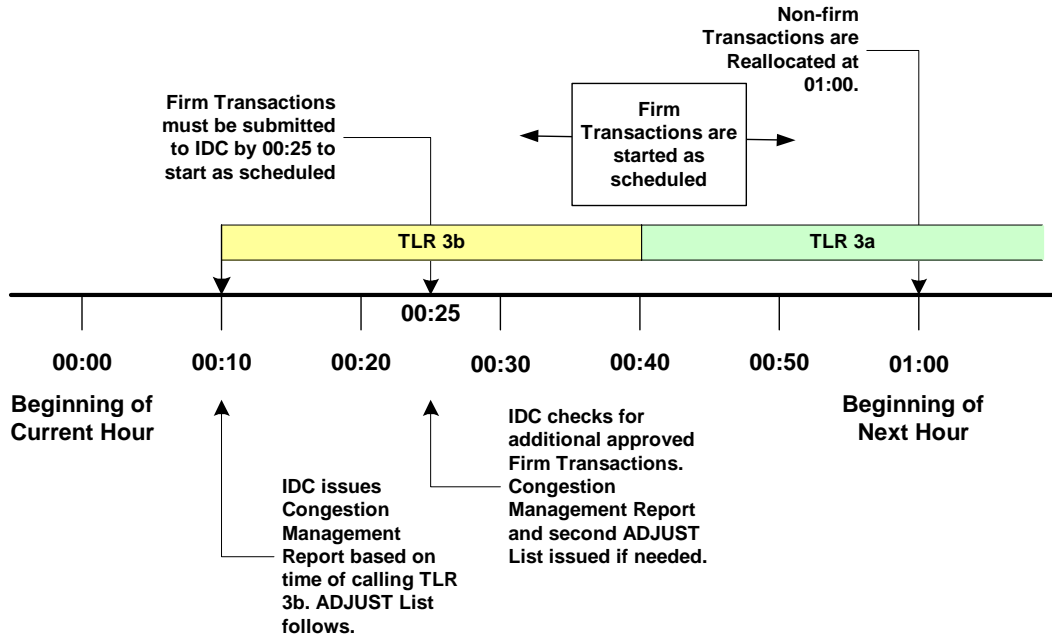
1535



If TLR 2 or higher has been issued and 3B is subsequently issued, then only those Interchange Transactions using Firm Point-to-Point Transmission Service that had been submitted to the IDC by 00:25 will be allowed to start as scheduled. All other Interchange Transactions are held.

1540

Case 4. TLR 3b is called before 00:25 and the Interchange Transaction is submitted to the IDC by 00:25. TLR 3a is called at 00:40.

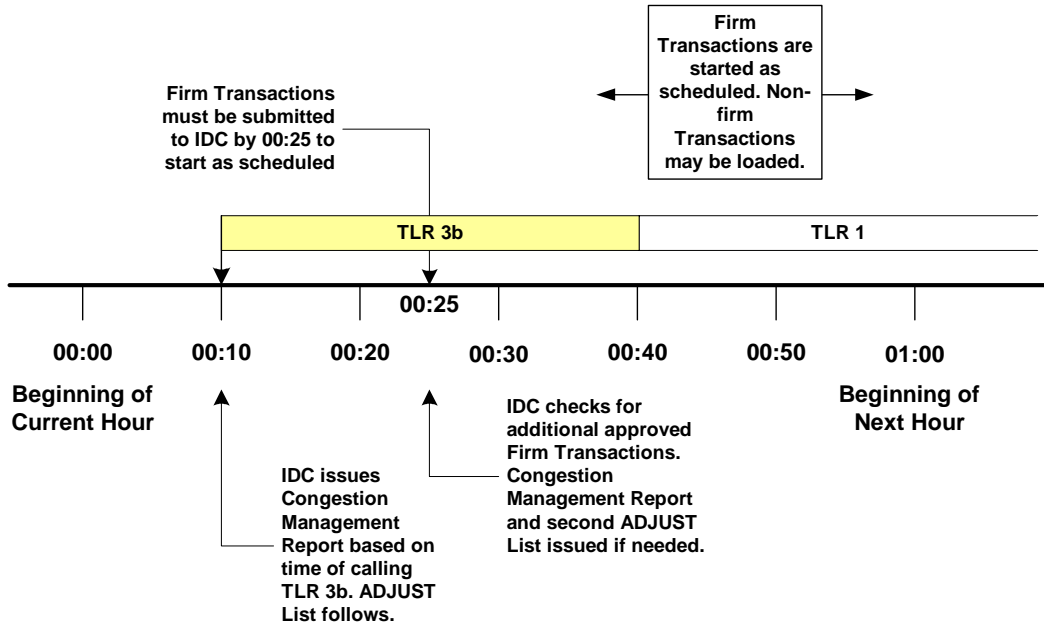


1545

1. Same as Case 1, but TLR Level 3b ends at 00:40 and becomes TLR Level 3a.
2. All Interchange Transactions using Firm Point-to-Point Transmission Service will start as scheduled if in by the time the 3A is declared.
3. All Interchange Transactions using Non-firm Point-to-Point Transmission Service are reallocated at 01:00.



1550 Case 5. TLR 3b is called before 00:25 and the Interchange Transaction is submitted to the IDC by 00:25. TLR 1 is called at 00:40.



1. Same as Case 1, but TLR Level 3b ends at 00:40 and becomes TLR Level 1.
2. All Interchange Transactions using Firm Point-to-Point Transmission Service will start as scheduled.
3. All Interchange Transactions using Non-firm Point-to-Point Transmission Service may be loaded immediately.

1555

1560 **Appendix G**

**Examples of On-Path and Off-Path Mitigation**

*Examples*

1565 This section explains, by example, the obligations of the Transmission Service Providers on and off the contract path when calling for Transmission Loading Relief. (References to Principles refer to **Requirement 4, “Mitigating Constraints On and Off the Contract Path during TLR,”** on the preceding pages.) When Reallocating or curtailing Interchange Transactions using Firm Point-to-Point Transmission Service under TLR

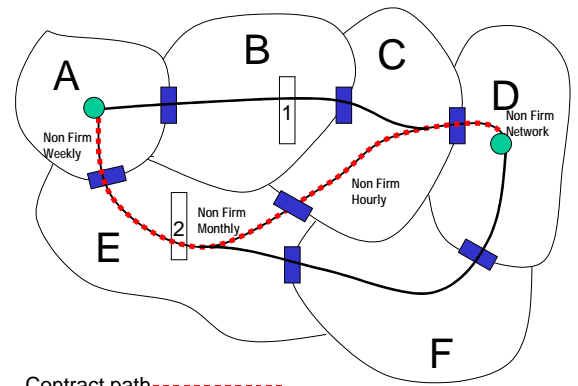
1570 Level 5a or 5b, the Transmission Service Providers may be obligated to perform comparable curtailments of its Transmission Service to Network Integration and Native Load customers. See **Requirement 5, “Parallel Flow Calculation Procedure for Reallocating or Curtailing Firm Transmission Service during TLR”**.

Scenario:

- 1575
- Interchange Transaction arranged from system A to system D, and assumed to be at or above the Curtailment Threshold
  - Contract path is A-E-C-D (except as noted)
  - Locations 1 and 2 denote Constraints

Case 1: E is a non-firm Monthly path, C is non-firm Hourly; E has Constraint at #2.

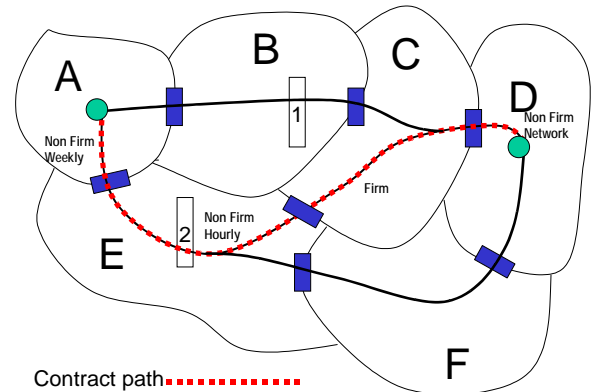
- 1580
- E may call Reliability Coordinator for TLR Procedure to relieve overload at Constraint #2.
  - Interchange Transaction A-D may be curtailed by TLR action **as though it was being served by Non-firm Monthly Point-to-Point Transmission Service**, even though it was using Non-firm Hourly Point-to-Point Transmission Service from C. That is, it takes on the priority of the link with the Constrained Facility along the contract path. (Principle 1)
- 1585



Contract path.....

Case 2: E is a non-firm hourly path, C is firm; E has Constraint at #2.

- 1590
- Although C is providing Firm Service, the Constraint is not on C’s system; therefore E is not obligated to treat the Interchange Transaction as though it was being served by Firm Point-to-Point Transmission Service.
- 1595



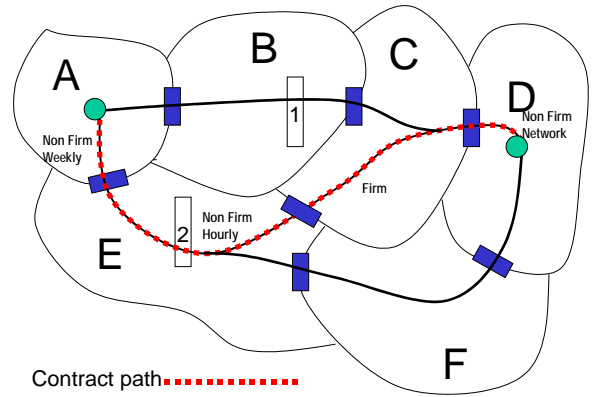
Contract path.....

- E may call Reliability Coordinator for TLR Procedure to relieve overload at Constraint #2.

- 1600
- Interchange Transaction A-D may be curtailed by TLR action as though it was being served by Non-firm Hourly Point-to-Point Transmission Service, even though it was using firm service from C. That is, when the constraint is on the contract path, the Interchange Transaction takes on the priority of the link with the Constrained Facility. (Principle 1)

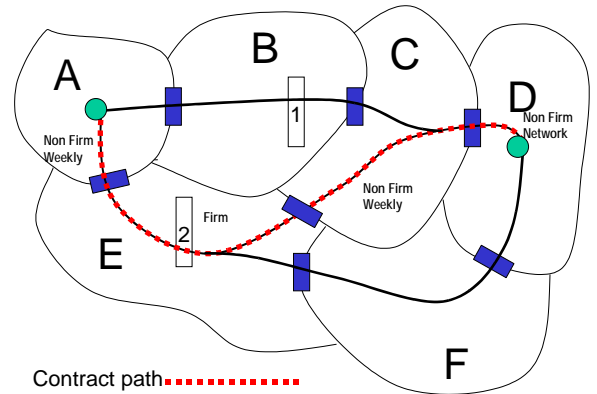
1605 Case 3: E is a non-firm hourly path, C is firm, B has Constraint at #1.

- B may call Reliability Coordinator for TLR Procedure to relieve overload at Constraint #1.
- Interchange Transaction A-D may be curtailed by TLR action as though it was being served by Non-firm Hourly Transmission Service, even if it was using firm Transmission Service elsewhere on the path. When the constraint is off the contract path, the Interchange Transaction takes on the lowest priority reserved on the contract path. (Principle 3)



1615 Case 4: E is a firm path; A, D, and C are Non-firm; E has Constraint at #2.

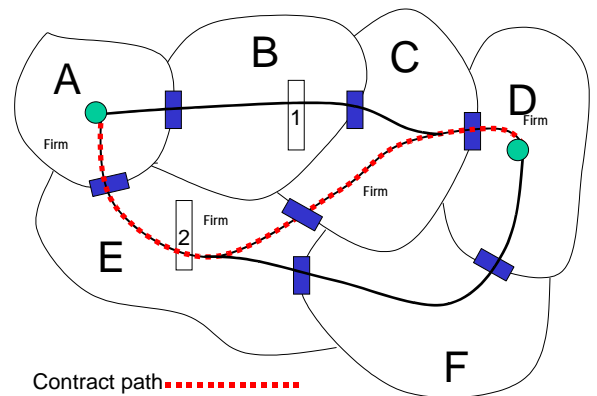
- Interchange Transaction A – D is considered Firm priority for curtailment purposes.
- E may then call Reliability Coordinator for TLR, which would curtail all Interchange Transactions using Non-firm Point-to-Point Transmission Service first.



- E is obligated to try to reconfigure transmission to mitigate Constraint #2 in E before E may curtail the Interchange Transaction as ordered by the TLR. (Principle 2)

1625 Case 5: The entire path (A-E-C-D) is firm; E has Constraint at #2.

- Interchange Transaction A – D is considered Firm priority for curtailment purposes.
- E may call Reliability Coordinator for TLR, which would curtail all Interchange Transactions using Non-firm Point-to-Point Transmission Service first.
- E is obligated to curtail Interchange Transactions

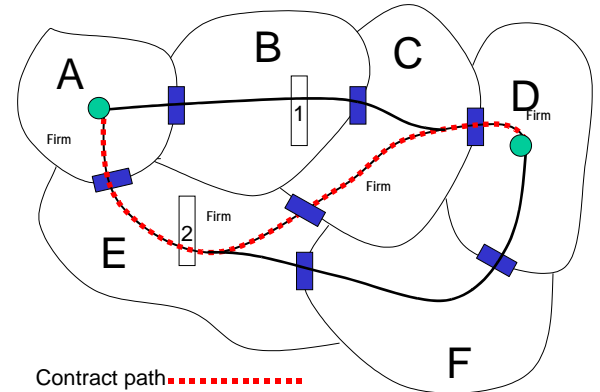


1635 using Non-firm Point-to-Point Transmission Service, and then reconfigure transmission on its system, or, if there is an agreement in place, arrange for reconfiguration or other congestion management options on another system, to mitigate Constraint #2 in E before the firm A-D transaction is curtailed. (Principle 2)

- A, C, D, may be requested by E to try to reconfigure transmission to mitigate Constraint #2 in E at E’s expense. (Principle 2)

1640 Case 6: The entire path (A-E-C-D) is firm; B has Constraint at #1.

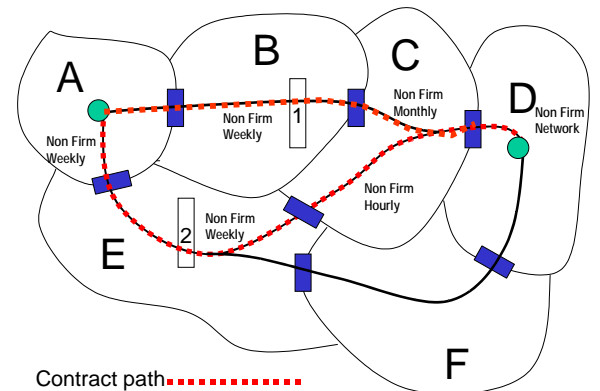
- Interchange Transaction A – D is considered Firm priority for curtailment purposes.
- B may call Reliability Coordinator for TLR Procedure for all *non-firm* Interchange Transactions that contribute to the overload at Constraint #1.



1645

- Following the curtailment of all non-firm Interchange Transactions, the Reliability Coordinator (ies) will determine which Transmission Operator(s) will reconfigure their transmission, if possible, to mitigate constraint #1. (Principle 4)

1650



- A-D transaction may be curtailed as a result. However, the A-D transaction is treated as a firm Interchange Transaction and will be curtailed only after non-firm Interchange Transactions. (Note: This means that the firm contract path is respected by all parties, including those not on the contract path.) (Principle 4)

1655

Case 7: Two A-to-D transactions using A-B-C-D and A-E-C-D; A and B are non-firm; B has Constraint at #1

- B is not obligated to reconfigure transmission to mitigate Constraint at #1. (Principle 1)

1660

- B may call for TLR Procedure to relieve overload at Constraint #1.

- If both A – D Interchange Transactions have the same TDF across Constraint #1, then they both are subject to curtailment. However, Interchange Transaction A – D using the A-B-C-D path is assigned a higher priority (priority NW on B), and would not be curtailed until after the Interchange Transaction using the path A-E-C-D (priority NH on the contract path as observed by B who is off the contract path).

1665

NAESB Ratification Ballot for Wholesale Electric Quadrant Standards  
Wednesday, April 7, 2004

NAESB Member	Member Contact	R04005 (OASIS Baseline)		
		Support	Oppose	Abstain
<b>Wholesale Electric Quadrant</b>				
ACES Power Marketing LLC	Roy J. True			
Alabama Electric Cooperative, Inc.	Kenneth J. Skroback			
American Electric Power Marketing, Inc.	<b>Barbara Radous</b> , Joseph Hartsoe	Y		
American Electric Power Service Corp.	Thomas Ringenbach	Y		
American Electric Power Service Corp.	John Stough, <b>Michael Desselle</b>	Y		
American Municipal Power - Ohio, Inc.	Pat Frazier, Chris Norton			
American Transmission Company LLC	Julie Voeck			
Arizona Public Service Company	Mark W. Hackney			
Arkansas Electric Cooperative Corporation	Ricky Bittle			
Avista Corp.	Scott A. Waples			
Baltimore Gas & Electric Company	John J. Moraski, Ralph Bourquin			
Basin Electric Power Cooperative	Dan Klempel			
Basin Electric Power Cooperative	David Raatz			
Basin Electric Power Cooperative	Jason Doerr			
Basin Electric Power Cooperative	Ted Humann			
Bonneville Power Administration	Sydney D. Berwager			
Bonneville Power Administration	Fran Halpin	Y		
Bonneville Power Administration	Brenda Anderson			
Bonneville Power Administration	Barbara Rehman	Y		
BP America Inc.	Jeanne Zaiontz			
BP Energy Company	Jeanne Zaiontz			
Buckeye Power, Inc.	Peter H. Buros			
Calpine Corporation	William Taylor, Jim Stanton			
Cap Gemini Ernst and Young	Stephen A. Behrens (working on new contact)			
CenterPoint Energy	Paul Rocha			
Central Electric Power Cooperative	Arthur Fusco	Y		
Chevron/Texaco Energy Research and Technology	Carol Guthrie			
Cinergy	Walt Yeager, Ron Jackups			
Cinergy	Walt Yeager, Ron Jackups			
Cinergy	Ron Jackups			
Cleco Power, LLC	Keith Comeaux			
Columbus Southern Power Company	Barbara Radous, <b>Edward P. Cox</b>	Y		
Comprehensive Energy Services	Jim Templeton	Y		
Conectiv Energy Supply, Inc.	Gloria Ogenyi	Y		
Conectiv Energy Supply, Inc.	Gloria Ogenyi	Y		
Conectiv Power Delivery	Ken Gates	Y		
Constellation NewEnergy, Inc.	Sara O'Neill			
Consumers Energy Company	Andrew C. Dotterweich, Frank Johnson			
Consumers Energy Company	Steven L. Gaarde, Andrew C. Dotterweich, John J. Dellas			
Dairyland Power Cooperative	Chuck Callies			
Department of the Interior, Bureau of Reclamation	Deborah M. Linke			
Detroit Edison	David G. Nick			
Dominion Energy Marketing, Inc.	Lou Oberski	Y		
Duke Energy Corp.	Ollie Frazier			
Duke Energy North America	Bill D. Blevins			
Duke Energy North America	Lee Barrett			
Dynegy Marketing and Trade	Jason Cox			
Edison Electric Institute	David Owens, Dave Dworzak			
El Paso Corporation	Dennis M. Price			
El Paso Merchant Energy	Sam Beason			
Electric Reliability Council of Texas (ERCOT)	Sam R. Jones			
Electricity Consumers Resource Council (ELCON)	John Anderson, <b>John Hughes</b>	Y		
Empire District Electric Company, The	Bary K. Warren			
Energy East Management Corporation	Marjorie Perlman			
Entergy Services, Inc.	<b>Edward J. Davis</b> , John H. Zemanek	Y		
Entergy Services, Inc.	F. Jay Poche			
Exelon Corporation - PECO Energy	John F. Leonard, Jr.			
Exelon Generation - Power Team	Regina Carrado	Y		
Exelon Generation Company LLC	Regina Carrado	Y		
ExxonMobil Gas Marketing	Steve Sayuk			
Florida Municipal Power Agency	Rick Casey			
Florida Municipal Power Agency	Steven H. McElhaney			
Florida Power & Light Company	Joe Stepenovitch			
Florida Power & Light Company	Marty Mennes			

NAESB Ratification Ballot for Wholesale Electric Quadrant Standards  
Wednesday, April 7, 2004

NAESB Member	Member Contact	R04005 (OASIS Baseline)		
		Support	Oppose	Abstain
Georgia Transmission Corporation	Carol Hester			
Hydro - Quebec Transenergie	Victor Bissonnette	Y		
Hydro One Networks	Dave Barrie			
Indiana Municipal Power Agency	Dick Foltz			
International Transmission Company	Jim D. Cyrulewski	Y		
Maryland Peoples Counsel	Patricia Smith			
Michigan Electric Transmission Company LLC	Charles V. Waits			
Michigan Public Power Agency	James R. Nickel, Daniel E. Cooper			
Midwest Independent Transmission System Operator	Bill Phillips			
Mirant Corp.	Susann D. Felton, <b>Alan Johnson</b>	Y		
Missouri River Energy Services	Brian Zavesky			
Modesto Irrigation District	Roge Van Hoy			
National Association of Regulatory Utility Commissioners	Lou Ann Westerfield	Y		
National Grid USA	Masheed Rosenqvist			
National Rural Electric Cooperative Assoc.	Barry Lawson			
New York State Dept. of Public Service	William Heinrich	Y		
North Carolina Eastern Municipal Power Agency	Gregory Locke			
North Carolina Electric Membership Corporation	David Beam			
North Carolina Electric Municipal Power Agency #1	Clay A. Norris	Y		
North Carolina Electric Municipal Power Agency #1	Andrew Fusco			
Northeast Utilities Service Company	David Boguslawski, William P. McKinnon			
NRG Power Marketing, Inc.	Steve Corneli			
Oglethorpe Power Corporation	Billy Ussery			
Ohio Consumers Council	Randy Corbin			
Old Dominion Electric Cooperative	James N. Kimball			
Oncor	Ellis Rankin			
Ontario Power Generation	Barry Green			
Ontario Power Generation	Ron Robinson			
Open Access Technology International, Inc.	Kevin Burns			
PacifiCorp	Alec Burden			
PacifiCorp	Edison G. Elizeh			
PacifiCorp	Greg Maxfield			
PacifiCorp	<b>Jim Hicks</b> , Darrell Gerrard	Y		
PG&E National Energy Group	Dede Hapner (no longer primary contact)			
Platte River Power Authority	Terry L. Baker			
Portland General Electric	Ferri Peschka			
PPL Electric Utilities Corporation	Ray Mammarella			
PPM Energy, Inc.	Don Winslow			
PPM Energy, Inc.	Don Winslow			
Praxair, Inc.	James B. Rouse, David Meade			
Progress Energy	Benjamin Crisp			
Progress Energy	Philip Lewis			
Progress Energy	Michael Settlege			
Progress Energy	Verne Ingersoll			
PSEG Energy Resources and Trade LLC	James D. Hebson		Y	
PSEG Power LLC	Gregory Eisenstark		Y	
Public Service Electric and Gas Company	Colin J. Loxley		Y	
Public Service Electric and Gas Company	Jeffrey C. Mueller		Y	
Public Utility District No. 1 of Chelan County	Doug Frazier			
Puget Sound Energy, Inc.	George Marshall, <b>Bob Harshbarger</b>			
Reliant Energy Services, Inc.	Charles Yeung			
Sacramento Municipal Utility District	Thomas Ingwers	Y		
Salt River Project Agricultural Improvement and Power District	Wendy Weathers, Mark B. Bonsall			
Salt River Project Agricultural Improvement and Power District	Steve Cobb			
Seminole Electric Cooperative, Inc.	Lane Mahaffey	Y		
Seminole Electric Cooperative, Inc.	Glenn Spurlock	Y		
Southeastern Power Administration	Bob Goss			
Southern California Edison	Ronald D. Nunnally			
Southern Company Services, Inc.	Gary Rozier, <b>Jim Miller</b> , Greg Butrus	Y		
Southern Company Services, Inc.	Tony A. Reed	Y		
Southern Company Services, Inc.	Joel Dison			
Southern Company Services, Inc.	<b>R.D. (Dean) Ulch</b> , John Lucas	Y		
Southwest Power Pool	Carl Monroe			
Southwest Transmission Cooperative, Inc.	Larry D. Huff			
Southwestern Power Administration	Forrest E. Reeves			

NAESB Ratification Ballot for Wholesale Electric Quadrant Standards  
 Wednesday, April 7, 2004

NAESB Member	Member Contact	R04005 (OASIS Baseline)		
		Support	Oppose	Abstain
Southwestern Power Administration	Stanley L. Mason			
Sunflower Electric Power Corporation	L. Christian Hauck, <b>Carroll Waggoner</b>	Y		
Tenaska, Inc.	Scott Helyer		Y	
Tennessee Valley Authority	Ron L. Owens			
Tennessee Valley Authority	William F. Irish	Y		
Tennessee Valley Authority	Jim A. Ingraham			
Tennessee Valley Authority	Mitchell Needham, W. Terry Boston			
The Boeing Company	Steve LaFond			
TRANS-ELECT, INC.	Paul D. McCoy	Y		
Tri-State Generation and Transmission Association, Inc.	Bruce Sembrick			
Tri-State Generation and Transmission Association, Inc.	Thomas A. Smith			
TXU Business Services	Brad Jones, Jeff Shorter, Mike Grim			
UBS Energy LLC	Suzanne Calcagno			
Vermont Public Power Supply Authority	William J. Gallagher	Y		
We Energies	Linda Horn			
We Energies	James R. Keller			
Western Area Power Administration	Mark Fidrych	Y		
Western Area Power Administration	Jeffrey Ackerman			
Wisconsin Public Power Inc.	Mike Stuart			
Wisconsin Public Service Corporation	William Bourbonnais, Charles W. Severance			
Xcel Energy Inc.	Steven J. Beuning			
<b>Total Votes:</b>		34	5	0

	Votes Supporting	Votes Opposing	Abstentions	Percentage Affirmative Votes
<b>RESULTS</b>				
<b>Wholesale Gas Quadrant Members Voting:</b>	34	5	0	87.18%
<b>Total Votes:</b>	34	5	0	87.18%





NAESB Ratification Ballot for Wholesale Electric Quadrant Standards  
Thursday, December 30, 2004

NAESB Member			Member Contact			R04005A - OASIS Baseline Cleanup			R04011 - OASIS Requirements for FERC Order 2003 Large Generator Interconnection				R04005A - OASIS 1A Enhancements Standards of Conduct				R04006B - OASIS 1A Enhancements - Multiple Requests				R04006C - OASIS 1A Enhancements - Reducte			
			Support	Oppose	Abstain	Support	Oppose	Abstain	Support	Oppose	Abstain	Support	Oppose	Abstain	Support	Oppose	Abstain	Support	Oppose	Abstain				
e	reg	New York State Dept. of Public Service																						
d	muni	North Carolina Electric Membership Corporation																						
m	muni	North Carolina Electric Municipal Power Agency #1	Y			Y			Y			Y			Y						Y			
d	muni	North Carolina Electric Municipal Power Agency #1																						
t	iou	Northeast Utilities Service Company																						
g	muni	Oglethorpe Power Corporation																						
e	comres	Ohio Consumers' Counsel																						
g	muni	Old Dominion Electric Cooperative																						
g	merc	Ontario Power Generation																						
m	niou	Ontario Power Generation																						
e	enduse	Open Access Technology International, Inc.																						
m	iou	PacificCorp	Y			Y			Y			Y			Y						Y			
g	iou	PacificCorp																						
t	iou	PacificCorp	Y			Y			Y			Y			Y						Y			
t	muni	Platte River Power Authority																						
m	iou	Portland General Electric																						
t	iou	PPL Electric Utilities Corporation																						
m	iou	Progress Energy																						
t	iou	Progress Energy																						
m	iou	PSEG Energy Resources and Trade LLC																						
g	merc	PSEG Power LLC																						
d	nd	Public Service Electric and Gas Company																						
t	nd	Public Service Electric and Gas Company																						
t	niou	Puget Sound Energy, Inc.	Y			Y			Y			Y			Y						Y			
g	muni	Sacramento Municipal Utility District																						
d	muni	Sacramento Municipal Utility District	Y			Y			Y			Y			Y						Y			
d	other	Salt River Project Agricultural Improvement and Power District	Y			Y			Y			Y			Y						Y			
t	fed	Salt River Project Agricultural Improvement and Power District																						
g	muni	Seminole Electric Cooperative, Inc.																						
g	fed	Southeastern Power Administration																						
t	iou	Southern California Edison																						
d	iou	Southern Company Services, Inc.																						
g	iou	Southern Company Services, Inc.																						
m	iou	Southern Company Services, Inc.	Y			Y			Y			Y			Y						Y			
t	iou	Southern Company Services, Inc.																						
t	muni	Southwest Transmission Cooperative, Inc.																						
n	n	Southwest Power Pool																						
g	fed	Southwestern Power Administration																						
t	fed	Southwestern Power Administration																						
t	muni	Sunflower Electric Power Corporation																						
g	merc	Tenaska, Inc.	Y			Y			Y			Y			Y						Y			
d	other	Tennessee Valley Authority	Y			Y			Y			Y			Y						Y			
g	fed	Tennessee Valley Authority																						
m	fed	Tennessee Valley Authority																						
t	fed	Tennessee Valley Authority																						
t	inc	TRANS-ELECT, INC.	Y			Y			Y			Y			Y						Y			
t	muni	Tri-State Generation and Transmission Association, Inc.																						
m	niou	TXU Business Services	Y			Y			Y			Y			Y						Y			
t	iou	TXU Electric Delivery																						
m	niou	UBS Energy LLC																						
g	muni	Vermont Public Power Supply Authority	Y			Y			Y			Y			Y						Y			
t	fed	Western Area Power Administration																						
m	fed	Western Area Power Administration																						
d	iou	We Energies (Wisconsin Electric)																						
g	iou	We Energies (Wisconsin Electric)																						
d	muni	Wisconsin Public Power Inc.																						
g	iou	Wisconsin Public Service Corporation																						
m	iou	Xcel Energy Inc.																						
<b>Total Votes:</b>			26	0	1	27	0	0	26	0	1	26	0	1	26	0	1	27	0	0				
<b>RESULTS</b>			Votes Supporting				Votes Opposing				Percentage Abstentions				Percentage Affirmative Votes									
<b>Wholesale Electric Quadrant Members Voting:</b>			26	0	1	27	0	0	26	0	1	26	0	1	26	0	1	27	0	0				
<b>Total Votes:</b>			26	0	1	27	0	0	26	0	1	26	0	1	26	0	1	27	0	0				



NAESB Ratification Ballot for Wholesale Electric Quadrant Standards  
Friday, December 31, 2004

NAESB Member		Member Contact		RD4013 (Version 0 RPS) - Time Error Correction RP			RD4013 (Version 1 RPS) - Inadvertent Interchange RP			D13 (Version 0 RPS) - Area Control Error Equation Special Case			RD4013 (Version 0 RPS) - Coordinate Interchange RP			RD4013 (Version 0 RPS) - Transmission Loading Relief		
				Support	Oppose	Abstain	Support	Oppose	Abstain	Support	Oppose	Abstain	Support	Oppose	Abstain	Support	Oppose	Abstain
d	muni	North Carolina Electric Membership Corporation	David Besm															
m	muni	North Carolina Electric Municipal Power Agency #1	Clay A. Norris															
d	muni	North Carolina Electric Municipal Power Agency #1	Andrew Fusco															
t	iou	Northeast Utilities Service Company	David Boguslawski, Bill P. McKinnon															
g	muni	Oglethorpe Power Corporation	Billy Usery															
e	comres	Ohio Consumers' Counsel	Randy Corbin															
g	muni	Old Dominion Electric Cooperative	James N. Kimball															
g	merc	Ontario Power Generation	Barry Green	Y			Y			Y			Y			Y		
m	niou	Ontario Power Generation	Rob Robinson															
e	enduse	Open Access Technology International, Inc.	Kevin Burns															
m	iou	PacificCorp	Edison G. Elizeh															
g	iou	PacificCorp	Greg Maxfield															
t	iou	PacificCorp	Jim Hicks, Darrell Gerrard															
t	muni	Platte River Power Authority	Terry L. Baker															
m	iou	Portland General Electric	Terri Peschka															
t	iou	PPL Electric Utilities Corporation	Ray Mammarella															
m	iou	Progress Energy	Michael Settlage															
t	iou	Progress Energy	Verne Ingersoll, Phillip W. Lewis															
m	iou	PSEG Energy Resources and Trade LLC	James D. Hebson	Y			Y			Y			Y			Y		
g	merc	PSEG Power LLC	Thomas M. Piascik	Y			Y			Y			Y			Y		
d	nd	Public Service Electric and Gas Company	Colin J. Looney	Y			Y			Y			Y			Y		
t	nd	Public Service Electric and Gas Company	Jeffrey C. Mueller	Y			Y			Y			Y			Y		
t	niou	Puget Sound Energy, Inc.	George Marshall, Bob Harshbarger		Y		Y			Y			Y			Y		
g	muni	Sacramento Municipal Utility District	Thomas Ingwers															
d	muni	Sacramento Municipal Utility District	Robert D. Schwerman	Y			Y			Y			Y			Y		
d	other	Salt River Project Agricultural Improvement and Power District	Wendy Weathers, Mark B. Bonsall	Y			Y			Y			Y			Y		
t	fed	Salt River Project Agricultural Improvement and Power District	Steve Cobb	Y			Y			Y			Y			Y		
g	muni	Seminole Electric Cooperative, Inc.	Lane Mahaffey															
g	fed	Southeastern Power Administration	Bob Goss															
t	iou	Southern California Edison	Ronald D. Nunnally	Y			Y			Y			Y			Y		
d	iou	Southern Company Services, Inc.	Gary Rostler, Jim Miller, Greg Butrus	Y			Y			Y			Y			Y		
g	iou	Southern Company Services, Inc.	Tony A. Reed	Y			Y			Y			Y			Y		
m	iou	Southern Company Services, Inc.	Joel Dixon	Y			Y			Y			Y			Y		
t	iou	Southern Company Services, Inc.	R.D. (Dess) Ulich, John Lucas	Y			Y			Y			Y			Y		
t	muni	Southwest Transmission Cooperative, Inc.	Larry D. Huff															
n	n	Southwest Power Pool	Carl Monroe	Y			Y			Y			Y			Y		
g	fed	Southwestern Power Administration	Forrest E. Reeves															
t	fed	Southwestern Power Administration	Stanley L. Mason															
t	muni	Sunflower Electric Power Corporation	L. Earl Watkins, Carroll Waggoner	Y			Y			Y			Y			Y		
g	merc	Tenaska, Inc.	Scott Helyer															
d	other	Tennessee Valley Authority	Don L. Owens															
g	fed	Tennessee Valley Authority	William F. Irish															
m	fed	Tennessee Valley Authority	Jim A. Ingraham															
t	fed	Tennessee Valley Authority	Mitchell Needham, W. Terry Boston															
t	ite	TRANS-ELECT, INC.	Paul D. McCoy															
t	muni	Tri-State Generation and Transmission Association, Inc.	Bruce Sembriek															
m	niou	TXU Business Services	Elizabeth Howland	Y			Y			Y			Y			Y		
t	iou	TXU Electric Delivery	Ellis Rankin, Debbie McKeever															
m	niou	UBS Energy LLC	Suzanne Calcagno															
g	muni	Vermont Public Power Supply Authority	William J. Gallagher	Y			Y			Y			Y			Y		
t	fed	Western Area Power Administration	Mark Fidyich		Y			Y			Y			Y			Y	
m	fed	Western Area Power Administration	Jeffrey Ackerman															
d	iou	We Energies (Wisconsin Electric)	Linda Horn	Y			Y			Y			Y			Y		
g	iou	We Energies (Wisconsin Electric)	James R. Keller	Y			Y			Y			Y			Y		
d	muni	Wisconsin Public Power Inc.	Mike Stuart															
g	iou	Wisconsin Public Service Corporation	William Hourbonnais, Charles W. Severance															
m	iou	Xcel Energy Inc.	Steven J. Beuning															
<b>Total Votes:</b>				42	6	0	42	6	0	39	9	0	47	1	0	44	3	0
				Votes Supporting	Votes Opposing	Abstentions	Votes Supporting	Votes Opposing	Abstentions	Votes Supporting	Votes Opposing	Abstentions	Votes Supporting	Votes Opposing	Abstentions	Votes Supporting	Votes Opposing	Abstentions
<b>RESULTS</b>				87.50%			87.50%			81.25%			97.92%			93.62%		
<b>Wholesale Electric Quadrant Members Voting:</b>				42	6	0	42	6	0	39	9	0	47	1	0	44	3	0
<b>Total Votes:</b>				87.50%			87.50%			81.25%			97.92%			93.62%		

**NAESB WEQ RATIFICATION OF STANDARDS  
SUBMITTED NOVEMBER 19, 2004**

**HYDRO-QUÉBEC TRANSÉNERGIE COMMENTS  
December 30, 2004**

The following comments are provided following our vote submitted today by fax.

We wish to thank the drafters for the work accomplished on the proposed Business Standards.

Nevertheless, Hydro-Québec TransÉnergie submitted on November 5, 2004, comments on three of the standards, namely R04005A (Baseline cleanup), R04006A (Standards of Conduct) and R04006B (Multiple Requests). At its meeting on November 16, 2004, the WEQ Executive Committee decided that consideration of those comments would occur in subsequent revisions of the proposed Standards as "maintenance items". Therefore, we cannot vote in favour of those three Standards. Taking into account the fact that we agree with most of the rest of their contents, Hydro-Québec TransÉnergie will abstain from voting against them.

Submitted by Victor Bissonnette  
Délégué commercial  
Direction Commercialisation  
Hydro-Québec TransÉnergie

Attached to this email is my ballot on Recommendation R04013-Version 0 business practice standards that complement NERC's Version 0 reliability standards. I realize this is an up or down vote but I am submitting comments with my vote that I would like to be made part of the record on this vote.

I would like to take this time to express my gratitude to the member representatives and the NAESB staff who have devoted so much time and effort to develop these recommended business practice standards. The fact that I am voting against some of the proposals should not be interpreted as a lack of appreciation for their work on such a difficult and complex assignment.

### **Recommendation R04013 (Version 0 Business Practice Standards) - Time Error Correction Business Practices**

**Vote: No**

**Comment:**

In general BPA feels that time error correction is a reliability issue, not a commercial one. In the WECC, time error is (conceptually at least) continually being "corrected" through Automatic Time Error Control. The nature of the systems utilized to affect this control makes this a reliability concern. Time error is a useful indicator of performance of frequency control and frequency is a major driver for system control, again indicating that this is a reliability issue. Time Error Correction is accomplished through coordinated actions (as indicated in the standard itself) of the Reliability Coordinators and Balancing Authorities through an offset to the scheduled frequency. The language itself implies that this is reliability, not commercial and, as such, should be addressed in a NERC standard.

Beyond those reliability concerns, we have issues related to the document itself. The table illustrating the trigger points for manual time error correction does not reflect those triggers actually in practice in the WECC. The table shows a value of 2 seconds of error as the trigger point. WECC has not used this value for several years. The value currently used is +/- 5 seconds. **Without this correction the table is incorrect.** The value in the table should be changed prior to finalizing this standard.

Additionally there is language suggesting that no manual time error corrections for fast time should be initiated during the period from 0400 to 1100 Central Time. This limitation applies only to the Eastern Interconnection. Language needs to be added to provide that clarity.

### **Recommendation R04013 (Version 0 Business Practice Standards) - Inadvertent Interchange Business Practices**

**Vote: No**

**Comment:**

The method of Inadvertent Interchange Payback (via Automatic Time Error Control [ATEC]) in place within the WECC is intimately tied to reliability. It involves a modification of the Area Control Error equation. This equation is contained in the Energy Management Systems and Automatic Generation Control Systems of the member organizations. These systems and algorithms are the basis for controlling generation and managing reliability.

The Standard as written provides for "other methods" of Payback (see paragraph 1.2), implying that the agreed upon and "in practice" WECC ATEC would be an acceptable method of payback under the Standard. However, because of the nature of the systems used to calculate and implement the Inadvertent Interchange Payback, BPA does not believe that a voluntary standard or business practice is adequate to assure that Inadvertent Interchange gets settled in the prescribed manner.

BPA would like to have resolution of these issues prior to implementation of this standard. BPA feels that a re-consideration by the Joint Inadvertent Interchange Task Force is in order in the context of the stated reliability concerns with the WECC ATEC. One possible interim solution would be to include methods of payback which are closely tied to reliability (such as the WECC ATEC) as a NERC standard while bilateral payback via fixed schedules and financial settlements would be covered in this proposed NAESB Business Practice or it's successor.

**Recommendation R04013 (Version 0 Business Practice Standards) - Area Control Error Equation Special Cases Business Practices**

**Vote: No**

**Comment:** BPA has a concern that there needs to be one central process for development of standards associated with ACE. Such standards associated with generation control have significant reliability implications and the decision to split these standards between NERC and NAESB should be revisited. The ACE equation, including special cases, should all be addressed in a NERC reliability standard.

**Recommendation R04013 (Version 0 Business Practice Standards) - Coordinate Interchange Business Practices**

**Vote: Yes.**

No comment:

**Recommendation R04013 (Version 0 Business Practice Standards) - Transmission Loading Relief**

**Vote: Yes**

**Comment:** This yes vote is based on this Business Practice only applying to the Eastern Interconnection.

<<rat\_weq120104ballotberwager.doc>>

Syd Berwager  
Bonneville Power Administration  
NAESB Wholesale Electric Quadrant  
Load Serving Entity Segment  
Federal/State/Provincial Subsegment

Dear NAESB:

My filled-out member ratification ballot on Recommendation R04013-Version 0 business practice standards that complement NERC's Version 0 reliability standards, is attached to this email. In this email, I making comments regarding this vote that I would like to go into the record, although I understand the vote itself is a simple up-r-down vote on the proposal.

**Recommendation R04013 (Version 0 Business Practice Standards) - Time Error Correction Business Practices**

**Vote: No**

**Comment:**

In general BPA feels that time error correction is a reliability issue, not a commercial one. In the WECC, time error is (conceptually at least) continually being "corrected" through Automatic Time Error Control. The nature of the systems utilized to affect this control makes this a reliability concern. Time error is a useful indicator of performance of frequency control and frequency is a major driver for system control, again indicating that this is a reliability issue. Time Error Correction is accomplished through coordinated actions (as indicated in the standard itself) of the Reliability Coordinators and Balancing Authorities through an offset to the scheduled frequency. The language itself implies that this is reliability, not commercial and, as such, should be addressed in a NERC standard.

Beyond those reliability concerns, we have issues related to the document itself. The table illustrating the trigger points for manual time error correction does not reflect those triggers actually in practice in the WECC. The table shows a value of 2 seconds of error as the trigger point. WECC has not used this value for several years. The value currently used is +/- 5 seconds. **Without this correction the table is incorrect.** The value in the table should be changed prior to finalizing this standard.

Additionally there is language suggesting that no manual time error corrections for fast time should be initiated during the period from 0400 to 1100 Central Time. This limitation applies only to the Eastern Interconnection. Language needs to be added to provide that clarity.

**Recommendation R04013 (Version 0 Business Practice Standards) - Inadvertent Interchange Business Practices**

**Vote: No**

**Comment:**

The method of Inadvertent Interchange Payback (via Automatic Time Error Control [ATEC]) in place within the WECC is intimately tied to reliability. It involves a modification of the Area Control Error equation. This equation is contained in the Energy Management Systems and Automatic Generation Control Systems of the member organizations. These systems and algorithms are the basis for controlling generation and managing reliability.

The Standard as written provides for "other methods" of Payback (see paragraph 1.2), implying that the agreed upon and "in practice" WECC ATEC would be an acceptable method of payback under the Standard. However, because of the nature of the systems used to calculate and implement the Inadvertent Interchange Payback, BPA does not believe that a voluntary standard or business practice is adequate to assure that Inadvertent Interchange gets settled in the prescribed manner.

BPA would like to have resolution of these issues prior to implementation of this standard. BPA feels that a re-consideration by the Joint Inadvertent Interchange Task Force is in order in the context of the stated reliability concerns with the WECC ATEC. One possible interim solution would be to include methods of payback which are closely tied to reliability (such as the WECC ATEC) as a NERC standard while bilateral payback via fixed schedules and financial settlements would be covered in this proposed NAESB Business Practice or it's successor.

**Recommendation R04013 (Version 0 Business Practice Standards) - Area Control Error Equation Special Cases Business Practices**

**Vote: No**

**Comment:** BPA has a concern that there needs to be one central process for development of standards associated with ACE. Such standards associated with generation control have significant reliability



implications and the decision to split these standards between NERC and NAESB should be revisited. The ACE equation, including special cases, should all be addressed in a NERC reliability standard.

**Recommendation R04013 (Version 0 Business Practice Standards) - Coordinate Interchange Business Practices**

**Vote: Yes.**

No comment:

**Recommendation R04013 (Version 0 Business Practice Standards) - Transmission Loading Relief**

**Vote: Yes**

**Comment:** This yes vote is based on this Business Practice only applying to the Eastern Interconnection.

**NAESB Membership Ratification Ballot for Wholesale Electric Quadrant Standards**

**Due December 31, 2004**

**To NAESB Office (Fax Number 713-356-0067, email [naesb@naesb.org](mailto:naesb@naesb.org))**

Please vote in favor of or in opposition to the Executive Committee (EC) action taken on November 30, 2004:

<b>Support</b>	<b>Oppose</b>	<b>Action:</b>
	X	<b>Recommendation R04013 (Version 0 Business Practice Standards) - Time Error Correction Business Practices:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a5.doc">http://www.naesb.org/protected/rat_weq120104a5.doc</a>
	X	<b>Recommendation R04013 (Version 0 Business Practice Standards) - Inadvertent Interchange Business Practices:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a4.doc">http://www.naesb.org/protected/rat_weq120104a4.doc</a>
	X	<b>Recommendation R04013 (Version 0 Business Practice Standards) - Area Control Error Equation Special Cases Business Practices:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a2.doc">http://www.naesb.org/protected/rat_weq120104a2.doc</a>
X		<b>Recommendation R04013 (Version 0 Business Practice Standards) - Coordinate Interchange Business Practices:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a3.doc">http://www.naesb.org/protected/rat_weq120104a3.doc</a>
X		<b>Recommendation R04013 (Version 0 Business Practice Standards) - Transmission Loading Relief:</b> Adopt Business Practice Standards that support NERC's Reliability Standards and functional model terminology reflective of today's implementation. <a href="http://www.naesb.org/protected/rat_weq120104a6.doc">http://www.naesb.org/protected/rat_weq120104a6.doc</a>

Member Name:	Brenda Anderson_____
Member Signature:	_/S/ Brenda Anderson_____
Member Company:	Bonneville Power Administration_____
Segment:	WEQ – Marketer/Broker Segment/Fed-State-Prov Subsegment
Date:	12/17/04_____

**From:** Halpin, Francis J - PGS  
**Sent:** Thursday, December 23, 2004 1:58 PM  
**To:** NAESB  
**Cc:** Halpin, Francis J - PGS  
**Subject:**

Attached to this email is my ballot on Recommendation R04013-Version 0 business practice standards that complement NERC's Version 0 reliability standards. I realize this is an up or down vote but I am submitting comments with my vote that I would like to be made part of the record on this vote.

I would like to take this time to express my gratitude to the member representatives and the NAESB staff who have devoted so much time and effort to develop these recommended business practice standards. The fact that I am voting against some of the proposals should not be interpreted as a lack of appreciation for their work on such a difficult and complex assignment.

**On Recommendation R04013 (Version 0 Business Practice Standards) - Time Error Correction Business Practices:**

**Comment:**

In general BPA feels that time error correction is a reliability issue, not a commercial one. In the WECC, time error is (conceptually at least) continually being "corrected" through Automatic Time Error Control. The nature of the systems utilized to affect this control makes this a reliability concern. Time error is a useful indicator of performance of frequency control and frequency is a major driver for system control, again indicating that this is a reliability issue. Time Error Correction is accomplished through coordinated actions (as indicated in the standard itself) of the Reliability Coordinators and Balancing Authorities through an offset to the scheduled frequency. The language itself implies that this is reliability, not commercial and, as such, should be addressed in a NERC standard.

Beyond those reliability concerns, we have issues related to the document itself. The table illustrating the trigger points for manual time error correction does not reflect those triggers actually in practice in the WECC. The table shows a value of 2 seconds of error as the trigger point. WECC has not used this value for several years. The value currently used is +/- 5 seconds. **Without this correction the table is incorrect.** The value in the table should be changed prior to finalizing this standard.

Additionally there is language suggesting that no manual time error corrections for fast time should be initiated during the period from 0400 to 1100 Central Time. This limitation applies only to the Eastern Interconnection. Language needs to be added to provide that clarity.

**Recommendation R04013 (Version 0 Business Practice Standards) - Inadvertent Interchange Business Practices**

**Comment:**

The method of Inadvertent Interchange Payback (via Automatic Time Error Control [ATEC]) in place within the WECC is intimately tied to reliability. It involves a modification of the Area Control Error equation. This equation is contained in the Energy Management Systems and Automatic

Generation Control Systems of the member organizations. These systems and algorithms are the basis for controlling generation and managing reliability.

The Standard as written provides for "other methods" of Payback (see paragraph 1.2), implying that the agreed upon and "in practice" WECC ATEC would be an acceptable method of payback under the Standard. However, because of the nature of the systems used to calculate and implement the Inadvertent Interchange Payback, BPA does not believe that a voluntary standard or business practice is adequate to assure that Inadvertent Interchange gets settled in the prescribed manner.

BPA would like to have resolution of these issues prior to implementation of this standard. BPA feels that a re-consideration by the Joint Inadvertent Interchange Task Force is in order in the context of the stated reliability concerns with the WECC ATEC. One possible interim solution would be to include methods of payback which are closely tied to reliability (such as the WECC ATEC) as a NERC standard while bilateral payback via fixed schedules and financial settlements would be covered in this proposed NAESB Business Practice or it's successor.

**Recommendation R04013 (Version 0 Business Practice Standards) - Area Control Error Equation Special Cases Business Practices**

**Comment:** BPA has a concern that there needs to be one central process for development of standards associated with ACE. Such standards associated with generation control have significant reliability implications and the decision to split these standards between NERC and NAESB should be revisited. The ACE equation, including special cases, should all be addressed in a NERC reliability standard.

*Francis J. Halpin  
Bonneville Power Administration  
Generation Scheduling*

NAESB Version 0  
Comments of the Bonneville Power Administration Transmission Business Line

In general, BPA supports the NAESB goal of developing standard business practices to compliment and support NERC standards development. However, with respect to NAESB development of standards that may have reliability impacts, we have the following concerns:

**ACE, Time Error Correction, and Inadvertent Interchange Payback**

**ACE**

BPA has a concern that there needs to be one central process for development of standards associated with ACE. Such standards associated with generation control have significant reliability implications and the decision to split these standards between NERC and NAESB should be revisited. The ACE equation, including special cases, should all be addressed in a NERC reliability standard.

**Inadvertent Interchange Payback**

The method of Inadvertent Interchange Payback (via Automatic Time Error Control [ATEC]) in place within the WECC is intimately tied to reliability. It involves a modification of the Area Control Error equation. This equation is contained in the Energy Management Systems and Automatic Generation Control Systems of the member organizations. These systems and algorithms are the basis for controlling generation and managing reliability.

The Standard as written provides for "other methods" of Payback (see paragraph 1.2), implying that the agreed upon and "in practice" WECC ATEC would be an acceptable method of payback under the Standard. However, because of the nature of the systems used to calculate and implement the Inadvertent Interchange Payback, BPA does not believe that a voluntary standard or business practice is adequate to assure that Inadvertent Interchange gets settled in the prescribed manner.

BPA would like to have resolution of these issues prior to implementation of this standard. BPA feels that a re-consideration of the Joint Inadvertent Interchange Task Force (JIITF) decision is in order in the context of the stated reliability concerns with the WECC ATEC. One possible interim solution would be to include methods of payback which are closely tied to reliability (such as the WECC ATEC) as a NERC standard while bilateral payback via fixed schedules and financial settlements would be covered in this proposed NAESB Business Practice or it's successor.

**Manual Time Error Correction**

In general BPA feels that time error correction is a reliability issue, not a commercial one. In the WECC, time error is (conceptually at least) continually being "corrected" through Automatic Time Error Control. The nature of the systems utilized to affect this control makes this a reliability concern. Time error is a useful indicator of performance of

frequency control and frequency is a major driver for system control, again indicating that this is a reliability issue. Manual Time Error Correction is accomplished through coordinated actions (as indicated in the standard itself) of the Reliability Coordinators and Balancing Authorities through an offset to the scheduled frequency. The language itself implies that this is reliability, not commercial and, as such, should be addressed in a NERC standard.

Beyond those reliability concerns, we have issues related to the document itself. The table illustrating the trigger points for manual time error correction does not reflect those triggers actually in practice in the WECC. The table shows a value of 2 seconds of error as the trigger point. WECC has not used this value for several years. The value currently used is +/- 5 seconds. **Without this change the table is incorrect.** The value in the table should be corrected prior to finalizing this standard.

Additionally, there is language suggesting that no manual time error corrections for fast time should be initiated during the period from 0400 to 1100 Central Time. This limitation applies to the East. Language needs to be added to clarify the fact that this applies to the Eastern Interconnection only.



## **NORTH AMERICAN ENERGY STANDARDS BOARD**

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December 10, 2004

Fellow WEQ Members,

As Chairman and CEO of the North American Energy Standards Board and on behalf of the Wholesale Electric Quadrant (WEQ) Board Members, I am writing to urge each of you to cast your ballots supporting adoption of the NAESB Version "0" business practices standards currently out for member ratification. These NAESB practices complement the North American Electric Reliability Council's (NERC) Version "0" reliability standards. The WEQ Business Practices Subcommittee (BPS) and the WEQ Executive Committee (EC) unanimously approved these standards in November.

As you all are aware, the NAESB Version "0" standards are a translation of business practices elements embodied in NERC's existing operating policies. The goal of the translation effort was to effect no substantive changes to such practices as they existed in NERC's operating policies. The identification, referral to NAESB and subsequent translation of those business practices was performed in cooperation with NERC. Accordingly, NERC's Version "0" reliability standards will no longer contain the business practices previously embodied in their operating policies. This is an additional reason why it is critically important to adopt NAESB's Version "0" business practice standards: to ensure that no business practice gaps exist in reliable operations.

Adopting NAESB's Version "0" standards will not end our efforts to improve our business practices and develop new ones to complement reliability but provides the foundation for continued development using our ANSI-approved standards development process. In fact, the NAESB Board met yesterday and approved the 2005 WEQ Annual Plan. Among other specific annual plan tasks is a highest priority action item to modify NAESB Version "0" standards to reflect today's market operations that were not explicitly represented in NERC's current operating policies and hence were not translated by NAESB. That effort is already underway and I encourage each of you to join in and become active participants.

With this in mind, I want to encourage each of you to return your ratification ballot supporting the WEQ BPS and EC adoption of Version "0" standards by the December 31, 2004 deadline.

Best Regards,

*Michael Desselle*

Michael Desselle  
Chairman and CEO, North American Energy Standards Board

**Appendix V: NAESB Wholesale Electric Quadrant Leadership  
and Membership**

WEQ Board of Directors membership and terms  
WEQ EC and EC Alternates membership and terms  
WEQ general membership



# North American Energy Standards Board

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Home Page: [www.naesb.org](http://www.naesb.org)

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## NORTH AMERICAN ENERGY STANDARDS BOARD 2004 BOARD TERMS – Wholesale Electric Quadrant

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<b>END USER SEGMENT</b>		<b>TERM END:</b>
John A. Anderson	Executive Director, Electricity Consumers Resource Council (ELCON)	Dec 31, 2005
Jeanne Zaiontz	Director, Regulatory Affairs, BP Energy Co.	Dec 31, 2004
Carol Guthrie	General Manager, Electric Market Strategies, ChevronTexaco Energy Research and Technology Company	Dec 31, 2004
Patricia Smith	People's Counsel, Maryland People's Counsel	Dec 31, 2005
Ron Jackups	Vice President, Electric System Operations, Cinergy	Dec 31, 2005
Thomas Dunleavy	Commissioner, New York Public Service Commission	Dec 31, 2004

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<b>DISTRIBUTION/LSE SEGMENT</b>		<b>TERM END:</b>
Frank Johnson	Senior Vice President Electric Transmission and Distribution, Consumers Energy	Dec 31, 2005
Jim Miller	Vice President & General Counsel, Southern Company Services Inc.	Dec 31, 2004
Barry R. Lawson	Manager-Power Delivery, National Rural Electric Cooperative Association	Dec 31, 2005
Arthur G. Fusco	Vice President and General Counsel, Central Electric Power Cooperative Inc.	Dec 31, 2004
Mark B. Bonsall	Chief Financial Executive/Associate General Manager, Salt River Project	Dec 31, 2005
Carrie Cullen Hitt	Vice President of Governmental and Regulatory Affairs, Constellation NewEnergy	Dec 31, 2004

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<b>GENERATION SEGMENT</b>		<b>TERM END:</b>
Forrest E. Reeves	Assistant Administrator, Office of Corporate Operations, Southwestern Power Administration	Dec 31, 2004
Charles W. Severance	Director Bulk Power, Wisconsin Public Service Corporation	Dec 31, 2005
John J. Dellas	Executive Director Electric Restructuring, Consumers Energy	Dec 31, 2004
Dennis Sobieski	Managing Director – Business Development, PSEG Power	Dec 31, 2005
Thomas Ingwers	Director, Energy Trading and Contracts, Sacramento Municipal Utility District	Dec 31, 2005
Gloria Ogenyi	Director Energy and Market Policy, Conectiv Energy Supply, Inc.	Dec 31, 2004

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<b>TRANSMISSION SEGMENT</b>		<b>TERM END:</b>
W Terry Boston	Executive Vice President – Transmission/Power Supply Group, Tennessee Valley Authority	Dec 31, 2004
Peter Flynn	Vice President Transmission Strategy and Policy, National Grid USA	Dec 31, 2005
Paul McCoy	Executive Vice President of Transmission System Operations, Trans-Elect	Dec 31, 2004
Carroll Waggoner	Sr. Manager Transmission Policy, Sunflower Electric Power Corporation	Dec 31, 2005
John H. Zemanek	Vice President Transmission, Entergy Services, Inc.	Dec 31, 2004
<b>Michael Desselle</b>	Director Public Policy, American Electric Power	Dec 31, 2005

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<b>MARKETER/BROKER SEGMENT</b>		<b>TERM END:</b>
Allen L. Burns	Executive Vice President-Industry Restructuring, Bonneville Power Administration	Dec 31, 2005
R. Scott Brown	Vice President and Director, Exelon Generation Power Team	Dec 31, 2005
Thomas A. Smith	Manager of Power Marketing, Tri-State Generation & Transmission Association, Inc.	Dec 31, 2004
Jim Mayhew	Director of Market Development & Policy Analysis, Mirant Corp.	Dec 31, 2005
Michael Grim	Director of North American Market Development – Public Policy Division, TXU Energy	Dec 31, 2004
Joseph Hartsoe	Vice President and Associate General Counsel, American Electric Power Service Corp.	Dec 31, 2004



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**NORTH AMERICAN ENERGY STANDARDS BOARD  
2004 EXECUTIVE COMMITTEE TERMS – Wholesale Electric Quadrant  
As of December 8, 2004**

<b>End User Segment</b>		<b>Term</b>	<b>Sub-Segment</b>
John Hughes	Director Technical Affairs, Electricity Consumers Resource Council (ELCON)	12-31-2005	Large Industrial
V A C A N C Y	V A C A N C Y	12-31-2004	Large Industrial
Steve Sayuk	Manager Americas Supply, Power & Gas Services Group, ExxonMobil Power & Gas Services, Inc.	12-31-2004	End Use (Self Generation)
Randy Corbin	Assistant Director Analytical Services, Ohio Consumers' Counsel	12-31-2005	Commercial/Residential
Paul Jett	Manager of Electric System Operation Customer Choice Transition, Cinergy Services Inc.	12-31-2005	End Use (In other segments as well)
Lou Ann Westerfield	Policy Strategist, Idaho Public Utilities Commission, rep. National Association of Regulatory Utility Commissioners	12-31-2004	Regulators
<b>Distribution/LSE Segment</b>		<b>Term</b>	<b>Sub-Segment</b>
Thomas Ringenbach	Manager Business Standards, American Electric Power Service Corporation	12-31-2004	IOU
Jack Leonard	Director, Transmission Management, Exelon PECO Energy	12-31-2005	IOU
V A C A N C Y	V A C A N C Y	12-31-2004	Muni/Coop
Daniel E. Cooper	Engineering Manager, Michigan Public Power Agency	12-31-2005	Muni/Coop
Syd Berwager	Industry Restructuring Project Manager, Bonneville Power Administration/Power Business Line	12-31-2005	Other
Jansen Pollock	Manager of Regulatory Affairs, Constellation NewEnergy	12-31-2004	Competitive Retailer
<b>Generation Segment</b>		<b>Term</b>	<b>Sub-Segment:</b>
Bob Goss	Deputy Assistant Administrator of Power Resources, Southeastern Power Administration	12-31-2004	Fed/State/Prov.
Louis Oberski	Director Electric Market Policy, Dominion Resource Services, Inc.	12-31-2004	IOU
Tony Reed	Project Manager, Southern Company Generation and Energy Marketing	12-31-2005	IOU
Barry Green	Director, Markets and Research Regulatory Affairs Division, Ontario Power Generation	12-31-2004	Merchant
Woody Saylor	Director Finance & Engineering Midwest Power Region, Calpine	12-31-2005	Merchant
William J. Gallagher	General Manager of Vermont Public Power Supply Authority	12-31-2005	Muni/Coop
<b>Marketer/Broker Segment</b>		<b>Term</b>	<b>Sub-Segment:</b>
Jim Ingraham	Tennessee Valley Authority	12-31-2005	Fed/State/Prov
Joel Dison	Manager- Market Policy, Southern Company	12-31-2005	IOU Affiliated

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Clay A. Norris	Division Director, Planning, North Carolina Municipal Power Agency #1	12-31-2004	Muni/Coop
Suzanne Calcagno	Director – Regulatory Compliance, UBS Energy LLC	12-31-2004	Not IOU Affiliated
Alan Johnson	Senior Policy Analyst, Mirant	12-31-2005	Not IOU Affiliated
Mark Tallman	Managing Director, Commercial & Trading, PacifiCorp	12-31-2004	IOU Affiliated

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<b>Transmission Segment</b>		<b>Term</b>	<b>Sub-Segment:</b>
Steven C. Cobb	Manager Transmission Services, Salt River Project	12-31-2004	Fed/State/Prov.
Darrell Gerrard	Vice President Transmission Systems, PacifiCorp	12-31-2004	IOU
John E. Lucas	Manager, Transmission Services, Southern Company	12-31-2005	IOU
Mary Ellen Paravalos	Director of Regulatory Policy, National Grid USA	12-31-2005	ITC
Dan Klempel	Director Transmission Regulatory Compliance, Basin Electric Power Cooperative	12-31-2005	Muni/Coop
Julie Voeck	Manager Strategic Policy and Planning, American Transmission Company	12-31-2004	ITC

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**NORTH AMERICAN ENERGY STANDARDS BOARD**  
**2004 EXECUTIVE COMMITTEE ALTERNATES – Wholesale Electric Quadrant**  
**As of November 23, 2004**

<b>End User Segment</b>		<b>Sub-Segment</b>
		Large Industrial
		Large Industrial
		End Use (Self Generation)
		Commercial/Residential
		End Use (In other segments as well)
Bill Heinrich	New York State Dept. of Public Service	Regulators
<b>Distribution/LSE Segment</b>		<b>Sub-Segment</b>
Sherri Monteith	Sr. Policy Analyst, American Electric Power	IOU
		IOU
Bob Williams	Director of Regulatory Affairs, Florida Municipal Power Association	Muni/Coop
Robert Schwermann	Sacramento Municipal Utility District	Muni/Coop
Tom McGrath	Tennessee Valley Authority	Other
Wendy Weathers	Principal Analyst, Salt River Project	Other
		Competitive Retailer
<b>Generation Segment</b>		<b>Sub-Segment:</b>
Francis Halpin	Bonneville Power Administration	Fed/State/Prov.
William F. Irish	Project Manager, Tennessee Valley Authority	Fed/State/Prov
Brian Evans-Mongeon	Manager, Power Supply and Marketing Services, Vermont Public Power Supply Authority	Muni/Coop
Scott Corse	Chairman, Board of Directors, Vermont Public Power Supply Authority	Muni/Coop
Roman Carter	Project Manager-Market Policy, Southern Company	IOU
		IOU
Tony Petrella	Ontario Power Generation	Merchant
		Merchant
<b>Marketer/Broker Segment</b>		<b>Sub-Segment:</b>
Jeff Ackerman	Manager, CRSP-Energy Mgmt., Western Area Power Administration	Fed/State/Prov
Brenda Anderson	Bonneville Power Administration	Fed/State/Prov
Edison G. Elizeh	PacifiCorp	IOU Affiliated
Greg Locke	Manager, Strategic Analysis, Electricities of North Carolina	Muni/Coop
Kathy York	Specialist - Energy Markets and Policy, Tennessee Valley Authority	Fed/State/Prov
Carol McCrary	Electricities (North Carolina Municipal Power Agency #1)	Muni/Coop
		Not IOU Affiliated
Phil Cox	Energy Market Coordinator Energy Trading, AEP	IOU Affiliated

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# North American Energy Standards Board

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Energy Services, Inc.

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<b>Transmission Segment</b>		<b>Sub-Segment:</b>
Barbara Rehman	Policy Manager, Bonneville Power Administration	Fed/State/Prov.
Mark Fidrych	Western Area Power Administration	Fed/State/Prov.
Jim Hicks	PacifiCorp	IOU
Mark Maher	PacifiCorp	IOU
Edward Davis	Policy Consultant, Entergy Services, Inc.	IOU
William O. Ball	Vice President, Transmission Planning, Policy and Support Services, Southern Company Services, Inc.	IOU
Dean Ulch	Principal Engineer, Southern Company Services, Inc.	IOU ITC Muni/Coop

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**North American Energy Standards Board Membership Report  
As of November 30, 2004**

**NAESB Wholesale Electric Quadrant Membership Report  
Quadrant and Segment Analysis**

Quadrant/Segment Membership Analysis		Number of Members
WEQ Segments	TOTAL	132
	End Users	11
	Distributors	23
	Transmission	40
	Generation	30
	Marketers	24
	None Specified	4

**North American Energy Standards Board Membership Report  
As of November 30, 2004**

NAESB Membership Statistics – Changes by Quadrant for 2004 as of December 1, 2004

WEQ	New Members:	5
	<i>TransElect, International Transmission Company, Sacramento Municipal Utility District, First Energy Solutions Corp., Navigant Consulting, Inc.</i>	
	Member Resignations:	30
	<i>ConEd (Distribution), ConEd (Transmission), Exelon Energy Delivery, SRP (Generation), SRP (Marketer), Reliant Energy Power Generation, Arizona Residential Utility Consumer Office, Texas Public Utility Commission, TransLink, Reliant Energy Services, Praxair, PG&amp;E National Energy Group, Detroit Edison, Progress Energy (Distribution), Progress Energy (Generation), Public Utility District No. 1 of Chelan County (Marketer), Center Point Energy (Transmission), Exelon Generation Company LLC (Generation), El Paso Corporation (Generation), El Paso Merchant Energy (Marketer), NRG Power Marketing, Inc. (Generation), Baltimore Gas &amp; Electric Company (Transmission), BP Energy, Co. (Marketer), Duke Energy North America (Marketer), Maryland People’s Counsel (End User), Tri-State Generation and Transmission (Marketer), PacifiCorp (Distribution), Seminole Electric Cooperative (Transmission), PPM Energy, Inc. (Generation), PPM Energy, Inc. (Marketer)</i>	



**North American Energy Standards Board Membership Report  
As of November 30, 2004**

**North American Energy Standards Board Membership List as of December 1, 2004**

<b>Quadrant</b>		<b>Organization</b>	<b>Segment</b>	<b>Contact</b>	<b>Sub-Segment</b>
<b>Wholesale Electric Quadrant:</b>	1	ACES Power Marketing LLC	m	Roy J. True	muni
	2	Alabama Electric Cooperative, Inc.	d	Kenneth J. Skroback	muni
	3	American Electric Power Service Corp.	m	Barbara Radous, Joseph Hartsoe	iou
	4	American Electric Power Service Corp.	d	Thomas Ringenbach	iou
	5	American Electric Power Service Corp.	t	John Stough, Michael Desselle	iou
	6	American Municipal Power - Ohio, Inc.	d	Pat Frazier, Chris Norton	muni
	7	American Transmission Company LLC	t	Julie Voeck	itc
	8	Arizona Public Service Company	t	Mark W. Hackney	iou
	9	Arkansas Electric Cooperative Corporation	g	Ricky Bittle	muni
	10	Avista Corp.	t	Scott A. Waples	
	11	Basin Electric Power Cooperative	t	Dan Klempel	muni
	12	Basin Electric Power Cooperative	m	David Raatz	nd
	13	Basin Electric Power Cooperative	g	Jason Doerr	muni
	14	Boeing Company	e	Steve LaFond	lind
	15	Bonneville Power Administration	d	Sydney D. Berwager	other
	16	Bonneville Power Administration	g	Francis Halpin	fed
	17	Bonneville Power Administration	m	Brenda Anderson	fed
	18	Bonneville Power Administration	t	Barbara Rehman	fed
	19	BP America Inc.	e	Jeanne Zaiontz	lind
	20	Buckeye Power, Inc.	d	Peter H. Buros	Nd
	21	Calpine Corporation	g	William Taylor, Jim Stanton	merc
	22	Cap Gemini Ernst and Young	m	Stephen A. Behrens	niou
	23	Central Electric Power Cooperative	d	Arthur Fusco	muni
	24	ChevronTexaco Energy Research and Technology	e	Carol Guthrie	sgen
	25	Cinergy	e	Ron Jackups	endues
	26	Cinergy	g	Walt Yeager, Ron Jackups	iou
	27	Cinergy	m	Walt Yeager, Ron Jackups	iou
	28	Cleco Power, LLC	t	Keith Comeaux	iou
	29	Columbus Southern Power Company	g	Phil Cox	merc
	30	Comprehensive Energy Services	e	Jim Templeton	enduse
	31	Conectiv Energy Supply, Inc.	g	Gloria Ogenyi	merc
	32	Conectiv Energy Supply, Inc.	m	Gloria Ogenyi	iou
	33	Conectiv Power Delivery	t	Ken Gates	iou
	34	Constellation NewEnergy, Inc.	d	Sara O'Neill	comp ret
	35	Consumers Energy Company	d	Andrew C. Dotterweich, Frank	iou

**North American Energy Standards Board Membership Report  
As of November 30, 2004**

Quadrant	Organization	Segment	Contact	Sub-Segment
			Johnson	
36	Consumers Energy Company	g	Steven L. Gaarde, Andrew C. Dotterweich, John J. Dellas	iou
37	Dairyland Power Cooperative	t	Chuck Callies	muni
38	Department of the Interior, Bureau of Reclamation	g	Deborah M. Linke	fed
39	Dominion Energy Marketing, Inc.	g	Lou Oberski	iou
40	Duke Energy Corp.	d	Ollie Frazier	iou
41	Duke Energy North America	g	Bill D. Blevins	merc
42	Dynegy Power Marketing, Inc.	g	Barry Huddleston	merc
43	Edison Electric Institute	n	David Owens, Dave Dworzak	N
44	Electric Reliability Council of Texas (ERCOT)	n	Sam R. Jones, Ray Giuliani	n
45	ElectriCities of North Carolina (North Carolina Eastern Municipal Power Agency)	g	Gregory Locke	muni
46	Electricity Consumers Resource Council (ELCON)	e	John Anderson, John Hughes	lind
47	Empire District Electric Company, The	t	Bary K. Warren	iou
48	Energy East Management Corporation	t	Marjorie Perlman	iou
49	Entergy Services, Inc.	t	Edward J. Davis	iou
50	Entergy Services, Inc.	m	James M. (Jimmy) Smith	iou
51	Exelon Corporation - PECO Energy	d	John F. Leonard, Jr.	iou
52	Exelon Generation - Power Team	m	Jack Crowley	iou
53	ExxonMobil Gas Marketing	e	Steve Sayuk, Mark Scheel, Mark Ulrich	sgen
54	FirstEnergy Solutions Corp.	M	Edward C. Stein	iou
55	Florida Municipal Power Agency	g	Rick Casey	muni
56	Florida Municipal Power Agency	d	Steven H. McElhaney	muni
57	Florida Power & Light Company	m	Joe Stepenovitch	iou
58	Florida Power & Light Company	t	Marty Mennes	iou
59	Florida Reliability Coordinating Council	t	Linda D. Campbell	iou
60	Georgia Transmission Corporation	t	Carol Hester	muni
61	Hydro One Networks	t	Dave Barrie	itc
62	Hydro – Quebec Transenergie	t	Victor Bissonnette	fed
63	Indiana Municipal Power Agency	g	Dick Foltz	muni
64	International Transmission Company	t	Jim D. Cyrulewski	itc
65	Michigan Electric Transmission Company LLC	t	Charles V. Waits	itc
66	Michigan Public Power Agency	d	James R. Nickel, Daniel E. Cooper	muni
67	Midwest Independent Transmission System Operator+J96	n	William (Bill) Phillips	n
68	Mirant Corp.	m	Susann D. Felton, Alan Johnson	niou
69	Missouri River Energy Services	d	Brian Zavesky	muni

**North American Energy Standards Board Membership Report  
As of November 30, 2004**

<b>Quadrant</b>	<b>Organization</b>	<b>Segment</b>	<b>Contact</b>	<b>Sub-Segment</b>
70	Modesto Irrigation District	t	Roge Van Hoy	muni
71	National Association of Regulatory Utility Commissioners	E	Lou Ann Westerfield	reg
72	National Grid USA	t	Masheed Rosenqvist, Peter Flynn, Mary Ellen Paravalos	itc
73	National Rural Electric Cooperative Assoc.		Barry Lawson	muni/coop
74	Navigant Consulting, Inc.	t	Richard G. Smead	iou
75	New York State Dept. of Public Service	e	William Heinrich	reg
76	North Carolina Electric Membership Corporation	d	David Beam	muni
77	North Carolina Electric Municipal Power Agency #1	m	Clay A. Norris	muni
78	North Carolina Electric Municipal Power Agency #1	d	Andrew Fusco	muni
79	Northeast Utilities Service Company	t	David Boguslawski, Bill P. McKinnon	iou
80	Oglethorpe Power Corporation	g	Billy Ussery	muni
81	Ohio Consumers' Counsel	e	Randy Corbin	comres
82	Old Dominion Electric Cooperative	g	James N. Kimball	muni
83	Ontario Power Generation	g	Barry Green	merc
84	Ontario Power Generation	m	Rob Robinson	niou
85	Open Access Technology International, Inc.	e	Kevin Burns	enduse
86	PacifiCorp	m	Edison G. Elizeh	iou
87	PacifiCorp	g	Greg Maxfield	iou
88	PacifiCorp	t	Jim Hicks, Darrell Gerrard	iou
89	Platte River Power Authority	t	Terry L. Baker	muni
90	Portland General Electric	m	Terri Peschka	iou
91	PPL Electric Utilities Corporation	t	Ray Mammarella	iou
92	Progress Energy	m	Micheal Settlage	iou
93	Progress Energy	t	Verne Ingersoll, Phillip W. Lewis	iou
94	PSEG Energy Resources and Trade LLC	m	James D. Hebson	iou
95	PSEG Power LLC	g	Thomas M. Piascik	merc
96	Public Service Electric and Gas Company	d	Colin J. Loxley	nd
97	Public Service Electric and Gas Company	t	Jeffrey C. Mueller	nd
98	Puget Sound Energy, Inc.	t	George Marshall, Bob Harshbarger	niou
99	Sacramento Municipal Utility District	d	Robert D. Schwermann	muni
100	Sacramento Municipal Utility District	g	Thomas Ingwers	muni
101	Salt River Project Agricultural Improvement and Power District	d	Wendy Weathers, Mark B. Bonsall	other
102	Salt River Project Agricultural Improvement and Power District	t	Steve Cobb	fed
103	Seminole Electric Cooperative, Inc.	g	Lane Mahaffey	muni

**North American Energy Standards Board Membership Report  
As of November 30, 2004**

<b>Quadrant</b>	<b>Organization</b>	<b>Segment</b>	<b>Contact</b>	<b>Sub-Segment</b>
104	Southeastern Power Administration	g	Bob Goss	fed
105	Southern California Edison	t	Ronald D. Nunnally	iou
106	Southern Company Services, Inc.	d	Garey Rozier, Jim Miller, Greg Butrus	iou
107	Southern Company Services, Inc.	g	Tony A. Reed	iou
108	Southern Company Services, Inc.	m	Joel Dison	iou
109	Southern Company Services, Inc.	t	R.D. (Dean) Ulch, John Lucas	iou
110	Southwest Transmission Cooperative, Inc.	t	Larry D. Huff	muni
111	Southwest Power Pool	n	Carl Monroe	n
112	Southwestern Power Administration	g	Forrest E. Reeves	fed
113	Southwestern Power Administration	t	Stanley L. Mason	fed
114	Sunflower Electric Power Corporation	t	L. Earl Watkins, Carroll Waggoner	muni
115	Tenaska, Inc.	g	Scott Helyer	merc
116	Tennessee Valley Authority	d	Ron L. Owens	other
117	Tennessee Valley Authority	g	William F. Irish	fed
118	Tennessee Valley Authority	m	Jim A. Ingraham	fed
119	Tennessee Valley Authority	t	Mitchell Needham, W. Terry Boston	fed
120	TRANS-ELECT, INC.	t	Paul D. McCoy	itc
121	Tri-State Generation and Transmission Association, Inc.	t	Bruce Sembrick	muni
122	TXU Business Services	m	Elizabeth Howland	niou
123	TXU Electric Delivery	t	Ellis Rankin, Deborah McKeever	iou
124	UBS Energy LLC	m	Suzanne Calcagno	niou
125	Vermont Public Power Supply Authority	g	William J. Gallagher	muni
126	Western Area Power Administration	t	Mark Fidrych	fed
127	Western Area Power Administration	m	Jeffrey Ackerman	fed
128	We Energies (Wisconsin Electric)	d	Linda Horn	iou
129	We Energies (Wisconsin Electric)	g	James R. Keller	iou
130	Wisconsin Public Power Inc.	d	Mike Stuart	muni
131	Wisconsin Public Service Corporation	g	William Bourbonnais, Charles W. Severance	iou
132	Xcel Energy Inc.	m	Steven J. Beuning	iou

## **Appendix VI: Transcripts**

Transcripts for the following meetings are available. Please contact the NAESB Office ([naesb@naesb.org](mailto:naesb@naesb.org)) for detailed information on how to obtain the transcripts.

### Wholesale Electric Quadrant Executive Committee Meetings:

February 24, 2004  
November 16, 2004  
November 30, 2004

### Joint Interface Committee Meetings:

February 18-19, 2004  
July 16, 2004  
August 16, 2004



## North American Energy Standards Board

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January 13, 2005

**TO:** Interested Industry Participants  
**FROM:** Todd Oncken, NAESB Deputy Director  
**RE:** Procedures for ordering transcripts of NAESB meetings

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Dear Interested Industry Participants,

It is NAESB's policy to transcribe meetings of the NAESB Board of Directors, NAESB Executive Committees, and Joint Interface Committee. Transcripts can be ordered directly from the transcription service. Please contact the NAESB office (713-356-0060 or [vthomason@naesb.org](mailto:vthomason@naesb.org)) for assistance in ordering transcripts.

Best Regards,

*Todd*

Todd Oncken,  
NAESB Deputy Director