
From: Joel Dison, Southern Company
Sent: Friday, April 16, 2004 9:39 AM
To: Carter, Roman; Veronica Thomason; weqess@naesb.org; Oncken, Todd
Cc: Rae Mcquade; Robert Schwermann; Ed Davis; Simonelli, John; Andy Rodriguez
Subject: Revised CIBP Standard

Dear ESS:

Although I am exceedingly appreciative of the CIBPTF's efforts in resolving industry concerns with this standard, I would like to express my personal concerns over the newly revised document (the one posted yesterday) and inform the group that I will probably vote *AGAINST* adoption of the standard as written. This version was changed to address an implementation concern expressed by Entergy. The change is in Standard 5.0. However, in my opinion, the change creates a fatal flaw in the standard that I cannot support. As written, Standard 5.0 says:

The completed RFI shall be submitted to the IA and concurrently to all involved parties in accordance with the timing requirements of the most current version of the **NAESB RFI Submission and Response Timetables** (attached).

It is my opinion that the phrase "concurrently" specifies a given implementation that will (1) unduly restrain the ongoing development of OASIS II, (2) represents a fundamental change to Policy 3, and (3) creates a situation in which the existing ETAG specification and implementation would be in violation of the standard. Entergy's concern is over the situation in which, because of the timing of RFI submissions to the various reliability entities, the IA receives an approval for an RFI that it has not yet seen. This is a legitimate implementation concern that has already been addressed by ETAG and will most certainly be addressed by any other implementation such as OASIS II. If passed as written, however, ETAG would be in violation of this standard because the tag is first sent to the tag authority (which serves as the equivalent of both the market assembly function and the IA) which then sends it to all reliability approval entities - all happening in accordance with the timing tables. It has been expressed that certain language in other parts of the standard "forgive" this violation because they specify transitional use of the ETAG specification document. I disagree for this piece of the standard. Standard 4.1 says that the Tag Authority can serve as the Market Assembly function; Standard 7.1 says that the Tag Authority can serve as the communication vehicle for status changes; and Standard 8.3 says that the "most current" version of the ETAG specification document shall be used as the protocol for submitting the RFI to the IA. None of these forgive the requirement in Standard 5.0 to send to reliability authorities concurrently to sending to the IA and therefore passage of this standard would require a change to the ETAG specification document. In addition, the language as written will force the OASIS II development team to either (a) limit its scope of possible designs or (b) initiate a change to this standard anyway. It is my opinion that, since the ETAG specification document already handles the implementation concerns expressed by Entergy, there is no reason to force this change. As such, I suggest the original wording that did not specify concurrently:

The completed RFI shall be submitted to the IA and to all involved parties in accordance with the timing requirements of the most current version of the **NAESB RFI Submission and Response Timetables** (attached).

By copy of this email to Veronica and Todd, I want to be certain that this discussion is captured and documented. Thanks.

To the ESS, please give consideration to this discussion prior to the conference call. Thanks.

Joel Dison Manager, Market Policy
Southern Company Generation and Energy Marketing

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

From: Carter, Roman

Sent: Thursday, April 15, 2004 11:50 AM

To: Veronica@Naesb (vthomason@naesb.org)

Cc: Rae McQuade (rmcquade@naesb.org); Robert Schwermann; Ed Davis; Dison, Joel; Simonelli, John; Andy Rodriguez

Subject:

Veronica, I have made a slight change to the CIBP Standard currently posted on the website for the ESS Conference Call scheduled for tomorrow. Would you please replace the [CIBP Standard.doc](#) with the attached [CIBP Standard revised.doc](#).

Thanks for your help....

Roman Carter
Southern Company Generation
& Energy Marketing