

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

**From:** Rodriquez, Andrew J.

**Sent:** Friday, April 16, 2004 12:54 PM

**To:** 'Simonelli, John'; 'Dison, Joel'; Carter, Roman; vthomason@naesb.org; weqess@naesb.org; Oncken, Todd

**Cc:** rmcquade@naesb.org; Robert Schwermann; Ed Davis; Andy Rodriguez

**Subject:** RE: Revised CIBP Standard

Throwing my two cents in....

I would go one step further than John. As a compromise document, I can see that a lot has been done here, and I don't mean to imply that is is not good work or work wasted. But I nonetheless of question if the right things have been done.

As I have suggested before, I would greatly prefer to see two documents:

- 1.) Business Practice Standards for Interchange Scheduling, and
- 2.) Business Practice Standards for the E-Tag System

Number 1 should contain implementation neutral things, like "we'll use block accounting," and "schedules must be balanced before flowing."

Number 2 should contain all the things about timing and data requirements, approvals, delivery, etc...

The reason I am saying this is that there is a LOT of stuff in the CIBP document that is not about coordinating interchange; it's about using tagging. Coordinate Interchange standards should apply regardless of whether you are using E-Tag, faxes, or smoke signals. I agree that we need to codify E-Tag rules - but they are NOT the same as Interchange rules, and we should not blur that line by calling them the same thing.

As I articulated in the last meeting, I would prefer we spend more time working this out in detail. I think there are a lot of areas we could improve on. Several of the comments we have seen here (John , Joel, mine) all seem to indicate that there are some legitimate concerns. Can I live with the standard as it is written now? Probably. But do I think it is the right thing to do? Unfortunately, no.

I would personally prefer seeing us come together again and try to get this right. There is a way we can do this that will be robust and extensible... we just need to agree to it.

Andy Rodriquez

PJM Interconnection, L.L.C.

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

**From:** Simonelli, John

**Sent:** Friday, April 16, 2004 11:51 AM

**To:** 'Dison, Joel'; Carter, Roman; vthomason@naesb.org; weqess@naesb.org; Oncken, Todd

**Cc:** rmcquade@naesb.org; Robert Schwermann; Ed Davis; Andy Rodriguez

**Subject:** RE: Revised CIBP Standard

I have concerns as well because the standard, specifically this section does not necessarily match the diagram.

A PSE wishing to construct the deal must submit the "unbalanced" request to the "Market Assembly" (actually I'm really starting to like the term Interchange Coordinator, please indulge me). The Interchange Coordinator (IC) is responsible for reconciling discrepancies and obtaining necessary approvals from the markets side of the house; GEN, GPE, LSE, MO, TSP, etc. Once the IC has a balanced schedule that all market parties agree too, the IC sends the RFI to the IA. The IA per the NERC standard, contacts the affected reliability entities; RA, BA, TSP to obtain final confirmation of the transaction. If all the lights are green, it goes to the BA for implementation. I am not sure the standard adequately conveys this sequence of events.

Based on this interpretation and recognizing the need to expedite the confirmation process, I have no problems with the submission of the RFI by the IC to the IA going to the affected reliability entities; RA, BA, TSP, but it should not go to ALL involved parties.

John

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

**From:** Dison, Joel

**Sent:** Friday, April 16, 2004 10:39

**To:** Carter, Roman; vthomason@naesb.org; weqess@naesb.org; Oncken, Todd

**Cc:** rmcquade@naesb.org; 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 captures 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*