

Here are my proposed changes for the 638 table and its associated notes. Looking at the table the only service that will be affected by these changes is Daily Firm. While I think these changes will solve most of the problems I'm seeing, with the minimal changes to the table, I don't know if other TP's need additional relief. (Based on Wendy's comments on using redirects to hoard transmission on monthly requests, maybe further modifications should be considered?) Again, my proposal is that the approval/response window moves as the request approaches its begtime. For example, a daily firm request submitted 48 hours in advance will have 24 hours for the customer to confirm it. But a daily firm request submitted 36 hours in advance (i.e. at 12:00 two days before it starts) will only have 14 hours to confirm, because 12 hours later (at 00:00 day ahead) the confirmation period changes to a 2 hour confirmation period. We may need a clarifying statement that time limits will not increase (e.g. a daily firm request accepted 4/1/04 00:01 for 4/3/04 still expires at 4/2/04 00:01. At 4/2/04 00:00 it does not get reset to 2 hour confirmation. As opposed to a DF request accepted 4/1/04 08:00 for 4/3/04, which at 4/2/04 00:00 gets reduced from a 24 hour (4/2/04 08:00) to a 2 hour (4/2/04 02:00) confirmation limit.)

(Changes are: Remove the word Queued in the header of col. 3 in the table. Add clarifying words to notes 1& 2 that the limits can be reduced as the current time approaches the reservation start time.)

**Table 4-2  
Reservation Timing Guidelines**

<b>Class</b>	<b>Service Increment</b>	<b><del>Time QUEUED</del> Prior to Start</b>	<b>Provider Evaluation Time Limit<sup>1</sup></b>	<b>Customer Confirmation Time Limit after ACCEPTED or COUNTEROFFER<sup>2</sup></b>	<b>Provider Counter Time Limit after REBID<sup>3</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	Daily	N/A	30 minutes	2 hours	10 minutes

Notes for Table 4-2:

1. Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED, but may be reduced as the current time approaches the requested begin time.
2. 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, but may be reduced as the current time approaches the requested begin time.

3. Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.
4. Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers should 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.