

Dear Sirs,

On behalf of Southern Company, Transmission and Operations divisions, please accept our comments on the OASIS Phase II Structural Design document.

We offer the following comments:

1) The definition of terms seems to introduce several new terms that are sometimes confusing, or at least somewhat redundant (reference TR Proposal, TR Deal, Transfer Capability, and Transmission Right). There also appears to be some similar confusion introduced in the definition of terms related to scheduling. Wherever possible, the new design should utilize existing terms which have been long been standardized through FERC Orders 888, 889, S&CP Version 1.4, and NERC Operating Policies. Doing so will greatly reduce the amount of confusion created as OASIS Phase II is implemented.

2) The OASIS Node Interactions as shown in the diagram (reference page 10) seem grossly inefficient, and may require each entity to purchase much more powerful hardware systems than is necessary if this architecture can be streamlined. We suggest an alternative solution where each entity is required to designate an "OASIS Authority" which will handle the query and response for certain types of data requests from other OASIS nodes. Using this approach, only the central authority servers would need to handle the larger amounts of data and messaging traffic. Each entity requiring or providing OASIS interaction would be required to specify their OASIS "Authority", a concept that is similar to what we have in the E-Tag world today. We estimate that such an approach would reduce the amount of messaging traffic (over the public Internet, which is not always the most reliable communications path) by 50 percent or greater. A similar alternative has been suggested in the structural design document, where "each region... could choose to fund and maintain a central scheduling database" (reference page 11).

Thanks,
Marc

Marc M. Butts
Southern Company Services