

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
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- Document
- Data Element
- Code Value
- X12 Implementation Guide
- Business Process Documentation

3. RECOMMENDATION

SUMMARY:

This standard addresses the conditions that transmission providers shall institute measures to mitigate problems associated with the submission of excessive or frivolous requests for transmission service on OASIS. The particular cases addressed by this standard are,

- Denial of Service – whether through excessive or inefficient automated queries for information or submission of reservation requests,
- Queue Flooding – submission of excessive reservation requests over and above any reasonable assessment of those requests being accepted, and
- Queus Hoarding – failure to act in a timely manner to accepted requests thereby effectively delaying the ability of willing customers to acquire service.

The OASIS S&CP should reflect changes to the STATUS values, definitions, and process descriptions in accordance with these recommended standards.

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Deleted: <#>may declare OASIS requests RETRACTED or SUPERSEDED due to multiple submission of non-preconfirmed nearly identical transmission service requests [not sure "nearly" makes sense here].¶¶
<#>may limit the number open OASIS connections on a per entity basis.¶¶

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RECOMMENDED STANDARDS:

Definitions:

Identical Service Requests – For the purposes of this standard “identical service requests” are defined by those OASIS transmission service requests that have exactly the same values in 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.”

Like Service Requests – For the purposes of this standard “like service requests” are defined by those OASIS transmission service requests that have exactly the same values in the following OASIS template Data Elements:

- CUSTOMER_CODE
- CUSTOMER_DUNS
- TS_CLASS
- START_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.”

[prs: the concept of like vs. identical requests may or may not be pertinent. I include the definition for discussion and debate whether the standards should address/incorporate “like” but not “identical” requests.]

[prs: The use of “shall/will” versus “may” in the following standards needs to be debated. FERC disallowed MICs standard in part because it was worded in a manner that was discretionary (“may”) on the part of the TP. NAESB standards

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are voluntary, so the presence of “shall” does not preclude any TP from simply not implementing that standard until such time as it is adopted as a mandatory standard by regulation.]

Denial of Service Standard:

OASIS system administrators may institute programs for the detection and mitigation of Denial of Service (DoS) attacks based on the use of recognized standard industry practices. These programs are typically not specific to communication protocols or messaging technologies unique to OASIS, and are typically configured in generic hardware and software employed to connect an OASIS node to the communications network (e.g., routers, firewalls, etc.).

In instances where the OASIS is subject to an unanticipated large increase in the frequency or volume of automated queries, or “grossly inefficient” methods of access by an OASIS user, the OASIS system administrator or Transmission Provider may institute all mitigating remedies in conformance with FERC Order 605. This standard clarifies that the automated 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) will be considered “grossly inefficient” and subject to Order 605 remedies.

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Queue Flooding Standard:

Transmission Providers may institute processes and procedures in OASIS and/or the Provider’s evaluation of transmission service requests to limit the maximum number of **identical service requests** submitted for evaluation by a given Transmission Customer. The Transmission Provider may reject, by setting the service request STATUS to INVALID, any **identical service request** submitted by the Transmission Customer where the sum of the capacity requested in all preceeding, pending (OASIS STATUS of QUEUED, RECEIVED, or STUDY) **identical service requests** equals or exceeds the Total Transfer Capability of the transmission facility(ies) being requested at any point in time over the duration of such requests.

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Queue Hoarding Standard:

Transmission Providers may institute processes and procedures in OASIS and/or the Provider’s evaluation of transmission service requests to limit the ability of a given Transmission Customer to delay the timely processing of transmission requests submitted by other Transmission Customers. This standard shall be instituted in the event of multiple transmission service requests queued for a limited transmission facility(ies), such that the Transmission Provider must wait for the Transmission Customer to act on an accepted request for service (OASIS STATUS of ACCEPTED or COUNTEROFFER) prior to accepting or denying subsequent requests for service. In these instances, if the Transmission Customer explicitly (OASIS STATUS set to WITHDRAWN), or implicitly (OASIS STATUS set to RETRACTED) elects to NOT purchase transmission service within the Customer Confirmation Time Limit established in FERC Order 638, the

Transmission Provider shall reject all **identical service requests** submitted by that Transmission Customer by setting the OASIS STATUS to INVALID. The fact that the Transmission Customer did not purchase the service offered raises the question of whether the Customer has any intent to purchase any of their subsequent requests for that same service is justification for such action on the part of the Transmission Provider.

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Supplemental Reservation Timing Requirements Standard:

To eliminate the possibility for a single transmission service request to block subsequent requests until after the Firm or Non-Firm scheduling deadline, Order 638 Business Practice Standard 4.13 establishing Customer Confirmation Time Limits will be amended as shown below. **[prs: additions shown in bold italics]** Note that the definition of a Customer Confirmation Time Limit is association with a specified "Time QUEUED Prior to Start" does not obligate a Transmission Provider to honor such requests. Each Transmission Provider may establish different minimum lead times prior to start of service as part of their expedited procedures.

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Standard 4.13: The following timing requirements should apply to all reservation requests:

**Table 4-2
Reservation Timing Requirements**

<u>Class</u>	<u>Service Increment</u>	<u>Time QUEUED Prior to Start</u>	<u>Provider Evaluation Time Limit¹</u>	<u>Customer Confirmation Time Limit² after ACCEPTED or COUNTEROFFER³</u>	<u>Provider Counter Time Limit after REBID⁴</u>
<u>Non-Firm</u>	<u>Hourly</u>	<u><1 hour</u>	<u>Best effort</u>	<u>5 minutes</u>	<u>5 minutes</u>
<u>Non-Firm</u>	<u>Hourly</u>	<u>>1 hour</u>	<u>30 minutes</u>	<u>5 minutes</u>	<u>5 minutes</u>
<u>Non-Firm</u>	<u>Hourly</u>	<u>Day ahead</u>	<u>30 minutes</u>	<u>30 minutes</u>	<u>10 minutes</u>
<u>Non-Firm</u>	<u>Daily</u>	<u>N/A</u>	<u>30 minutes</u>	<u>2 hours</u>	<u>10 minutes</u>
<u><i>Non-Firm</i></u>	<u><i>Weekly</i></u>	<u><i>< 48 hours</i></u>	<u><i>4 hours</i></u>	<u><i>8 hours</i></u>	<u><i>4 hours</i></u>

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<u>Non-Firm</u>	<u>Weekly</u>	<u>> 48 hours</u>	<u>4 hours</u>	<u>24 hours</u>	<u>4 hours</u>
<u>Non-Firm</u>	<u>Monthly</u>	<u>< 48 hours</u>	<u>4 hours</u>	<u>8 hours</u>	<u>4 hours</u>
<u>Non-Firm</u>	<u>Monthly</u>	<u>> 48 hours</u>	<u>2 days</u> ⁵	<u>24 hours</u>	<u>4 hours</u>
<u>Firm</u>	<u>Daily</u>	<u>< 24 hours</u>	<u>Best effort</u>	<u>2 hours</u>	<u>30 minutes</u>
<u>Firm</u>	<u>Daily</u>	<u>< 48 hours</u>	<u>30 days</u> ⁶	<u>8 hours</u>	<u>4 hours</u>
<u>Firm</u>	<u>Daily</u>	<u>> 48 hours</u>	<u>30 days</u> ⁶	<u>24 hours</u>	<u>4 hours</u>
<u>Firm</u>	<u>Weekly</u>	<u>< 48 hours</u>	<u>30 days</u> ⁶	<u>8 hours</u>	<u>4 hours</u>
<u>Firm</u>	<u>Weekly</u>	<u>< 72 hours</u>	<u>30 days</u> ⁶	<u>24 hours</u>	<u>4 hours</u>
<u>Firm</u>	<u>Weekly</u>	<u>> 72 hours</u>	<u>30 days</u> ⁶	<u>48 hours</u>	<u>4 hours</u>
<u>Firm</u>	<u>Monthly</u>	<u>< 48 hours</u>	<u>30 days</u> ⁶	<u>8 hours</u>	<u>4 hours</u>
<u>Firm</u>	<u>Monthly</u>	<u>< 72 hours</u>	<u>30 days</u> ⁶	<u>24 hours</u>	<u>4 hours</u>
<u>Firm</u>	<u>Monthly</u>	<u>< 120 hours</u>	<u>30 days</u> ⁶	<u>48 hours</u>	<u>4 hours</u>
<u>Firm</u>	<u>Monthly</u>	<u>> 120 hours</u>	<u>30 days</u> ⁶	<u>4 days</u>	<u>4 hours</u>
<u>Firm</u>	<u>Yearly</u>	<u>60 days</u> ⁷	<u>30 days</u>	<u>15 days</u>	<u>4 hours</u>

Notes for Table 4-2:

¹Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.

²Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override preemption deadlines.

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³Measurement 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.

⁴Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.

⁵Days are defined as calendar days.

⁶Subject 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.



RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:

Requesters:
Request No.:
Request Title:

- 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).

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.

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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:

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RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:

Requesters:
Request No.:
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- 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.

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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 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.

[pr: Here's where everyone's two cents should go on approaches...for example, we considered a time-based limitation of request submittals, etc.]

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Submittal Rate for Identical Requests

All eligible customers are limited to an OASIS submittal rate of one identical request

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the following Data Elements:

CUSTOMER_DUNS
Service_Increment
TS_CLASS
TS_Type
TS_Period
TS_Window
START_TIME
STOP_TIME
POR
POD
CAPACITY_REQUESTED

The Transmission Provider's OASIS will provide the official time stamp for requests Time_Queued and once the request status is RECEIVED, the OASIS shall determine if the maximum submittal rate has been exceeded. For those identical requests that

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exceed the submittal rate, only the first i

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per minute. Identical requests are defined by

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the

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identical request RECEIVED shall be deemed

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the following Data Elements:

CUSTOMER_DUNS(not provided on Templates)

TS_CLASS

START_TIME or STOP_TIME

POR

POD

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Submittal of Non-preconfirmed Nearly Identical Requests

This applies to the submittal of non-pre

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Submittal of Non-preconfirmed Nearly Identical Requests

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confirmed nearly identical requests. It

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Data Elements

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Service_Increment

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TS_Type
TS_Period
TS_Window

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TIME

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requests

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once the request status is RECEIVED, the OASIS

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identical

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addresses the blocking of service by

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multiple nearly identical non-preconfirmed requests and failure to resp

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multiple nearly identical

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ond to COUNTEROFFERS and

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acceptances within the time allowed. Nearly i

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acceptances within the time allowed

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identical requests are defined by

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Data Elements

(not provided on Templates)

ACCEPTED or COUNTEROFFER