

Subj: **RE: Creation of NAESB WEQ Information Technology Subcommittee**
Date: 9/26/2003 3:43:11 PM Central Daylight Time
From: Steven Dayney, Xcel Energy
To: NAESB office

Dear Veronica,

Please accept the following comments of Xcel Energy regarding the WEQ IT activities per your request below. Thank you.

We have reviewed the proposed work items for the WEQ Information Technology Subcommittee and are submitting the following comments.

In general, Xcel Energy feels that it is in the industry's best interest for the WEQ ITS to focus its efforts on moving OASIS forward rather than looking back. The ESC will deliver its work products to NAESB in a few weeks and the WEQ ITS will be able to begin work on OASIS II. There is only a small group of people with the necessary knowledge of OASIS and their available time is limited. Spending this resource on OASIS IA will divert it from OASIS II and further delay this long awaited and badly needed tool. Therefore, we encourage the WEQ ITS to devote the majority of its efforts to the development of OASIS II, and to minimize the time spent on OASIS 1A, if any.

If, however, a decision is made, through the governance process of NAESB to continue working on OASIS IA issues, we have the following comments and requests for prioritization of activities:

Clarification Issues: We feel that the WEQ ITS should respond to requests for simple clarification on an on-going basis.

Specification Change Issues: Making changes to OASIS specifications is a long and costly process. Changes must be approved by the FERC and then implemented on all OASIS nodes. Back-end systems are often impacted as well. We will not support any specification change to OASIS 1A unless the benefits outweigh the costs, both of implementing the changes and of delaying OASIS II. The specification changes suggested for OASIS IA do not appear to meet that criteria, so we do not support them.

Compliance Issues: It is our understanding that NAESB does not address compliance. OASIS compliance is the responsibility of the FERC, not of the WEQ ITS.

Business Practice Issues: The WEQ ITS must always be aware of and concerned with these issues but they cannot decide them. Many business practices are already being discussed in other NAESB committees and in the development of OASIS II. We strongly support ongoing communication between the WEQ ITS, acting as a "how" group, and the appropriate NAESB committee, acting as a "what" group. This will enable the WEQ ITS to successfully implement the business practices that the industry agrees to.