

To: Rae McQuade, chair NAESB WEQ EC
From: Monroe Landrum, chair NAESB WEQ ITS
Subject: OASIS 1A Issues

On the behalf of the ITS, I am forwarding our recommended actions on the OASIS 1A issues that were left over from the OASIS Scheduling Collaborative. Looking at the attachment, you will notice that we have categorized the issues into general issues, compliance/clarification issues, and specification/business practices issues. We have provided comments on each of the issues and recommend that the document be posted on the ITS website with a notice to those subscribed to the ITS.

The general issues are primarily opinions on how we should proceed with OASIS 1A.

The compliance/clarification issues involve concerns about standards not being followed or various implementations of the standard due to varying interpretations of the standards. It is our position that since NAESB is not a compliance monitoring organization and since the FERC has a hotline for presenting such issues, that NAESB take no further actions other than to post our responses on the ITS website.

The specification/business practice issues represent enhancements or new standards that would need to be created. Our comments reflect which items that we feel that the NAESB WEQ EC should take action on and which items that we feel do not warrant further consideration from a cost/benefit perspective. Note that some of the items that we recommended not to move forward on, only apply to OASIS 1A but should be considered in the development of OASIS II. Those are noted in the attachment. Our recommended action items are listed:

- **Redirect of Transmission Service**

Using OASIS to process and record redirects of transmission service is a difficult task. There are many issues related to the redirect and resale functionality, but most are caused by provider business rules or vendor design choices.

The primary issue concerns redirects of transmission service. The current OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold (reassigned) transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as REDIRECTS, that use this resold or reassigned transmission service. This is only an issue when the 2nd customer wants to redirect transmission usage to a constrained path. Currently, unless the provider intervenes on the backend, that provider only has the option to deny this type of transaction when it is tagged. (Specification/Business Practice)

This issue, since it is not addressed in the S&CP, is ripe for standardization. It is suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort in specification in OASIS 1A.

- **Recalls of Transmission Service**

Recall allows a provider to reduce the capacity or duration of a transmission request. The issue with recalls concerns implementation and may be an issue to address at the provider/vendor level. However, clarification is needed.

When a provider recalls a transmission request that is a REDIRECT, should capacity be returned to the impacted request? When a provider recalls any impacting request type, should capacity be returned to the impacted request? If so, should a provider post reductions for the entire “chain” of requests? (Business Practices)

This issue also is not addressed in the S&CP and needs standardization through business practices process. It was suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort.

- **Multiple Submissions of Identical Transmission Requests / Queuing Issues**

OASIS business rules are very similar across most providers. In general, customers submitting transmission request have time periods when they can “queue” their requests. This queue process and the way it relates to the Internet can create issues when customers are “battling” for ATC on constrained interfaces.

Many customers have automated the submission of transmission requests. In order to ensure their place in the queue, these customers schedule these requests to be submitted as a scheduled event. To account for delays caused by the Internet and the nature of web server systems, customers usually submit multiple copies of the same request beginning a few minutes before the top of the hour and lasting until well after the top of the hour.

The issues created by duplicate request submittal are fairly straightforward. Backend systems and the operators working those systems are impacted dramatically. Each request that arrives after the top of the hour is a valid request. Therefore, the provider can have hundreds of requests in the queue that will never be confirmed.

Other issues that are created are related to OASIS performance. Anyone using transstatus to retrieve a list of OASIS requests submitted during a time period similar to the one described above can receive hundreds of bogus requests and only a hand full of legitimate requests. Also, while the systems are busy working on the bogus requests, valid requests can be delayed due to bottlenecks created by this issue. Does there need to be a standard to limit these issues? Will FERC Order 605 address this issue? (Specification/Business Practice)

This issue should be worked on as both a technical and business practice modification. This was discussed at length and the discussion revealed this is a very complex issue that needs to be resolved. (Note that the MIPS attempted to address this issue a couple of years ago, but their recommendations were turned down by FERC).

- **Standardized Process for NITS service on OASIS**

Part(b)

Examples:

Standardized process for NITS service on OASIS:

- a) Initial service application procedure
 - b) Designation of network resources
 - c) Addition of network resources
 - d) Elimination of network resources
- (Business Practice)

The enumerated standardization process was identified as a business process issue that should be referred to the ESS.

- **Naming Standardization**

Standardization for items such as service points is a continuing problem in OASIS and should be addressed. (Specification/Business Practices)

This confusion over multiple names for the same physical point(s) has been a long standing issue. The major issue was identified as follows: at a point of interconnect between two providers, how is the point name established and agreed-upon such that the name is used consistently for both parties. It was agreed that this would be both a technical and business process change for the IT and ESS to address.

It is our suggestion that the EC review these recommendations and assign them to the ITS and/or the ESS for the development of a request for standards for these issues. Our group acknowledges that this is not the normal approach for developing standards requests, however due to the uniqueness of the situation; we wanted the EC to confirm that these issues would be the types of activities that we should be pursuing. While the business practices and S&CP have not yet been adopted by NAESB, we understand that this is currently being addressed. By moving ahead with the development of the standards requests, we would have these in place by the time that the adoption of the BPs and S&CP were complete.

Executive Summary

The following recommendations to address the OASIS issues listed below have been submitted by the WEQ OASIS 1A Issues Task Force for general approval by the WEQ IT Subcommittee. All issues have been documented and sub-divided into three categories (specification/business practices issues, general issues, and compliance/clarification issues). The goal of this task force is to recommend to the IT subcommittee an appropriate categorization of and resolution process for the twenty (20) OASIS Phase 1A issues listed in this document. A quick overview of the task force recommendations are presented first, followed by more detailed discussion under each specific issue. The numbering system was maintained from the original listing to promote continuity in both sections and the original.

OASIS 1A Issues (Quick Overview)

- 1. Additional Standardization in OASIS Phase 1A** (General)
- 2. GUI Issue/Navigation** (General)
- 3. Output Formats** (Specification)
- 4. INFO.HTM** (Compliance)
- 5. Posting of Schedules** (Compliance)
- 6. TLR & Curtailment Posting** (Compliance/Clarification)
- 7. Posting of Advertisements** (Clarification)
- 8. Upgrade Planning & Progression** (General)
- 9. Responsibility Determination** (General)
- 10. Redirect of Transmission Service** (Specification/Business Practice)
- 11. Recalls of Transmission Service** (Business Practices)
- 12. Multiple Submissions of Identical Transmission Requests / Queuing Issues** (Specification/Business Practice)
- 13. Population of System Data** (Compliance)
- 14. Ancillary Service Requests and Purchases** (Compliance)
- 15. ATC Updates** (Business Practice)
- 16. NAESB Implementation of a Compliance Program** (General)
- 17. Announcing / Posting of OASIS Outages** (Specification)
- 18. This issue originally was one item; now broken into three separate items.**
 - 18(a). Standardized Process for NITS service on OASIS (Use of Status Indicators)**
Part(a) (Compliance)
 - 18(b). Standardized Process for NITS service on OASIS**
Part(b) (Specification/Business Practice)
 - 18(c). Standardized Process for NITS service on OASIS (Difference in TP Posting and Capacity)**
Part(c) (Compliance/Clarification)
- 19. Posting Reference Field** (Compliance/Clarification/Specification)
- 20. This issue originally was six items; now condensed down to one item.**
 - 20. Other Items (Naming Standardization)** (Specification/Business Practices)

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Specification/Business Practices Issues

3. Output Formats

Should additional output formats, such as XML, be added to the S&CP? (Specification)

At this time there is not a need for making a massive change in the way output formats are generated. The S&CP standards for OASIS Phase 1A are the accepted way to communicate output formats at this time and does not need changing. Perhaps in OASIS Phase II the potential benefits of XML can be considered. It was suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort.

10. Redirect of Transmission Service

Using OASIS to process and record redirects of transmission service is a difficult task. There are many issues related to the redirect and resale functionality, but most are caused by provider business rules or vendor design choices.

The primary issue concerns redirects of transmission service. The current OASIS standard does not facilitate primary provider approval of redirected transmission when that redirect is using resold (reassigned) transmission service. When transmission rights are resold to another customer, the customer on the original request is the seller on the resale request. In this case, the primary provider responsible for administering ATC no longer has approval rights for any future transactions, such as REDIRECTS, that use this resold or reassigned transmission service. This is only an issue when the 2nd customer wants to redirect transmission usage to a constrained path. Currently, unless the provider intervenes on the backend, that provider only has the option to deny this type of transaction when it is tagged. (Specification/Business Practice)

This issue, since it is not addressed in the S&CP, is ripe for standardization. It was suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort in specification in OASIS 1A.

11. Recalls of Transmission Service

Recall allows a provider to reduce the capacity or duration of a transmission request. The issue with recalls concerns implementation and may be an issue to address at the provider/vendor level. However, clarification is needed.

When a provider recalls a transmission request that is a REDIRECT, should capacity be returned to the impacted request? When a provider recalls any impacting request type,

should capacity be returned to the impacted request? If so, should a provider post reductions for the entire “chain” of requests? (Business Practices)

This issue also is not addressed in the S&CP and needs standardization through business practices process. It was suggested that the IT and ESS work jointly on this issue as both a technical and business practices effort.

12. Multiple Submissions of Identical Transmission Requests / Queuing Issues

OASIS business rules are very similar across most providers. In general, customers submitting transmission request have time periods when they can “queue” their requests. This queue process and the way it relates to the Internet can create issues when customers are “battling” for ATC on constrained interfaces.

Many customers have automated the submission of transmission requests. In order to ensure their place in the queue, these customers schedule these requests to be submitted as a scheduled event. To account for delays caused by the Internet and the nature of web server systems, customers usually submit multiple copies of the same request beginning a few minutes before the top of the hour and lasting until well after the top of the hour.

The issues created by duplicate request submittal are fairly straightforward. Backend systems and the operators working those systems are impacted dramatically. Each request that arrives after the top of the hour is a valid request. Therefore, the provider can have hundreds of requests in the queue that will never be confirmed.

Other issues that are created are related to OASIS performance. Anyone using transstatus to retrieve a list of OASIS requests submitted during a time period similar to the one described above can receive hundreds of bogus requests and only a hand full of legitimate requests. Also, while the systems are busy working on the bogus requests, valid requests can be delayed due to bottlenecks created by this issue. Does there need to be a standard to limit these issues? Will FERC Order 605 address this issue? (Specification/Business Practice)

This issue should be worked on as both a technical and business practice modification. This was discussed at length and the discussion revealed this is a very complex issue that needs to be resolved. (Note that the MIPS attempted to address this issue a couple of years ago, but their recommendations were turned down by FERC).

15. ATC Updates

There is a need to revisit the FERC requirement for ATC adjustments and posting updates. In Order 638, FERC requires adjustments to ATC off-line (internally) when the Transmission Provider accepts reservation requests and then on-line, following confirmation, the ATC posting is to be updated. FERC reasoned that use of this two-step method should reduce the number of accepted requests that will be denied service. This

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methodology tends to encourage delayed acceptance responses from Transmission Providers and has been a trigger for discontent expressed by marketers.

Over the last 3-4 years, there have been significant advances in the automation of backend systems, including calculation of ATC, which interface with OASIS. Revision of ATC postings can be made earlier now and with more certainty than before, so Transmission Providers can avoid the denials of service that once were more frequent due to ATC calculation uncertainties. A pilot project should be designed to test the concerns surrounding denial of service under a one-step method where ATC would only be adjusted upon confirmation. (Business Practice)

While a consensus was not arrived at on this issue it might be noted that the S&CP does not address this issue but Order 889 Part 37.6b and Order 638 does.

17. Announcing / Posting of OASIS Outages

OASIS Outage posting is inconsistent across OASIS nodes. Some nodes send messages to an email list, such as tsin@nerc.com or osc@nerc.com. Other nodes send a message to a list managed by that TSIP.

Section 4.3.10.1 of the S&CP requires providers to post outages “When the OASIS node is out of service and transmission requests are received by the TP by phone or fax.” Using the message template, OASIS users can download this information. All other postings of outages are at the discretion of the provider.

The reality is that many providers leave the posting of node outages to the TSIP. Therefore, the provider has the obligation to make sure that the TSIP is posting outage information on the provider’s behalf.

The message functionality was added to provide a standard for the posting of specific messages, such as node outage information. All OASIS outages can be posted using this standard and customers will have unilateral access to this data using the message template.

Should additional standards be implemented? How can compliance with this requirement be monitored? (Specification)

There was a consensus that this is a technical compliance and specification issue, but no consensus was reached on a method to include in this recommendation to the IT only that a specification for the notification of outages should be written.

18. Standardized Process for NITS service on OASIS Part(b)

Examples:

Standardized process for NITS service on OASIS:

a) Initial service application procedure

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- b) Designation of network resources
- c) Addition of network resources
- d) Elimination of network resources
(Specification/Business Practice)

The enumerated standardization process was identified as a business process issue that should be referred to the ESS.

19. Posting Reference Field

The posting reference is a reference number that must identify the offers being posted on OASIS. The offer posting is in fact a combination of the ATC and the system data, reservations and the price information. When this data is combined to present the offers on the system the posting reference has no real meaning, as it is not clear which of the base items posting identifier is to be used. This worked fine in the past when the system data and the offers were not posted separately. This is a change or a clarification on the purpose of the post ref field. (Compliance/Clarification/Specification)

The S&CP provides guidance on the posting reference field in Section 4.3.7.1 and therefore becomes a compliance issue. There also is a clarification issue in that the S&CP references a posting reference field in Section 4.3.10.1, 4.3.10.2, and 4.3.10.3 and the Data Element Dictionary has a definition for two types of posting reference. The posting reference field needs to be redefine to split the type up into two definitions.

20. Other Items

1) Naming Standardization

Standardization for items such as service points is a continuing problem in OASIS and should be addressed. (Specification/Business Practices)

This confusion over multiple names for the same physical point(s) has been a long standing issue. The major issue was identified as follows: at a point of interconnect between two providers, how is the point name established and agreed-upon such that the name is used consistently for both parties. It was agreed that this would be both a technical and business process change for the IT and ESS to address.

General Issues

1. Additional Standardization in OASIS Phase 1A

Should additional standards be written for OASIS 1A while beginning OASIS Phase II initiatives? (General)

Additional standards should be written and outstanding issues addressed for OASIS Phase 1A. With all the unknowns surrounding OASIS Phase II it makes sense that the

WEQ IT Subcommittee becomes involved in enhancing and maintaining the standards for OASIS Phase 1A while developing OASIS Phase II.

2. GUI Issue/Navigation

Over the years there has been debate over the standardization of the HTML interface to OASIS. HTML “look & feel” requirements were intentionally left out of the S&CP.

The overwhelming majority of the OASIS How Working Group opposed the standardization of the HTML interface to OASIS. The reality is that, with the standardization of the CSV templates across OASIS nodes, vendors have the ability to provide a single interface to all OASIS nodes.

The GUI issue may have deeper roots in customer complaints and “free” OASIS usage. In other words, users of OASIS want a single “look & feel” and they want it at no cost.

If standards were made concerning the HTML interface to OASIS, how would they be policed? What would be the scope of these standards? Would providers have the ability to offer a standard interface as well as an enhanced interface? (General)

At this time standardization of the HTML interface would not be beneficial and therefore not needed. With the existence of the current S&CP standards and with compliance issues resolved, standard template queries and responses should allow any Transmission Customer to perform the same functions across many OASIS nodes in virtually identical fashion.

8. Upgrade Planning & Progression

Should OASIS changes be incremental? Who determines if a modification is mandatory or voluntary or both? If a modification is voluntary, how can compliance be monitored? (General)

Anytime an incremental change in OASIS standards is adopted, the change should include a migration and testing plan as part of that standard. Mr. Burden (Williams Gas Pipeline) noted that the Wholesale Gas Quadrant (WGQ) has an Interpretations Subcommittee to resolve issues of standards interpretation. It was suggested that the WEQ employ a similar approach.

9. Responsibility Determination

Who is responsible for the categorization of issues? For example, given an issue, who determines if it is an implementation issue, a compliance issue, or a technical issue? (General)

There was no consensus proposal for this issue. However, for issues identified as OASIS issues, NAESB should be the governing body in determining an appropriate categorization and resolution.

16. NAESB Implementation of a Compliance Program

Should an OASIS Compliance program be implemented? (General)

It was noted that this issue was discussed during the October IT meeting and was determined that NAESB does not perform a compliance function. Further, it was made clear that compliance was a function to be completed by FERC and that FERC does have a hotline established to handle compliance issues.

Compliance/Clarification Issues

4. INFO.HTM

The posting of information in the INFO.HTM file is inconsistent. The availability of the file across providers is also inconsistent.

Should additional standards be written to clarify the information and design of INFO.HTM? How should non-compliance be monitored? (Compliance)

It is clearly specified in the S&CP (3.4, 4.5) as to which documents should be included.

5. Posting of Schedules

There is a need for compliance on the use of the OASIS template “scheduledetail” for queries and responses associated with schedules and curtailments/interruptions (see OASIS S&CP section 4.3.4.1). This is the template where FERC requires information specific to an individual schedule. There is a tendency to use the tag for this information; however, the OASIS data is currently the required source for audit information associated with schedules and curtailments/interruptions. (Compliance)

There is a compliance issue with some Transmission Providers (TPs) not posting this information in the required format as defined by S&CP (4.3.4.1).

6. TLR & Curtailment Posting

There is a need for compliance on use of the OASIS template “security” for queries and responses associated with security events such as curtailments or TLR's (see OASIS S&CP section 4.3.4.2). This is the template where FERC requires information specific to the event, such as facilities involved, start time of the event, etc. Currently, the NERC website provides a central repository for such information associated with the Eastern Interconnection. There is a need to add Western Interconnection information to this repository. (Compliance/Clarification)

There is a compliance issue with S&CP (4.3.4.2) in the way that some TPs post the required events. There is also a compliance issue with some TPs not posting this information in the required format. There also is a clarification or interpretation issue in regards to which events should be posted.

7. Posting of Advertisements

Should the posting of related and/or unrelated advertisements be allowed on OASIS nodes? (Clarification)

S&CP (4.3.10.1, 4.3.10.2) is somewhat vague in this area. A clarification is needed on this issue to more clearly define what types of messages are permissible. Note that this issue is complicated by the fact that many OASIS sites are hosted by external companies and a “hosted by” reference could be viewed as an advertisement.

13. Population of System Data

There is a need for compliance with the S&CP on use of the OASIS template “systemdata” for queries and responses associated with ATC/TTC, etc. (see OASIS S&CP section 4.3.4.4).

This is the template that must be populated in order to meet FERC requirements associated with uploads and downloads of ATC/TTC data. Prior to publication of the S&CP version 1.4, the S&CP required provision of ATC/TTC data through use of the “transoffering” template.

When FERC required CBM data on OASIS, uploads and downloads of CBM were combined with all other system attribute data through the use of “systemdata”. At the same time, use of “transoffering” for ATC/TTC data became optional. (Compliance)

S&CP (4.3.4.4) already specifies the use of “systemdata”; thus it appears that some TPs may not be in full compliance with the “systemdata” template.

14. Ancillary Service Requests and Purchases

There is a need for compliance on use of the several ancillary services templates in OASIS for queries and responses associated with the sale and purchase of ancillary services. FERC requires this under Order 889, and as revised. This priority may be lower due to the complexities involved and chaos in the industry associated with ancillary services, in addition to the somewhat rigid methodology provided for in the current OASIS S&CP. This will also be a requirement under OASIS II. (Compliance)

Compliance issue, the S&CP (4.3.2.2, 4.3.3.2, 4.3.8, and 4.3.9) already specifies how to handle this type of service. Further enhancements may be required in the development of OASIS Phase II.

18. Standardized Process for NITS service on OASIS (Use of Status Indicators)

Part(a)

Overall problem of misusing the different status indicators, e.g. setting a request to REFUSED because the request was incomplete. There is a need for a uniform interpretation of the S&CP. Specifically, making sure that similar conventions and data definitions are employed on all nodes. (Compliance)

This issue is a compliance issue with S&CP (4.2.10.2) dealing with the misuse of the status indicators.

18. Standardized Process for NITS service on OASIS (Difference in TP Posting and Capacity)

Part(c)

Some providers post things in “blocks” (i.e., an on-peak block), while others post everything in hourly increments (i.e., 24 discrete values). Another might be that some providers respond to a TRANSSTATUS by using CAPACITY REQUESTED and STATUS to allow a customer to derive CAPACITY_GRANTED, while other providers specifically indicate CAPACITY_GRANTED (and some only use CAPACITY_GRANTED if it differs from CAPACITY_REQUESTED).

There are different implementations all have their own unique flavor that have to be coded around. “If PROVIDER =” type statements must be written in order to catch all the node specific implementation details. Obviously you can write exception rules to deal with it, but you shouldn't have to.

If we did some standard queries against all the nodes and compared the data, we'd probably find some interesting differences. If there are valid reasons for the differences, then they should be codified in the S&CP or in Order 638. If not, they should be clarified to ensure uniform interpretation and the nodes modified to meet the clarified S&CP.

The standardization issue above is probably a good idea but it might be a little late unless we see the existence of OASIS according to the S&CP 1.4 continuing more than a couple of more years.

The key question is, is it a matter of S&CP 1.4 implementation (i.e., template access) or is it a really a matter of a TP's tariff (i.e., data content). It would not seem you could affect change to the latter (e.g., your reference to “block” vs. hourly), only the first (e.g., element name usage discrepancies).

Many solutions and associated support systems have been built around the different interpretations and implementations as they are today. Some companies may not be inclined to incur the cost to make significant changes, unless a clarified standard is issued.

A submission to FERC would be required since they are the ones responsible for enforcement of the OASIS S&CP. A validation suite should be developed.
(Compliance/Clarification)

This issue was identified as a technical clarification issue that needed to be clarified and provided by the WEQ IT Subcommittee.

19. Posting Reference Field

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The posting reference is a reference number that must identify the offers being posted on OASIS. The offer posting is in fact a combination of the ATC and the system data, reservations and the price information. When this data is combined to present the offers on the system the posting reference has no real meaning, as it is not clear which of the base items posting identifier is to be used. This worked fine in the past when the system data and the offers were not posted separately. This is a change or a clarification on the purpose of the post ref field. (Compliance/Clarification/Specification)

The S&CP provides guidance on the posting reference field in Section 4.3.7.1 and therefore becomes a compliance issue. There also is a clarification issue in that the S&CP references a posting reference field in Section 4.3.10.1, 4.3.10.2, and 4.3.10.3 and the Data Element Dictionary has a definition for two types of posting reference. There is also a need for a specification change to identified both and split the definition into parts.