

General overall comment:

Many of the issues raises here tread on the compliance side of the fence rather than the OASIS functionality side. While some enhancements to OASIS may in fact eliminate or dramatically improve compliance, they will not “fix” all the issues. What the industry needs to decide is should it create a self-policing sub group within the OSC to hear complaints and make recommendations based on their knowledge of OASIS and tariffs. The non-compliant organization would be given a change to “mend their ways” and if they opted not to then the complaint and accompanying recommendation would be forwarded to FERC for final resolution. Compliance needs some teeth.

Attachment A OASIS IA Issues

This document has been created by the OSC to provide the industry with a description of issues related to the current implementation of OASIS. Many of these issues are documented in the form of a question that should be answered by the appropriate group(s). The OSC has categorized the issues (See []). The issues are in no particular order.

1. Additional Standardization in OASIS Phase 1A

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

Yes – With all of the unknowns surrounding Phase II, most importantly when and if it’s implemented, it makes sense to develop and maintain Standards for Phase 1A.

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

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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]

We do not see the need for an HTML interface standard; the standardization of the CSV templates under the covers assures the identical data is sent the same way. Allowing GUI flexibility was done to facilitate creative and efficient GUI development.

3. Output Formats

Should additional output formats, such as XML, be added to the S&CP?
[Technical,
Specification Change]

We recognize the importance of XML as an emerging industry standard, but do not wish to incur an expense and effort for something none of our customers have requested. We think the XML requirement should be deferred to Phase II unless there is a clear and immediate industry need.

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? [Clarification]

This is mostly a compliance issue. The current standard is clear as to which documents should be posted. The required documents should be able to be found on the Provider's Homepage as General Information or in INFO.htm. The issue here is whether providers are posting the information at all, not whether it is in General Info or INTO.htm. Allowing the required information to be on the Homepage allows quicker access to the documents and makes it easier to find.

This question seems to imply that standardization of INFO.htm would facilitate an external audit of compliance. However, compliance could follow the form of

EIA or FERC reporting whereby an officer of a provider's company would be required to sign a compliance statement and to complete a standardized, detailed checklist of required items. These documents could then be submitted annually to the compliance authority.

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]

Schedules and subsequent curtailments need to be posted on OASIS, this is a FERC compliance issue and there really isn't anything in the S&CP for OASIS 1A that will “fix” this.

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]

Generally no comment, however we would agree with the apparent need but this once again treads on FERC compliance not OASIS 1A issues..

7. Posting of Advertisements

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

No- this would seem an inappropriate use of the OASIS System. The ‘advertisement’ of discounted transmission/ancillary services is allowed under the current OASIS functionality and advertisement of any other “product” should not be allowed.

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]

If a change is determined to be included in the S&CP, that change should be mandatory. Means to monitor voluntary changes is not feasible. We assume that changes to the S&CP would result in revision, such as OASIS Phase IB. We recommend that all upgrades to the OASIS software to support the Phase IB changes be implemented at the same time. Unless a certain requirement would result in an untimely rollout, we feel an incremental approach to changes is not appropriate.

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]

This should be an industry group where issues are reviewed and prioritized by consensus.

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 Change, Business Practice]

The concept of Redirects is to change the configuration of the service, changing its POR/POD, this type of change needs go back to the Original Provider for approval/denial. They must have control over the service they sell. Both the business practices and OASIS functionality must be configured to allow the original Provider to see these redirects as they occur on OASIS well before the scheduling window employed on E-tagging.

11. Recalls of Transmission Service

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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]

Although this is not a issue in New England where advance reservations are not required, from an administrative point of view, it would seem that it could be very difficult to manage a REDIRECT and be able to implement a process where the original service is restored. A Transmission Customer makes a decision to REDIRECT Transmission Service; this is a decision that should not be made without consequences. To allow, “flip/ flopping” of service defeats the need to thoroughly think through the REDIRECT if the original service will be restored if the secondary service is recalled.

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 this 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

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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? [Business Practice]

The issues associated with queueing of requests are no longer an issue at ISO-NE due to the implementation of SMD. However, prior to SMD, ISO-NE had implemented a business process to avoid this queueing issue. In this business process, all requests that were received within a defined time period after the deadline were all granted the same timestamp (allocation process). This eliminated the need for parties to fight for the earliest submittal timestamp. This issue may be solved via business process rules such as allocations, auctions, etc. as opposed to a hard code change in the S&CP.

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. [Clarification, Compliance]

Clarification is needed on this issue; many providers have interpreted an ATC/TTC posting via "transoffering" to be sufficient. Is this a compliance issue or a loophole in the S&CP ?

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]

Understood that this is a compliance issue, however many areas offer ancillary services through Market mechanisms and not through Transmission Services. As implied, this is a situation that's not going to change anytime soon and different areas will do what they must to make it work. What options do we have?

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 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 onestep method where ATC would only be adjusted upon confirmation. [Business Practice]

Generally no comment, however we would agree with the apparent need.

16. NAESB Implementation of a Compliance Program

Should an OASIS Compliance program be implemented? [Compliance]

No Comment

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.

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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 Change]

Section 4.3.10.1 of the S&CP requirements regarding posting of outages is sufficient. Compliance with this requirement is adequate for planned/known outages if universally enforced. There should however be a backup plan for unforeseen OASIS outages. If OASIS is unavailable, how will customers find out what is happening ?

18. Standardized Process for NITS service on OASIS

Overall problem of misuse 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]

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 – Specification Change]

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

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catch all the nodespecific 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. [Compliance, Business Practices]

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. I don't know if companies would be inclined to incur the cost to make significant changes.

In addition, I believe a submission to FERC would be required since they are the ones in control of the specification and I believe any clarification should become part of the specification. A validation suite should be developed. [Compliance, Business Practice]

The nature of some of the unique nuances of NITS between Providers can be traced to language in their tariff. This therefore affects how they offer, post and approve such services. A lot of industry confusion can be eliminated if FERC would enforce the use of standard tariff language. FERC has indicated a shift in this direction with both Order 2000 and the SMD NOPR. While OASIS may use some expanded functionality to help the situation, it may not completely resolve all the problems. Is it worth investing time/money to partially fix now or wait until OASIS II and subsequent FERC orders come out ?

19. Post Reference Field

The post 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 post reference has no real meaning, as it is not clear which of the base items posting identifier is to be used. This worked

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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.
[Specification Change]

No Comment

20. Other Items

For the most part these appear to be variations of questions already asked.

1) System Data

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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.

Same question as #13 (Population of System Data), see answer above.

2) Schedule Details

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.

Same question as #5 (Posting of Schedules), see answer above.

3) Security Events

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

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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.

Same question as #6 (TLR & Curtailment Posting), see answer above.

4) Ancillary Services

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 Phase II.

Same question as #14 above (Ancillary Service Requests and Purchases), see answer above.

5) 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 2-step method should reduce the number of accepted requests that will be denied service. This 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 onestep method where ATC would only be adjusted upon confirmation.

Same question as #15 (ATC Updates), see answer above.

6) Naming Standardization

Standardization for items such as service points is a continuing problem in OASIS and should be addressed.

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Agreed but recognize the industry has been asking for this as well as standardization of TTC/ATC postings across common but jointly owned interfaces since OASIS went live and we are still asking for the same thing.