

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.

The statement above "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" is incorrect. The primary provider must track assignment numbers, scheduling rights, and manage ATC.

Follow the money. Resale of transmission service does not relieve the primary customer of the financial obligation to the primary provider. As such, the primary customer must make the request for transmission service redirect to the primary provider on behalf of the secondary customer.

Reassignment of transmission service transfers the financial obligation with the primary provider from the primary customer to the secondary customer. At that point, the secondary customer must work with the primary provider for redirects.

All redirect requests must be placed in the appropriate queue and appropriate priority.

OATI/PRS: MIC and the ESC both agreed with definition of two types of secondary market transactions as stated above: 1) resale for transfer of scheduling rights only and 2) reassignment for complete transfer of financial and all other Ts&Cs under the tariff. Agree with the above statements that business practice standards should be drafted in support of these two types of secondary market transactions. And, explicitly limit the rights under "resale" to transfer of scheduling rights only, Redirection would require full reassignment under the tariff with secondary market customer then being required to deal directly with the TP.

Another issue that should be discussed in the context of “resale” is what scheduling rights are conveyed to the third party? Some TPs interpreted “resale” to allow the TC to resell the capacity as any valid product of equal or lower priority. One might argue however, that if the third party purchases one hour from a TC on a monthly non-firm reservation, why wouldn’t that third party have monthly non-firm priority with respect to scheduling. If the original TC retained the reservation they would have such priority in event of a TLR. So, the practice might be that the “resale” reservations should carry the same transmission service/priority of the original (or lowest of the group if TC aggregated capacity from many reservations?), but not be bound by any of the service increment requirements/restrictions.

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.

Service redirected on a firm basis decrements firm rights on the parent reservation. Recalls/curtailments on the child reservation path do not entitle the rights holder to firm capacity on the parent path without going through the redirect process. The rights holder may request redirect back to the parent path (or any other path of that provider) on a firm or non-firm basis. Of course their position and priority in the queue for this second (or third, etc.) redirect is treated or positioned as any new request coming in.

Service redirected on a non-firm basis does not decrement firm rights on the parent reservation (although total scheduling limits are capped at the parent reservation rights). A recall on the child path will not prevent the exercise of full firm scheduling rights on the parent path or prevent the request for a redirect on to another path.

OATI/PRS: Agree.

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).

Order 605 did address in a general sense the users' impact to OASIS, but not this specific item (multiple requests). FERC did ask the How Working Group and NERC's MIC for input (we should find their respective responses) and review what the MIPS did.

My read of 605 is providers need properly sized OASIS's and customer need to give fair warning of expected heavy use. The Order does not address a provider's human resource limitations in processing large volumes of requests.

OATI/PRS: Believe there is some confusion based on above response. The issue was addressed by the MIC and a proposal filed with FERC that was ultimately denied. The problem could be termed “queue hoarding”. Because of the 638 customer confirmation time limits, if a TP processes reservations in strict first-in-first-out priority, a TC could conceivably submit multiple like reservations in close succession. When there is limited availability, the TP would accept the first queued reservation, but not proceed with acceptances of other queued requests until the TC confirmation time limit expired. At that time the acceptance is retracted (or withdrawn by the TC) and accept the next reservation in line, which is from the

same TC. The TC has tied up the little remaining capacity with apparently little intention of confirming a reservation. Several solutions have been suggested; accept all and first to confirm wins, etc. ESS should review the MIC filing that was denied. If not in the MIC filing, suggest that TPs have the right to “purge” their reservation queue of all reservations from the same TC, on the same Path, with the same start time, if that TC fails to exercise the TPs acceptance of the earliest queued request (either TC withdraws or confirmation time limit expires).

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.

We should act as a "what" group on this issue. The list of what items shown above should be supported in the S&CP for network service and native load. I would add to the list above, the required request submittal for ATC to accommodate secondary network resources (an OASIS submittal for transmission services to support spot and short-term network purchase/resources).

OATI/PRS: Agree that use of non-designated resources on a secondary basis should be supported by a standard business practice and standard mechanism on OASIS to make such arrangements. These standards could be based on submission of scheduling information. Many TPs allow use of non-firm secondary via tags with no OASIS reservation. Due to the priority NITS use of non-designated resources might be more restrictive. Will need timing rules; max duration and lead times for such requests; whether these are a special form of REDIRECT; etc.

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.

FERC started to address naming in Order 638, section 6. Anything developed here would most likely be added to section 6. Perhaps a standard such as we use in the western interconnection - the facility operator determines name (in many cases that is the host control area) and all TPs sharing that point must adopt the name. The standard could also require each NERC region make sure point naming is cleared-up (it could be argued this is also a reliability issue due to potential confusion on facility naming)

OATI/PRS: Agree that the western naming convention greatly facilitated the determination of “adjacencies” between various TPs and allowed for identification of contract paths between entities. This should be promoted throughout all interconnections and supported by the TSIN (aka NERC) Registry.