

Subj: **APS Concern on Today's Vote**
Date: 11/6/2003 10:59:17 AM Central Standard Time
From: [Gary Duede - APS](#)
To: NAESB Office

Rae,

I am out of the office but hopeful that I will be able to participate in today's conference call. However, in the event I cannot join, I wanted to express a concern that I have about today's vote. While I understand that it is our normal course of action to publish what we ratify to allow FERC to have the entire package at its disposal, I am concerned that the timing of today's vote, the pendency of FERC action and the out of the ordinary procedures that surrounded the submission and resulting creditworthiness comments to FERC calls into question the logic of this policy. Specifically, I am concerned about publishing Creditworthiness Standards if FERC hasn't issued an Order (or NOPR for that matter) addressing these standards. For example, if FERC responds to industry comments by accepting some and rejecting other standards, what we vote on today would not be a regulation yet we would have approved it as a NAESB WGQ Standard and it would be already published as such. I believe this might be confusing for companies to have to go back and manually strike language from our publications so that those who implement standards are acting consistent with FERC' regs. I therefore believe that to maintain the integrity of our publication, the work of technical relating to the pending creditworthiness standards should be held until such time as FERC takes action on these standards.

Kelly A. Daly