

IRC COMMENTS

WGQ/WEQ eTariff Work Paper of draft proposed business practice standards

Disclaimer: The purpose of these comments and questions is to facilitate discussion regarding electronic tariff filing issues and the proposed development of business practice standards. The comments expressed in this document do not necessarily reflect the opinions of all IRC members.

Note: The AESO is a non-FERC jurisdictional entity and is not a party to these comments.

x.1 Transmission Service Provider (“TSP”) shall mean company regulated by the Federal Energy Regulatory Commission (“FERC”) required to submit Tariff Filings pursuant to Parts 35, 154, 284, 341 or other Parts as required by FERC.

x.1alternative

Transmission Provider (“TP”) shall mean (1) any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce pursuant to Part 35; (2) any interstate natural gas pipeline that transports gas for others pursuant to Part 157 or 284, (3) any intrastate pipeline, local distribution company or Hinshaw pipeline that transports gas for other pursuant to Part 284, or (4) any oil pipeline that transport oil or natural gas liquids for other pursuant to Part 341.

Comment: Shouldn't the new standards simply apply to any entity required to submit tariffs to FERC, as already defined – see, e.g., footnote 2 of Order 614? Why create new definitions and confusion if it is not necessary? This does seem to be a part of the wheel that needs reinventing.

x.2 Data Base shall mean compilation of all tariffs, Tariffs, OATTS, Rate Schedules, certain service agreements, Statement of Conditions, rates and any other material the FERC requires to be filed in a data base format.

Comment: Docket No. RM01-5-000 was initiated by FERC to develop software and a process for electronic filing of **tariffs**. The proposed definition of data base includes a much broader collection of documents all with different formatting and textual constraints. The IRC is concerned that such a definitional expansion goes far beyond the intent of the rulemaking and will result, among other things, in significantly higher implementation costs and filing complexities.

Has FERC identified “any other material” required to be filed in a data base format?

x.3 Each TSP or TP shall have no more than one active Data Base.

Comment: Would each document listed in x.2 be considered a record or data base? Please define “active”?

How will terminated Service Agreements be treated (i.e., active or inactive)?

x.4 A Field shall have defined formats and restricted values.

Comment: Will ALL fields have restricted values?

x.5 A Field may be mandatory or discretionary.

x.6 A Field is an element of a Record.

x.7 A single Record of a Data Base will consist of multiple Fields.

Comment: Should that be “one or more Fields”?

x.8 A Record may contain a Field that is either plain text or a document (e.g. PDF File).

x.9 A Data Base shall have at least one Record.

x.10 A Tariff Filing should consist of a TSP/TP filing made pursuant to Parts 35, 154, 284, 341 or other Parts as required by the FERC.

Comment: The electronic filing system also must be able to accommodate multi-party joint filings.

x.11 A Tariff Filing should include all components, as applicable:

- a. Transmittal Letter
- b. Notice
- c. supporting documents
- d. required Records of tariffs
- e. Tariffs
- f. OATTS
- g. Rates Schedules
- h. service agreements
- i. Statement of Conditions
- j. rates
- k. any other material the FERC requires to be filed in a Data Base format.

Comment: Are 10 and 11 beyond the scope of the project? Moving tariffs to an electronic format does not change current practices and procedures regarding what a tariff filing consists of.

Will each item (a-k) listed above need to be filed using the other proposed standards for each filed tariff revision?

How does item “d” differ from items “e” and “f”?

With regard to item “k”, please identify “any other material” FERC requires to be filed in a Data Base format.”

x.12 Type of Filing shall mean the specific FERC defined Tariff Filing that may be filed by a TSP/TP pursuant to Parts 35, 154, 284, 341 or other Parts asrequired by the FERC.

x.13 TSPs/TPs will have two options to make Tariff Filings, either (1) Entire Document Option or (2) Sheet Option.

x.14 Entire Document Option means that TSP/TP submits its Tariff Filing as a single Data Base Record (e.g. one of the Record Fields includes a PDF File.)

x.15 When a TSP/TP selects the Entire Document Option, for all future revisions, the TSP/TP shall file the entire Tariff Filing as a single Data Base Record that includes all revisions.

Comment: Please define the term “revisions”. Does this include all outstanding tariff filings and compliance filings not yet accepted by FERC?

How will FERC treat revisions put into effect by a utility prior to FERC approval?

x.16 Sheet Option means that TSP/TP submits each sheet as individual Data Base Record (e.g. one of the Record Fields includes a sheet as a PDF File.)

Comment: Will each sheet have to have a discrete length (i.e., no carry over words/phrases from one sheet to the next)?

If a sheet based approach is adopted, will the existing alpha-numeric sheet designation and sheet revision structure be retained?

If, a “sheet” can be as long as necessary, and parties are given ample flexibility to choose the granularity of information on each sheet, then the system can constitute a real improvement over the current practices. Note that in this latter case, whether the system is called “sheet based” or “section based” is a matter of labeling rather than substance.

How will retroactive sheet designations be handled?

How will the provisions of Order No. 614 be addressed in a whole tariff, section or sheet-based approach to electronic filings?

x.15 When a TSP/TP selects the Sheet Option, for all future revisions, the TSP/TP shall only file the sheet(s) that contain revisions.

Comment: Will the shifting forward of unaltered tariff text from one sheet to a subsequent sheet be considered a revision? Note that if each “sheet” can be as long as necessary, this need not be an issue.

Could a tariff be divided into discrete sections for purposes of electronic filing instead of sheets or whole tariffs? Again, this could just be a matter of labeling, if sheets can be as long as necessary and parties have ample flexibility to choose the level of granularity.

x.16 When .pdf formats are use for content in Record Fields, such pdf formats shall include the following functionality:

- a. word search
- b. headers to activate Adobe automatic Table of Contents generator
- c.

Comment: Is this necessary? In current practice, tables of contents are themselves filed sheets. Suggest removing bullet c. Any additional functionality can be added as identified.

x.17 A Tariff Filing shall include the following information for each Record Field submitted by a TSP/TP:

- a. TSP/TP identifier
- b. Data Base identifier
- c. Data Base title
- d. Filing identifier
- e. Filing title

- f. Type of Filing
- g. TSP/TP Contact Name (First, Middle and Last)
- h. TSP/TP Contact email address
- i. TSP/TP Authorizing Person Name (First, Middle and Last)
- j. TSP/TP Authorizing Person email address
- k. Associated Filings, if any. Associated filings are used to identify prior filings related to this filing (e.g., compliance filings and withdrawal filings shall identify the previous, applicable filing that they impact.)

Comment: Suggest adding the following information to the list above: Create Date and Time.

Please define the term "Record Field".

Please identify if and where the use of FERC's existing docket number system will be utilized in an electronic tariff filing.

How will not yet approved unrelated tariff language from a different docket(s) be identified on a sheet, section or entire tariff?

This draft seems to omit one of the most important elements of an electronic tariff system – a system for tracking historical and pending tariff revisions. To a greater extent than many other entities, ISOs / RTOs have extremely large tariffs that are the subject of frequent, often overlapping, revisions. The electronic system must have an intuitive system for tracking these many revisions. At a glance, the user should be able to: 1) see that the text being reviewed is indeed the currently-effective tariff language; 2) pull up the full text of each previous version of that sheet, section, or document and see how the section has changed over time; and 3) pull up the full text of any proposed changes to that sheet, section, or document that have been filed and are pending before the Commission. This was an important component of the FERC-developed software that must be retained. Will historical tracking be available on a going forward basis?

- x.17 An Entire Document or Sheet that is part of a Tariff Filing shall include the following information:
 - a. TSP/TP identifier
 - b. Filing identifier
 - c. Option Description
 - d. Data Base identifier
 - e. Record identifier
 - f. Record title
 - g. Record number
 - h. Record collation value
 - i. Record Parent or Container identifier
 - j. Record effective date
 - k. Record effective priority order
 - l. Record raw data
 - m. Record plain text
 - n. Record type change request
 - o. Associate Filing

Comment: Has anyone estimated the cost and time to file tariff sheets using the "a - o" criteria listed above?

Regardless of whether an entire tariff, sheet or section-based approach is utilized, has anyone considered the practical and IT implications for ISOs/RTOs to post such filings on their web sites and to communicate these revisions to market participants without the use of redlining or the potential for errors to occur between what is filed at FERC and what is posted on a website? The draft text/sheet spreadsheet example produced by FERC staff does not utilize redlining.

FERC defines item “k Record effective priority order” in the following manner:
When multiple changes to the same content are proposed to go into effect on the same day, this value will determine which change will take precedence. (i.e., the change filed with the highest priority value will be the one that becomes effective on the given date).

Is this a subjective qualitative ranking or is it based on the filing letter description? Who assigns this value?

Where exactly will all of this “metadata” live? Currently, this information (what is required today) is provided in the header and footer of each paper sheet. In the electronic system, will this information be a part of the each sheet or Record, or is a more useful way of keeping and organizing this information contemplated? The answer to this question should also address the redundancy of information contemplated in the two section 17s above and section 18 below.

Include the following information to the list above: Document fingerprint (a hash of the document that is used to validate its contents)

- x.18 All supporting documents submitted with a Tariff Filing shall include the following information:
- a. TSP/TP identifier
 - b. Filing identifier
 - c. Attachment Reference Code
 - d. Waiver requested
 - e. Supporting document
 - f. Supporting document filename
 - g. Document Security Level
 - h. Associated Record identifier
 - i. Associated Option designation

Comment: Additional concerns include:

- Data Exchange/Delivery mechanism
- Ensuring confidentiality of the information
- Access control and authentication

General issues

How will the submission of confidential material be processed electronically?

FERC’s Text/Sheet Example of new Sec. 4 Filing and follow-up Compliance filing
This document lists 18 distinct Filing data elements, 7 Filing Attachment data elements and 18 Tariff Content data elements.

Comment: Please explain if these criteria will be required for **each sheet** of a sheet-based electronic filing.

Who will be responsible for entering this data?

How long after a filing is submitted will it take to verify the accuracy of all the element names as well as the other filing components?

Will “filing” submission errors be identified for ease of correction by applicant?