

INFORMAL COMMENTS

Quadrant: Wholesale Electric Quadrant

Document: Specification for Implementation of Conditional Firm in e-Tagging

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The Midwest ISO requests that as the NAESB working groups, task forces, subcommittees, and committees move forward in modifying requirements and standards for conditional firm point-to-point service to support FERC Order 890 they consider that all entities are not required to implement conditional firm point-to-point service. FERC Order 890, paragraph 992 states “the Commission finds that it would be inappropriate to require RTOs and ISOs with real-time energy markets to adopt the provisions for conditional firm point-to-point service.”

Therefore, we are requesting when these NAESB groups make changes to existing requirements, standards, and documents that they do not develop recommendations, which would require all entities to make system changes to support conditional firm point-to-point service. Additionally, we would like to have this exception documented in the appropriate NAESB Business Practices/Standards similarly to the way exceptions/variations are documented for others, such as the WECC exemptions under recommendation R06026.