



North American Energy Standards Board

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NAESB Wholesale Electric Quadrant Executive Committee Notational Ballot

Due July 30, 2008 to NAESB Office

Fax Number 713-356-0067, email naesb@naesb.org or response to email request

Please vote in favor of, in opposition or as an abstention for the following recommended standards action:

| Support | Oppose | Abstain | Action: |
|---------|--------|----------|---|
| | | X | 2008 AP 2.a.i.2 and 2008 AP 2.a.vii.1 – Conditional Firm Business Practice Standards associated with S&CP Requirements completed in 2008 AP 2(a)(i)(1) and Tagging for Conditional Firm Service. Additional Changes to Rollover templates (redline version) (clean version) (super majority vote required for passage). |

Member Name: Daryl C. McGee

Member Signature: 

Member Company: Southern Company

Segment: Transmission - IOU

Date: August 15, 2008

Comments:

Southern Company actively participated in the drafting of this business practice and supports the recommendations made by the working group related to the communication protocols. However, the standard as written is overly prescriptive and goes well beyond what is required of NAESB from Orders 890 and 890-A.

As a Transmission Provider, Southern Company cannot fully support this standard as written since it contradicts (in our opinion) certain sections of Order 890 and the Pro-Forma Tariff. Additionally, by the standard being over-reaching we feel that the regional variation for implementing the Conditional Firm Service allowed by FERC in Order 890 (P1046) is taken away by this standard. Both issues were raised in the WEQ-EC meeting held on July 31, 2008 but neither motion carried. It could be interpreted that an "industry consensus" was reached on these issues, but we disagree. Simply because a smaller subset of the WEQ-EC decided not to carry the motion to modify the standard, it should not be interpreted that there is consensus of the entire industry. Southern Company will continue to raise these issues as this process continues.

Since we are generally in support of the standard for the areas directly remanded to NAESB from FERC, we do not vote in opposition, but rather abstain from voting.