North American Energy Standards Board
1301 Fannin, Suite 2350, Houston, Texas 77002
Phone: (713) 356-0060, Fax: (713) 356-0067, E-mail: naesb@naesb.org
Home Page: www.naesb.org

August 12, 2008

TO: NAESB Wholesale Electric Quadrant Executive Committee Members, Alternates and Interested Industry Participants

FROM: Rae McQuade, NAESB President

RE: WEQ Executive Committee Meeting Announcement and Draft Agenda with links to Meeting Materials

NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
Hosted by El Paso Western Pipeline, Colorado Springs, CO
August 19, 2008

As announced at prior Executive Committee meetings, meeting announcements and in other communications, the Executive Committee (EC) will meet in Colorado Springs on August 19, 2008. Below are the meeting arrangements:

WHERE:	Hosted by El Paso Western Pipeline Offices: 2 North Nevada Avenue, Colorado Springs, CO
CONTACT:	Veronica Thomason, 713-356-0060 (main number)
WHEN:	Tuesday, August 19 -- 10:00 a.m. to 4:00 p.m. MT
CONFERENCE CALLING:	866-740-1260, Access Code 3560060, Security Code: 1301.
WEB CASTING:	If you would like to participate in the web conference, go to www.readytalk.com and enter the same access code (3560060) and security code (1301).

If you plan to attend the EC meeting by conference call/web cast or in person, please RSVP to the NAESB office (naesb@naesb.org) as soon as possible. Hotel information is posted on the NAESB web site at http://www.naesb.org/pdf3/ec081908hotels.doc. The meeting is open to any interested party.

The materials for the meeting are contained in links in the agenda. As more information becomes available, more links will be added and the revised agenda will be forwarded to you. All voting items requiring a super majority vote or that amend standards or standards work products are contained in this agenda. The agenda with links is posted on the web site for public access. As a change in procedures, please note that in a cost saving measure to reduce paper usage and shipping fees, we will not be printing this material for those attending in person. We will however have agenda available at the meeting.

As always, the chair reserves the right to extend the time of the meeting to ensure that agenda items are addressed. The times indicated on the agenda will be followed to ensure that agenda items are allotted appropriate time slots. Should an agenda item conclude earlier than its stated time slot, the remaining time could be allotted to other agenda items at the discretion of the chair.

Please feel free to call the NAESB office should you have any questions or comments.

Best Regards,
Rae

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NORTH AMERICAN ENERGY STANDARDS BOARD
2008 EXECUTIVE COMMITTEE TERMS – Wholesale Electric Quadrant

TRANSMISSION SEGMENT		TERM END:	SUBSEGMENT:
Patrick McGovern	Manager - System Services, Georgia Transmission Corporation	12-31-2009	Muni/Coop
Steven C. Cobb	Manager Transmission Services, Salt River Project	12-31-2008	Fed/State/Prov.
Dean Ulch	Principal Engineer, Transmission Policy and Services Group, Southern Company Services	12-31-2008	IOU
Edward Davis	Policy Consultant, Entergy Services, Inc.	12-31-2009	IOU
Julie Voeck	Manager Strategic Policy and Planning, American Transmission Company	12-31-2008	ITC
Bob Harshbarger	OASIS Trading Manager, Puget Sound Energy	12-31-2009	at large
Michelle Mizumori	Market Interface Manager, Western Electricity Coordinating Council (WECC)	12-31-2009	At-Large
GENERATION SEGMENT			
William J. Gallagher	Special Contracts Chief, Vermont Public Power Supply Authority	12-31-2009	Muni/Coop
Kathy York	Sr. Energy Markets & Policy Specialist, Tennessee Valley Authority	12-31-2008	Fed/State/Prov.
Jalal Babik	Manager – Electric Policy, Dominion Resource Services, Inc.	12-31-2008	IOU
John Ciza	Project Manager Energy Policy and Regulatory Affairs, Southern Company Services	12-31-2009	IOU
Ron Mucci	Consultant, Representing Entegra Power Group LLC	12-31-2008	Merchant
Gary Hinners	Director- West regulatory Issues, Reliant Energy, Inc.	12-31-2009	at large
Neal Balu	Director of Transmission Policy, Wisconsin Public Service Corporation	12-31-2009	at large
MARKETERS/BROKERS SEGMENT			
Clay A. Norris	Senior Vice President – Planning and Marketing, North Carolina Municipal Power Agency #1	12-31-2008	Muni/Coop
Belinda Thornton	General Manager - Energy Origination, Tennessee Valley Authority	12-31-2009	Fed/State/Prov.
Ralph Honeycutt	Director of Transmission Analysis & Operations – Merchant Management Group, SUEZ Energy Marketing NA, Inc.	12-31-2008	Not IOU Affiliated
Mark Mitchell	Manager of Power Marketing Supply and Trading Department, Salt River Project	12-31-2009	at large
John Apperson	Director – Commercial and Trading, PacifiCorp Energy	12-31-2008	IOU
Roy True	Manager of Regulatory and Markets Development, ACES Power Marketing	12-31-2009	at large
Barry Green	Barry Green Consulting (representing Electric Power Supply Association (EPSA))	12-31-2009	at large

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DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT		TERM END:	SUBSEGMENT:
Robert Williams	Director of Regulatory Affairs, Florida Municipal Power Agency	12-31-2008	Muni/Coop
V A C A N C Y		12-31-2009	Muni/Coop
Alan Pritchard	Senior Engineer, Duke Energy Corporation	12-31-2008	IOU
Jeffrey C. Mueller	Manager - ERO / RE Policy and Standards Interface, Public Service Electric and Gas Company	12-31-2009	IOU
Robert Martinko	Consultant FERC Compliance, FirstEnergy Service Company	12-31-2008	at large
Syd Berwager	Industry Restructuring Project Manager, Bonneville Power Administration/Power Business Line	12-31-2009	Other
Andy Rodriquez	Manager of Business Practice Coordination, NERC	12-31-2009	At-Large
END USERS SEGMENT			
V A C A N C Y		12-31-2009	at large
V A C A N C Y		12-31-2008	at large
Lou Ann Westerfield	Policy Strategist, Idaho Public Utilities Commission, rep. National Association of Regulatory Utility Commissioners	12-31-2008	Regulator
V A C A N C Y		12-31-2009	at large
V A C A N C Y		12-31-2008	at large
V A C A N C Y		12-31-2009	at large
Paul Sorenson	Director-Central Markets Strategy, Open Access Technology International, Inc.	12-31-2009	At-Large
INDEPENDENT GRID OPERATORS/PLANNERS			
Stu Bresler	General Manager, Market Operations, PJM Interconnection	12-31-2008	
Jim Castle	Manager, Grid Operations, New York Independent System Operator, Inc.	12-31-2008	
Matt Goldberg	Director Reliability & Operations Compliance ISO New England, Inc.	12-31-2008	
V A C A N C Y		12-31-2008	
Joel Mickey	Manager Market Operations Support, Electric Reliability Council of Texas	12-31-2009	
Ed Skiba	Technical Manager, Standards Compliance & Strategy, Midwest ISO	12-31-2009	
Charles Yeung	Executive Director Interregional Affairs, Southwest Power Pool	12-31-2009	

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NORTH AMERICAN ENERGY STANDARDS BOARD
2008 EXECUTIVE COMMITTEE ALTERNATES – Wholesale Electric Quadrant

END USER SEGMENT		**SUB-SEGMENT**
Bill Heinrich	New York State Dept. of Public Service	Regulators
DISTRIBUTION/LSE SEGMENT		**SUB-SEGMENT**
Shannon Black	Senior Regulatory and Contracts Specialist, Sacramento Municipal Utility District	Muni/Coop
Gerry Adamski	Vice President of Standards, NERC	At-Large
GENERATION SEGMENT		**SUB-SEGMENT**
Joel Dison	Project Manager, Southern Company Generation and Energy Marketing	IOU
Lou Oberski	Director – Electric Market Policy, Dominion Resources Services, Inc	IOU
Francis Halpin	Bonneville Power Administration	Fed/State/Prov.
MARKETER/BROKER SEGMENT		**SUB-SEGMENT**
Jeff Ackerman	Manager, CRSP-Energy Mgmt., Western Area Power Administration	Fed/State/Prov
Brenda Anderson	Bonneville Power Administration	Fed/State/Prov
Edison G. Elizeh	PacifiCorp	IOU Affiliated
Greg Locke	Manager, Strategic Analysis, ElectriCities of North Carolina	Muni/Coop
Valerie Crockett	Energy Markets & Policy Specialist, Tennessee Valley Authority	Fed/State/Prov
Carol McCrary	ElectriCities (North Carolina Municipal Power Agency #1)	Muni/Coop
TRANSMISSION SEGMENT		**SUB-SEGMENT**
Barbara Rehman	Policy Development & Analysis, Bonneville Power Administration	Fed/State/Prov.
Tim Ponseti	Tennessee Valley Authority	Fed/State/Prov.
Chuck Feagans	Tennessee Valley Authority	Fed/State/Prov.
Wendy Weathers	Principal Analyst, Salt River Project – Transmission and Generation Operations	Fed/State/Prov
Bob McKee	American Transmission Company	ITC
Brian Weber	Manager – Transmission Strategy and Policy, PacifiCorp	IOU
Jane Daly	Rate & Regulatory Advisor, Arizona Public Service Company	IOU
Marceline Otondo	Regulatory Compliance Advisory, Arizona Public Service Company	IOU
Narinder Saini	Policy Consultant, Entergy Services, Inc.	IOU
J.T. Wood	Southern Company Services	IOU
Daryl McGee	Manager – Transmission Services, Southern Company	IOU

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	Transmission
INDEPENDENT GRID OPERATORS/PLANNERS SEGMENT	**SUB-SEGMENT**
Brent Kingsford	Sr. Operations Regulatory Specialist, CAISO
Paul Wattles	Supervisor Demand Side Programs, Electric Reliability Council of Texas (ERCOT)
Bill Blevins	Sr. Market Support Analyst, Electric Reliability Council of Texas (ERCOT)
Robert Coughlin	Principal Scientist Reliability & Operations Compliance, ISO New England, Inc.
Cheryl Mendrala	Principal Engineer, ISO New England, Inc.
Brian Pedersen	Manager Transmission Services, Midwest ISO
Jason Marshall	Technical Manager, Midwest ISO
Dean Hartung	Manager Real Time Market Operations, PJM Interconnection
Carl Monroe	Sr. Vice President Operations & Chief Operating Officer, Southwest Power Pool
Greg Campoli	Supervisor – Reliability Compliance and Assessment, New York ISO
Diana Pommen	Director Interjurisdictional Affairs, Alberta Electric System Operator
Jimmy Womack	Manager-Tariff Administration, Southwest Power Pool

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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE ELECTRIC QUADRANT DRAFT AGENDA
Tuesday August 19, 2008 – 10:00 am to 4:00 pm MT

1. Welcome
   - Antitrust Guidelines
   - Welcome to members and attendees
   - Quorum Establishment: Roll Call of WEQ EC Members and Alternates
   - Adoption of WEQ Agenda (simple majority)
2. Wholesale Electric Quadrant Draft Minutes
   - Adoption of the WEQ EC Draft Meeting Minutes: http://www.naesb.org/pdf3/weq_ec051308dm.doc (simple majority)
3. Recommendations

   Discuss and consider recommendations for standards, including comments submitted, and vote on:

   a) 2008 WEQ Annual Plan Item 2.b.v.1 - ATC and AFC Calculation Methodologies Recommendation "No Action To Be Taken" - http://naesb.org/pdf3/weq_2008_ap_2bv1_rec.doc
      - Comments due May 23, 2008: None submitted.

   b) 2008 WEQ Annual Plan Item 2.b.vi - BPS to complement NERC Supplemental SAR Recommendation "No Action To Be Taken" - http://naesb.org/pdf3/weq_2008_ap_2bvi_rec.doc
      - Comments due June 4, 2008:
        B. Rehman, BPA - http://www.naesb.org/pdf3/weq_050508bpa.doc

   c) 2008 WEQ Annual Plan Item 2.b.ii.2 - Postbacks and Counterflows Recommendation - , (Redline) http://naesb.org/pdf3/weq_2008_api_2bii2_rec_redline.doc, (Clean) http://naesb.org/pdf3/weq_2008_api_2bii2_rec_clean.doc
      - Comments due June 23, 2008:
        K. York, TVA - http://www.naesb.org/pdf3/weq_052208tva.doc,
        B. Green, EPSA - http://www.naesb.org/pdf3/weq_052208epsa.doc,
        WEQ SRS - http://www.naesb.org/pdf3/weq_052208srs.doc,
        B. Rehman, BPA - http://www.naesb.org/pdf3/weq_052208bpa.doc

   d) 2008 WEQ Annual Plan Item 2.a.iv.4, 2.a.vi.4, and 2.b.ii.1 - ETC Recommendation - (Redline) http://naesb.org/pdf3/weq_2008_ap_2aiv4_2avi4_2bii1_rec_redline.doc, (Clean) http://naesb.org/pdf3/weq_2008_ap_2aiv4_2avi4_2bii1_rec_clean.doc
      - Comments due July 21, 2008:
        E. Davis, Entergy - http://www.naesb.org/pdf3/weq_062008entergy.doc,
        J. Cashin/B. Green, EPSA - http://www.naesb.org/pdf3/weq_062008epsa.doc,
        B. Rehman, BPA - http://www.naesb.org/pdf3/weq_062008bpa.doc,
        WEQ SRS - http://www.naesb.org/pdf3/weq_062008srs.doc,
        W. Weathers, SRP - http://www.naesb.org/pdf3/weq_062008srp.doc,
        J. Cummings, PPL Energy Plus - http://www.naesb.org/pdf3/weq_062008ppl.doc

   e) 2008 WEQ Annual Plan Item 6.d - Incorporating Demand Resources into Certain Ancillary Services Definitions Recommendation - http://naesb.org/pdf3/weq_2008_ap_6d_rec.doc
      - Comments due August 11, 2008:
        WEQ SRS - http://www.naesb.org/pdf3/weq_071108srs.doc,
        J. Dison, Southern Company Generation - http://www.naesb.org/pdf3/weq_071108southernco.doc,
        B. Rehman, BPA - http://www.naesb.org/pdf3/weq_071108bpa.doc,
        E. Davis, Entergy - http://www.naesb.org/pdf3/weq_071108entergy.doc

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WHOLESALE ELECTRIC QUADRANT DRAFT AGENDA
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f) 2008 WEQ Annual Plan Item 6.a/R07019 - Modifications to WEQ-006 for Interconnection Time Monitor Recommendation - (Redline) http://naesb.org/pdf3/r07019_rec_redline.doc, (Clean) http://naesb.org/pdf3/r07019_rec_clean.doc

- Comments due July 11, 2008:
  J. Busbin, Southern Company Transmission - http://www.naesb.org/pdf3/weq_061108southern.doc,
  E. Skiba, Midwest ISO (late comments) - http://www.naesb.org/pdf3/weq_061108miso.doc

g) 2008 WEQ Annual Plan Item 3.a.vi.1 - To address proposed enhancements for ALL pre-Order 888 ("grandfathered") Transmission and Ancillary Services in Current use in OASIS (R05026 E) Recommendation "No Further Action Be Taken" - http://www.naesb.org/pdf3/weq_2008_api_3avi1_rec.doc

- Comments due August 18, 2008:
  Comment period is still open and additional comments may be filed
  E. Davis, Entergy, http://www.naesb.org/pdf3/weq_071808_3avi1_entergy.doc

h) 2008 WEQ Annual Plan Item 2.b.i.2 - Address remaining requirements documented in R05004 and R05004A Recommendation "No Further Action Be Taken" - http://www.naesb.org/pdf3/weq_2008_api_2bi2_rec.doc

- Comments due August 18, 2008:
  Comment period is still open and additional comments may be filed,
  E. Davis, Entergy - http://www.naesb.org/pdf3/weq_071808_2bi2_entergy.doc

4. Minor Corrections (simple majority votes)

   Discuss and consider minor corrections to standards and final actions, and vote on:

   - Minor Correction to WEQ-001 Submitted by B. Rehman, BPA - http://naesb.org/pdf3/weq_ec081908w1.doc
   - Additional Minor Corrections to WEQ-001 Submitted by B. Rehman, BPA - http://naesb.org/pdf3/weq_ec081908w2.doc
   - Minor Corrections to WEQ-002, WEQ-003, and WEQ-013 Submitted by P. Sorenson, OATI - http://naesb.org/pdf3/weq_ec081908w3.doc

5. SRS Update Including EC guidance request: http://www.naesb.org/pdf3/weq_ec081908w7.doc. (request for guidance), and http://www.naesb.org/pdf3/weq_ec081908w5.ppt (subcommittee update)

6. Update on specific issues (no votes or action to be taken):

   - Order No. 890 Plan: http://www.naesb.org/pdf3/order890_073008_naesb_workplan_clean.doc (Plan), http://naesb.org/misc/Revised_FERC_Filing_Reference_Document_dhrrevised.doc (Items to file with FERC on August 29), http://www.naesb.org/pdf3/weq_atc_afc073008progress_report.xls (Progress Report), http://www.naesb.org/pdf3/weq_atc_afc073008action_items.xls(action Items)
   - DSM-EE efforts: (Wholesale) http://www.naesb.org/pdf3/dsmee073008w6.doc, (Retail) (http://www.naesb.org/pdf3/dsmee073008w5.doc)

7. Subcommittee Updates and Plan Updates – no votes to be taken, except on changes suggested for the 2008 plan or if changes are suggested for the triage directions already approved by both Triage and the WEQ EC

   - Triage (http://www.naesb.org/pdf3/tr081408agenda.doc)
   - Business Practices Subcommittee (BPS): http://www.naesb.org/pdf3/weq_ec081908w6.ppt
   - Electronic Scheduling (ESS) and Information Technology (ITS) Subcommittees
   - Joint Interchange Scheduling Working Group (JISWG)

8. Review, discuss, identify changes and vote to approve changes to the 2008 Annual Plan to be proposed to the Board of Directors. http://naesb.org/misc/WEQ_AP.doc (simple majority vote)

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WHOLESALE ELECTRIC QUADRANT DRAFT AGENDA
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9. Board of Directors, Board Committee and Regulatory Updates (no votes or action to be taken)
   - Board Updates: http://www.naesb.org/pdf3/bd062608dm.doc
   - Wholesale Gas and Retail key activities
   - FERC Order No. 676-C, WEQ Version 1.0: http://naesb.org/misc/NAESB_Update_notes.doc (Update Report)
   - eTariff classes
10. New Business
   - Update on ATC Information List: http://www.naesb.org/misc/weq_ec_atc081408a1.doc
   - Agenda items for November, including session on EC forum of roles and responsibilities
11. Adjourn

Attire – Business Casual

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July 12, 2008

TO: NAESB Wholesale Electric Quadrant Executive Committee and Interested Industry Participants

FROM: Cory Galik, Attorney

RE: WEQ Executive Committee Meeting Draft Minutes – May 13, 2008

NORTH AMERICAN ENERGY STANDARDS BOARD
EXECUTIVE COMMITTEE CONFERENCE CALL -- WHOLESALE ELECTRIC QUADRANT (WEQ)
AGA Offices, 400 North Capitol, Suite 450, Washington, D.C.
May 13, 2008
DRAFT MINUTES

1. Welcome

Ms. York called the meeting to order and welcomed the Executive Committee (EC) members and other participants. Ms. Galik gave the antitrust guidance and called the rolls of the Wholesale Electric Quadrant (WEQ) EC members. Quorum was established.

2. Adoption of Wholesale Electric Draft Agenda and Minutes

Wholesale Electric Draft Agenda: Ms. McQuade noted the agenda had more information than the EC book because the agenda linked to FERC documents. Ms. York said the group had worked hard on Order 890 standards, and as such, were able to move through a lot of standards to avoid two or three day meetings thanks to the single topic conference calls. She thanked Mr. Norris for chairing several of those meetings. Ms. York said agenda item 3A was one that would have discussion led by Mr. Sorenson, who had stepped out of the meeting. She proposed floating that item until Mr. Sorenson returned. The motion to adopt the agenda passed unanimously.

Wholesale Electric Draft Minutes from February 4-5, 2008: The motion to adopt was made by Mr. Rodriguez and seconded by Ms. Crockett. The motion passed unanimously.

Joint Wholesale Electric and Wholesale Gas Draft Minutes from February 29, 2008: Mr. Gallagher moved to adopt the minutes, seconded by Mr. Schwermann. Ms. McQuade noted the language bracketed in italics and recommended additional clarifications. These minutes will require approval also from the WGQ. The motion to adopt with the correction passed unanimously.

3. Discussion and consideration of recommendations for standards, comments submitted, and vote on:

2008 AP 2.a.i.5, 2.a.i.6, 2.a.ii.1-3 - Rebid of Partial Service, Preconfirmation Priority, Metrics, Redispatch Cost Posting: Mr. Sorenson said that revisions to the business practice standards were made to align with some of the technical OASIS changes for Order 890 requirements. The comments from the SRS subcommittee were mostly for clarification and numeration changes and typographical changes. The comments from the ESS/ITS/BPS subcommittee were submitted to eliminate confusion of the placeholder. They wanted to ensure there were not dual requirements. Midwest ISO comments and Southern Company comments were changes to add clarity but did not result in substantive changes. Bonneville Power Administration's comments were submitted to clarify an ambiguous definition relating to the provider evaluation time and customer confirmation time as well as the term "day ahead." Mr. Harshbarger asked if "day ahead" was intended as a defined term. Caution was recommended as day ahead as applied to firm service and non-firm service are different. Ms. Otondo asked if the language in table 4.2 was discussed by the subcommittee. The subcommittee did not look at it because it was not considered part of the scope of the activity. The term day ahead is contentious and is applied differently in both coasts. It was noted that day ahead term as stated in the table was confusing and there should be an indicator that the table does not imply a standard day ahead definition – either by a footnote or changing that cell of the table. Mr. Harshbarger agreed that the wording in the table was ambiguous. Ms. York said that would be more than a friendly amendment. PJM also submitted comments.

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Ms. York recommended getting a motion and then making any friendly amendments. A motion to adopt was made by Mr. Norris and seconded by Mr. Sorenson. Four potential amendments were discussed. Amendment 1: Mr. Sorenson moved to incorporate Amendment 1 as a friendly amendment. The motioner and seconder approved. Amendment 2: Mr. Berwager moved to amend table 4-2 but lacked a second and the motion died. In general discussion, Mr. Wood asked about including a general disclaimer stating that these standards apply except where the tariff would overrule. Ms. Otondo said that to the extent that anyone believed that the standards stood alone and could be applied separately, each one should have that phrase in the opening paragraph. If standards are looked at as a group, it should only be written once. Amendment 3: Mr. Norris asked to have a vote on all three PJM amendments. Mr. Bresler moved, seconded by Mr. Rodriguez to include the three PJM amendments. After discussion, the language of the footnote was changed to "short term firm reservations that are conditional as defined in section 13.2 in the pro forma tariff." The amendment passed unanimously. Mr. Sorenson withdrew amendment 4.

R03017 - Operate Within Limits: Ms. York said the recommendation was to maintain the status quo. The SRS reviewed the recommendation and the 2003 request and concluded that the majority was addressed or reflected in other requests. The SRS recommended closing the request. Ms. York made the motion, seconded by Mr. Norris and it passed a simple majority vote unanimously.

2008 AP 2.b.v.2 Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards: Mr. Skiba introduced the recommendation. The subcommittee reviewed NERC standards and determined no additional action by NAESB was required. Mr. Green addressed the comments submitted by EPSA. He suggested not taking action until the full requirements of publicly posting ATC related information is determined. Mr. Rodriguez stated that while NERC created a list of items to be exchanged, they intentionally did not specify the exchange method or process. Currently the ATC information list is included in annual plan item 2c as a separate development item. The motion was made by Mr. Norris and seconded by Mr. Davis. It passed a simple majority vote.

2008 AP 2.b.iv.1-3 TRM Business Practice Standards to complement the NERC reliability standards for TRM, including specification of the appropriate uses of TRM and when transmission providers may set aside TRM: Mr. Skiba introduced the recommendation and noted that it is addressed in other annual plan items. Mr. Green addressed the comments from EPSA, which included comments that the NAESB conclusions were not adequate. The recommendation should include documentation on usage of CBM to reach a determination on whether TRM was established appropriately. EPSA's comments are also submitted to NERC. Mr. Rodriguez added that NERC recognized the TRM standards were not as strong as they would have liked, they were attempting to create SAR for detail to TRM. They could not get TRM right with the amount of time they had because there was not consensus in the industry. The motion to adopt was made by Mr. Berwager and seconded by Mr. McGovern. The motion passed a simple majority vote.

4. Update on items currently out for comment

2008 WEQ Annual Plan Item 2.b.v.1: Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards: Mr. Skiba provided the update. This was another item that was maintaining the status quo. They went back and looked through ATC information links as well as modifications and it was approved by the EC in November of 2007.

2008 WEQ Annual Plan Item 2.b.vi: Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13: Mr. Skiba provided the update. This was another annual plan item tied to Order 890 although there was not a specific reference to an Order 890 cite. Last May, NERC created a supplemental SAR to do additional work on the mod standards to close out FAC 12 and 13. The subcommittee reviewed actions with the NERC ATC drafting team on May 13, 2008 and both agreed no further efforts were needed. Ms. York indicated that there may be subsequent votes.

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5. Update on specific issues

Order No. 890: ESS/ITS is actively debating BP standards for conditional firm service. There was a response deadline in Order No 890-A to have that filed by July 14 deadline. The subcommittee had planned for a submittal for industry comment and presentation to the WEQ EC to support the July 14 date but it is unlikely that the deadline will be met. Mr. Sorenson said conditional curtailment was a priority and network integration had been deferred until curtailment options were completed.

DSM-EE: Ms. McQuade provided a summary of the DSM-EE efforts. Forty-five wholesale electric market demand response programs have been defined by the ISOs and RTOs. The DR programs administered or planned in the retail market will follow the wholesale effort closely. They are to be added to a matrix and the measurement and verification characteristics listed for the functions within the various programs. NERC and NAESB are coordinating closely both on the NAESB development effort on business practices and the NERC effort to develop a survey. The retail effort should conclude one quarter after the wholesale effort on standards development for the DR programs for the M&V characteristics. After the first phase of development is completed, standards for energy efficiency should be addressed. North Carolina regulations have referenced NAESB DR standards already. Many participants ar not NAESB members.

Mr. Ulch wanted to know what actions were being taken to ensure that duplications (i.e. state counting and federal counting) did not occur when accounting for demand resources. Both NERC and NAESB are aware of this issue and are coordinating efforts. From a reliability perspective and for transmission planning, NERC has efforts underway.

Order 698: Ms. McQuade provided the review. A synopsis of the standards has been filed with the FERC. Ten different intraday nomination models were evaluated against criteria developed. The models submitted by FPL and TVA/APS passed a straw vote and the pipeline model came within one vote. As such these three models will be considered on May 19-20, 2008. Ms. Crockett noted that many proposals failed because they were reliant upon changes to the electric market clearing timelines, which would not be realized. Ms. McQuade noted that the redirect standards and price indexing standards would be voted on May 15, 2008 in the EC meeting. Redirects are complete.

e-Tariff: Ms. McQuade provided the update. Once filed with the FERC it took them two days to issue the NOPR, which could mean a final order shortly.

6. Subcommittee Updates and Plan Updates

- Triage Subcommittee

Four requests were reviewed which have been assigned:

- R08011: "Add AFC and TFC values to the "System_Attribute" data element of the NAESB Standard WEQ-003: OASIS S&CP Data Dictionaries" was assigned to the WEQ Electronic Scheduling Subcommittee/Information Technology Subcommittee (ESS/ITS).
- R08012: "Add two detail (contract) level code values to Validation Code and Message elements in Nomination Quick Response dataset to generate error message when nominated quantity is below EPSQ" was assigned to the WGQ Information Requirements subcommittee for action in the normal course of business.
- R08013: "Create a new nominations Transaction Type code value to support wheeling service on Rockies Express Pipeline LLC for nominations and all related documents where Transaction Type appears" was assigned to the WGQ Information Requirements subcommittee for action in the normal course of business.
- R08014: "Create a new nominations Transaction Type code value to support operational sales and operational purchases for nominations and all related documents where Transaction Type appears" was assigned to the WGQ Information Requirements subcommittee for action in the normal course of business.

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- Business Practices Subcommittee

Mr. Skiba provided the update on the BPS. The primary focus of the subcommittee's work is coordination with NERC on TLR standards regarding Order No. 890. Mr. Busbin as the NAESB co-chair and Mr. Li as the NERC co-chair have asked industry for additional participation. Ms. Rehman noted that TLR is primarily applied to the eastern connection and asked the status of the western interconnection. Mr. Skiba said there had only been an introductory meeting as of yet. Mr. Rodriguez clarified that the title of the request did not imply a replacement of congestion management. The group will focus on the next generation of TLR. Mr. Ulch asked who would write the operator's manual. Ms. York said she understood that it would be a NERC document and NAESB negotiated to give them a copyright waiver in order to put NAESB standards in the manual for version 1.0. Subsequent versions have not been addressed. It had not been determined how the manual would be maintained other than the TLR drafting team would be responsible for any changes. The standard was interwoven between the two organizations, making it difficult for one side to make changes without the other. Ms. McQuade said the FERC's NOPR adopting WEQ Version 001 standards included a consenting letter from Commissioner Wellinghoff who asked to include DR as an ancillary service. That request would be assigned to BPS.

- BPS/ESS/ITS

Mr. Skiba provided a review of the BPS/ESS/ITS activities. The subcommittee was well on their way to completing requirements for Order No. 890. Regarding the ATC Information Links (WEQ AP Item No. 2c), the subcommittee asked the Executive Committee for guidance on whether to have a list of the items that were publicly available or the items that were not publicly available. "Publicly available" can have different implementations - posting it on OASIS or available on request. After discussion, Ms. York noted the list would be a reference information used in ATC calculations, some of which may be publicly available and some of which was confidential based on third party arrangements or contractual provisions. Because of the difference in approaches, it was determined that the subcommittee would not longer address this issue and move forward with other Order No. 890 items. A task force will be created with named members, and it will make a recommendation on this item. The recommendation will go out for a 30 day comment and be presented to the EC for vote. Mr. Davis, Mr. Mucci, Mr. Yeung, Mr. Green, Ms. Weathers and Mr. Sorenson all agreed to participate in the task force.

- Joint Interchange Scheduling Working Group

Mr. Harshbarger said one of the items to be discussed at the next meeting was replacing Dunn's numbers. A list of e-tag 1.8.1 modifications was out for informal comment in an effort to get feedback.

- Standards Review Subcommittee

Mr. Skiba provided the review. He encouraged more involvement in the subcommittee. The subcommittee has valuable goals and objectives but very little participation. Ms. York said she would like to get more support for the SRS as well. She encouraged members to get their companies to participate on the calls. She suggested making an assignment list and rotate two or three EC members on each call.

7. Review, discuss, identify changes and vote to approve changes to the 2008 Annual Plan to be proposed to the Board of Directors.

Ms. McQuade had two items to be included under Item 6, Items D (modify WEQ 001 to reflect ancillary services may be provided by non-generation resources) and E (amend the NAESB WEQ definitions to address internal inconsistencies with NERC). Both were assigned to the fourth quarter. ESS/ITS will work on item D and the Joint Committee will work on E. There were concerns raised regarding DR as an ancillary service, which should be addressed as the modifications to WEQ-001 are made. Mr. Rodriguez noted that NERC received the same letter and they recognized that DR was important. A motion was made by Mr. Schwermann and seconded by Mr. Green to update the annual plan. The motion passed unanimously.

8. Board of Directors, Board Committee and Regulatory Updates

Due to time constraints, it was agreed that committee members would read the updates on their own.

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- Board Updates – March 27, 2008 Draft Meeting Minutes with discussion on segments and blocks
- Wholesale Gas and Retail key activities – WGQ Annual Plan, Retail Annual Plan, Bulletin
- Regulatory Updates:
- 4-11-08 Errata WEQ Version 1.0,
- 4-15-08 eTariff NAESB submittal,
- 4-16-08 Joint Interface Committee NERC, NAESB and IRC submittal,
- 4-17-08 NERC Request for Extension on Order No. 890,
- 4-17-08 FERC NOPR on eTariff,
- 4-21-08 FERC NOPR on WEQ Version 1.0, and
- 4-29-08 FERC Notice of Extension on Order No. 890

9. New Business

There was no new business to discuss.

10. Adjourn

Mr. Berwager moved to adjourn and Mr. Schwermann seconded the motion. The meeting was adjourned at 3:53 PM Eastern.

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11. Attendance and Voting Record

SEGMENT/EC MEMBER OR ALTERNATE/MEMBER COMPANY		SUBSEGMENT	ATTENDANCE	VOTE ON 2008 AP 2.a.i.5, 2.a.i.6, 2.a.ii.1-3	VOTE ON **R03017**	VOTE ON 2008 AP 2.b.v.2	VOTE ON 2008 AP 2.b.iv.1-3
TRANSMISSION SEGMENT							
Patrick McGovern	Georgia Transmission Corporation	Muni/Coop	Present		S	S	S
Wendy Weathers for S. Cobb	Salt River Project	Fed/State/Prov.	Phone	S	S	S	S
D. Ulch	Southern Company Services	IOU	Present	S	S	S	S
Edward Davis	Entergy Services, Inc.	IOU	Present	S	S	S	S
Julie Voeck	American Transmission Company	ITC					
Bob Harshbarger	Puget Sound Energy	at large	Present	S	S	S	S
Michael Wells	WECC	At-Large					
GENERATION SEGMENT							
William J. Gallagher	Vermont Public Power Supply Authority	Muni/Coop	Present	S	S	S	S
Kathy York	Tennessee Valley Authority	Fed/State/Prov.	Present	S	S	S	S
Jalal Babik	Dominion Resource Services, Inc.	IOU	Phone	S	S	S	S
John Ciza	Southern Company Services	IOU	Present	S	S	S	S
Ron Mucci	Entegra Power Group LLC	Merchant					
Gary Hinners	Reliant Energy, Inc.	at large	Phone	S	S	O	O
Neal Balu	Integrys Energy Services, Inc.	at large	Present	S	S	S	S
MARKETERS/BROKERS SEGMENT							
Clay A. Norris	North Carolina Municipal Power Agency #1	Muni/Coop	Present	S	S	S	S
Valerie Crockett for C. Harmon	Tennessee Valley Authority	Fed/State/Prov.	Present	S	S	S	S
Ralph Honeycutt	SUEZ Energy Marketing NA, Inc.	Not IOU Affiliated	Present	S	S	O	O
Mark Mitchell	Salt River Project	at large					
John Apperson	PacifiCorp Energy	IOU					

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SEGMENT/EC MEMBER OR ALTERNATE/MEMBER COMPANY		SUBSEGMENT	ATTENDANCE	VOTE ON 2008 AP 2.a.i.5, 2.a.i.6, 2.a.ii.1-3	VOTE ON R03017	VOTE ON 2008 AP 2.b.v.2	VOTE ON 2008 AP 2.b.iv.1-3
Barry Green	Electric Power Supply Association (EPSA)	at large	Present	S	S	O	O
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT (43% affirmative for M2)							
Robert Williams	Florida Municipal Power Agency	Muni/Coop					
Robert Schwermann	Sacramento Municipal Utility District	Muni/Coop	Present	S	S	S	S
Alan Pritchard	Duke Energy Corporation	IOU	Phone	S	S	S	S
Jeffrey C. Mueller	Public Service Electric and Gas Company	IOU	Present	S	S	S	S
Robert Martinko	FirstEnergy Service Company	at large	Present	S	S	S	S
Syd Berwager	Bonneville Power Administration	Other	Present	S	S	S	S
Andy Rodriquez	NERC	At-Large	Present	S	S	S	S
		END USERS SEGMENT					
Lou Ann Westerfield	NARUC	Regulator					
Paul Sorenson	Open Access Technology International, Inc.	At-Large	Phone	S	S	S	S
INDEPENDENT GRID OPERATORS/PLANNERS							
Stu Bresler	PJM Interconnection		Present	S	S	S	S
J. Castle	New York Independent System Operator, Inc.		Phone	S	S	S	S
Matt Goldberg	ISO New England, Inc.		Present	S	S	S	S
Steve Greenleaf	California ISO		Present	S	S	S	S
Bill Blevins for Joel Mickey	Electric Reliability Council of Texas		Present	S	S	S	S
Larry Middleton	Midwest ISO		Phone	S	S	S	S
Charles Yeung	Southwest Power Pool		Present	S	S	S	S
QUORUM (50% of 36 seated members is 18)		Attendance	29				
TYPE OF VOTE (SIMPLE OR SUPER MAJORITY)				Super	Simple	Simple	Simple

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SEGMENT/EC MEMBER OR ALTERNATE/MEMBER COMPANY	SUBSEGMENT	ATTENDANCE	VOTE ON 2008 AP 2.a.i.5, 2.a.i.6, 2.a.ii.1-3	VOTE ON **R03017**	VOTE ON 2008 AP 2.b.v.2	VOTE ON 2008 AP 2.b.iv.1-3
VOTE TALLY	Total Affirmative		29	29	26	26
	Opposing		0	0	3	3
	Abstentions		0	0	0	0
	Votes Outstanding		n/a	n/a	n/a	n/a
OUTCOME			Pass	Pass	Pass	Pass

Notes:

- In the voting column, a blank indicates that the EC member did not attend, was not present when the vote was called, did not return a ballot prior to the meeting, or did not return a ballot after the meeting.
- A vote of "Abstain" in the voting column for M2, a super-majority vote, has the same effect as a negative vote and contributes as such to the overall result, but the submitter is casting a vote that is neither in support nor in opposition.

Other Participant Attendance

Participant	Organization
John Babik	Dominion Resources
David Barr	Ontario Power Generation
Jim Castle	New York ISO
Deonne Cunningham	NAESB
Cory Galik	NAESB
Daryl McGee	Southern Company
Rae McQuade	NAESB
Larry Middleton	Midwest ISO
Ron Mucci	Representing Entegra Power Group
Marcie Otondo	Arizona Public Service
Marjorie Perlman	Energy East
Alan Pritchard	Duke Energy
Barbara Rehman	BPA

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Other Participant Attendance

Participant	Organization
Narinder Saini	Entergy
Ed Skiba	Midwest ISO
Veronica Thomason	NAESB
JT Wood	Southern Company

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Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 890, our subcommittees have accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one ballotting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

April 22, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 AP Item 2.b.v.1**
Request Title:	**Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards**

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
_XX_Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

____Change to Existing Practice
_XX_Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___Initiation
___ Modification
___Interpretation
_XX_Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
__Business Process Documentation

Per Recommendation:

___Initiation
___ Modification
___Interpretation
_XX_Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
__X12 Implementation Guide
__Business Process Documentation

3. RECOMMENDATION

SUMMARY:

After a thorough review of the Summary of ATC Directives in FERC Orders 890 and 890-A, on March 28, 2008 and April 7, 2008 the Joint WEQ ESS/ITS and WEQ BPS developed the BPS/ESS/ITS Concepts AFC-ATC Recommendation document to verify if all issues concepts has been captured in other recommendations or would be captured in future recommendations. After reviewing each item the subcommittee determined no additional standards needed to be developed under this recommendation.

RECOMMENDED STANDARDS:

April 22, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 AP Item 2.b.v.1**
Request Title:	**Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards**

No additional standards are required from what is already documented in the ATC Information Link (2008 Annual Plan 2.b.vii) and what is required for ATC postings under the previously ratified recommendation Modifcations to WEQ-001 to comply with modifications to 18 C.F.R. 37.6 and 37.7 within Order 890 with Minor Corrections applied on February 27, 2008.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

WEQ 2008 Annual Plan Item

2.b.v. Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)):

(1) Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards.

FERC Order 890 References

301 Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)):

- Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards (Paragraph 301 will require coordination with the NERC Order 890 reliability standards development).

FERC Order 890-A References:

53. We clarify in response to NorthWestern that TRM may be used to accommodate the procurement of ancillary services used to provide service under the pro forma OATT. We deny as premature EPSA's and Williams' requests for clarification regarding the realtime determination and posting of ATC and AFC values, as well as posting of utilization of transmission provider's own system ETC. In Order No. 890, the

April 22, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 AP Item 2.b.v.1**
Request Title:	**Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards**

Commission required an exchange of the data both for short and long-term ATC/AFC calculation that will increase the accuracy of ATC calculations.[33] The Commission also required that ATC be recalculated by all transmission providers on a consistent time interval, and in a manner that closely reflects the actual topology of the system, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data, and that NERC/NAESB revise the related reliability standard and business practices accordingly.[34] EPSA and William should address their concerns through the NERC and NAESB processes implementing these requirements.

60.Order No. 890 requires NERC and NAESB to develop a single set of ATC-related standards that will apply to all transmission providers, including RTOs and ISOs. We understand that the NERC ATC standard drafting team includes representatives from various industry sectors, including RTOs/ISOs, and we encourage NYISO to participate in the standard development process to provide NERC an opportunity to address its concerns. To the extent NYISO feels its concerns are not address in this process, it should bring the issue to the Commission's attention on review of the resulting reliability standards.

101.The Commission directed public utilities, working through NERC and NAESB, to revise reliability standard MOD-001 to require ATC to be recalculated by all transmission providers on a consistent time interval and in a manner that closely reflects the actual topology of the system, e.g., generation and transmission outages, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data. The Commission stated that this process must also consider whether ATC should be calculated more frequently for constrained facilities.

104.The Commission agrees with Powerex that the standards adopted through the NERC and NAESB processes should serve as minimum or "no less frequent than" requirements to recalculate ATC. Transmission providers also must update their ATC calculation when they receive substantial and material changes in data, such as updated load forecasts, changes in topology and dispatch patterns, which may be more frequent than the NERC and NAESB standards would otherwise require. In the absence of substantial and material changes in data, transmission providers are not required to update ATC on a more frequent basis than the minimum frequency that the NERC and NAESB standards require, once implemented. The Commission will consider the adequacy of the time frame for ATC updates on review of these standards.

148. In Order No. 890, the Commission required transmission providers to make available, upon request, all data used to calculate ATC, TTC, CBM and TRM for any constrained posted path. We believe that this adequately addresses Constellation's request for access to modeling data used by the transmission provider. Specifically, we expect transmission providers to make available, upon request and subject to

April 22, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 AP Item 2.b.v.1**
Request Title:	**Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards**

appropriate confidentiality protections and CEII requirements, the following modeling data: (1) load flow base cases and generation dispatch methodology; (2) contingency, subsystem, monitoring, change files and accompanying auxiliary files; (3) transient and dynamic stability simulation data and reports on flowgates which are not thermally limited; (4) list of transactions used to update the base case for transmission service request study; (5) special protection systems and operating guides, and specific description as to how they are modeled; (6) model configuration settings; (7) dates and capacities of new and retiring generation; (8) new and retired generation included in the model for future years; (9) production cost models (including assumptions, settings, study results, input data, etc.), subject to reasonable and applicable generator confidentiality limitations; (10) searchable transmission maps, including PowerWorld or PSSE diagrams; (11) OASIS names to Common Names table and PTI bus numbers; and, (12) flowgate and interface limits including limit category (thermal, steady state or transient, voltage or angular). We decline, however, to require the transmission provider to post this information on OASIS, as Constellation suggests. We conclude that making this information available on request provides sufficient transparency for customers without unduly burdening the transmission provider.

149.With regard to the modeling support information sought by Constellation, we believe much of this information should already be stated in each transmission provider's Attachment C. In Order No. 890, the Commission required each transmission provider to set forth in the Attachment C to its OATT the ATC calculation methodology used by the transmission provider. To the extent necessary, we clarify that the step-by-step modeling study methodology and criteria for adding or eliminating flowgates (permanent and temporary) is part of the ATC methodology that must be stated in the transmission provider's Attachment C. We direct any transmission provider that has failed to include this information in its Attachment C to include that information as part of the compliance filing directed in section II.C. If the transmission provider has already satisfied this obligation in a previous compliance filing, it should refer to that filing instead.

150.We deny as premature Constellation's request to require OASIS postings of additional model benchmarking and forecasting data/TSR study audit data. Such information would be utilized in the process of updating and benchmarking models to actual events, which is the subject of ongoing efforts to modify relevant reliability standards from the MOD and facilities design, connections and maintenance (FAC) groups.

152. We deny TDU Systems' request to require transmission providers to grant customers access to proprietary modeling software used to calculate ATC values. The Commission believes at this time that the requirements of Order No. 890 are sufficient

April 22, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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Requesters:	**ESS/ITS/BPS Subcommittee**
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Request Title:	**Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards**

to achieve the Commission's transparency goals without further requiring the disclosure of proprietary software.

b. Description of Recommendation:

No additional changes are required.

c. Business Purpose:

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

March 28, 2008

April 7, 2008

April 16, 2008

Please review the Motions Document:
http://www.naesb.org/pdf3/weq_atc_afc041608a1.doc

Please review the Concepts Document:
http://www.naesb.org/pdf3/weq_atc_afc041608a2.doc

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Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

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The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one balloting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last, but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

May 2, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.vi**
Request Title:	**Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13**

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
_X_Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
___Modification	___Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The Joint ESS/ITS & BPS subcommittee reviewed the 2008 WEQ Annual Plan Item:

2.b.vi Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13.

This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development.

May 2, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.vi**
Request Title:	**Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13**

After thorough review of the documentation and discussions with NERC, the subcommittee has determined no further NAESB Business Practice standards are required for this Annual Plan Item.

Prior to making this decisions:

- The subcommitee co-chairs received an email from Andy Rodriquez of NERC indicating that there was no additional work required associated to the SAR for FAC-012 and FAC-012 http://www.naesb.org/pdf3/weq_atc_afc050108w4.txt.
- The NAESB Joint ESS/ITS & BPS subcomittee met with the NERC ATC Drafting Team on May 1, 2008, to discuss the SAR to identify if there were any items associated to this SAR which were not included in MOD's 001, 004, 008, 028, 029, and 030. There was only one concern raised during this conference call as to whether the NAESB Joint Subcommittee had addressed MOD 003.
- The Joint ESS/ITS & BPS also met in a separate meeting on May 1, 2008, to review this annual plan item. In this meeting concern was raised as to whether MOD 003 had been addressed. It was pointed out that the subcommitee had discussed MOD 003 in detail and reached a decision in 2007 on how to proceed with incoporating MOD 003. Upon review of the May 3, 2007 Final Meeting Minutes, the Joint subcommittee determined (on May 1, 2008) that MOD 003 had been addressed by NAESB and had been appropriately included in the ATC Information Link Recommendation.

The Joint Subcommittee is recommending that no additional NAESB Business Practice Standards be developed in support of this annual plan item. The joint subcommittee has opted to take no action on these annual plan item, as the requirements have been addressed in previously submitted FERC Order 890 recommendations.

RECOMMENDED STANDARDS:

No new standards are recommended.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

WEQ 2008 Annual Plan Item:

May 2, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.vi**
Request Title:	**Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13**

2.b.vi Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13.

This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development.

b. Description of Recommendation:

No additional NAESB Business Practices need to be developed to support this WEQ 2008 Annual Plan Item.

c. Business Purpose:

Meet business practice requirements associated with the NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

1. The NERC Standards Authorization Request associated to this Annual Plan Item is posted at: Sup ATC SAR Draft 2 - Clean - 8/3/07
2. Documents reviewed by the Joint Subcommittee include:
   - Email from Andy Rodriquez dated April 22, 2008 http://www.naesb.org/pdf3/weq_atc_afc050108w4.txt
   - Joint ESS/ITS & BPS May 3, 2007 Final Meeting Minutes
3. The following documents include discussion and the disposition of WEQ 2008 Annual Plan Item 2.b.vi:
   - Joint NERC/NAESB AFC/ATC May 1, 2008, Draft Meeting Minutes
   - Joint WEQ ESS/ITS & BPS May 1, 2008, Draft Meeting Minutes
   - BPS/ESS/ITS Motions 2.b.vi Recommendations: http://naesb.org/pdf3/weq_atc_afc050108a1.doc

Formal Comments of the Bonneville Power Administration on 2008 WEQ Annual Plan Item 2.b.vi, Business Practice Standards to Complement New NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13

Comment 1: Joint/Multiple Ownership Facilities

There is a need to resolve the discrepancy between the language in the NERC MOD003 and the NAESB ATC Information Link proposal, 2008 AP Item 2.b.vii, to identify the appropriate ATC Methodology Contact for questions or concerns on TTC and ATC methodologies and values associated with multiple ownership facilities. This discrepancy could be resolved simply with the addition of the following contact information links under the ATC Information link on the Transmission Provider's OASIS Home Page (as underlined and in red text):

001-13.1.5 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC, that information shall be found in the CBM Implementation Document – CBMID or TRM Implementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links:

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC Methodology Contact (as required by WEQ-001-xx), as applicable,
  - Single Ownership Facilities
  - Joint/Mulitiple Ownership Facilitie-s
- Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5 [*"n" represents 2008 WEQ Annual Plan Item 2.b.vii]*)

Background:

MOD03, as originally adopted by the NERC Board of Trustees on February 8, 2005, required each Regional Reliability Organization (RRO) to develop and document a procedure on how transmission users can input their concerns or questions regarding the TTC and ATC methodology and values of the Transmission Service Provider(s) and how these concerns or questions will be addressed. This language provided for procedural consistency within each RRO for transmission users. Moreover, it allowed for a central point of contact, i.e, the RRO, for concerns/questions regarding TTC values of multiple ownership facilities.

The ATC MODs currently being developed by NERC seem to accommodate TTC calculations associated with joint/multiple ownership facilities, e.g., MOD-001 R9 (DATA EXCHANGE); however the NAESB ATC Information Link proposal applies to individual Transmission Providers. See 001 – xx.1 language below:

001 – XX.1 **Procedure for Addressing ATC Methodology Questions**

The Transmission Provider shall respond to questions related to the applicable ATC methodologies, including but not limited to derivation of values, underlying assumptions or data inputs within one week of the receipt by the Transmission

Formal Comments of the Bonneville Power Administration
on 2008 WEQ Annual Plan Item 2.b.vi,
Business Practice Standards to Complement New NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13

> Provider's ATC Methodology Contact and shall respond to the question or shall provide an estimate of the amount of time needed to respond. Such questions must be submitted to the contact specified by the Transmission Provider 's contact information under the ATC Information Link as specifed under WEQ-001-13.1.5.

This proposed single Transmission Provider point of contact for any TTC questions related to joint/multiple ownership facilities therefore would not be appropriate and could lead to inconsistent information provided to transmission users.

Comment 2: Redaction Criteria

In the ATC Information Link proposal, it is not clear which criteria individual Transmission Providers will use to justify the "ability to redact certain provisions due to market, security or reliability sensitivity concerns." Although NERC and NAESB have worked jointly to develop a list of information that would not be publicly available due to such concerns, the list is not established in a NAESB standard, nor is there currently a proposal to do so. There should be a standard to more clearly identify the scope of "Market Sensitive Information", "CEII Information", Security Sensitive Information" or "Reliability Sensitive Information".

Background:

- The subcommitee co-chairs received an email from Andy Rodriquez of NERC indicating that there was no additional work required associated to the SAR for FAC-012 and FAC-012 http://www.naesb.org/pdf3/weq_atc_afc050108w4.txt.
- The NAESB Joint ESS/ITS & BPS subcomittee met with the NERC ATC Drafting Team on May 1, 2008, to discuss the SAR to identify if there were any items associated to this SAR which were not included in MOD's 001, 004, 008, 028, 029, and 030. There was only one concern raised during this conference call as to whether the NAESB Joint Subcommittee had addressed MOD 003.
- The Joint ESS/ITS & BPS also met in a separate meeting on May 1, 2008, to review this annual plan item. In this meeting concern was raised as to whether MOD 003 had been addressed. It was pointed out that the subcommitee had discussed MOD 003 in detail and reached a decision in 2007 on how to proceed with incoporating MOD 003. Upon review of the May 3, 2007 Final Meeting Minutes, the Joint subcommittee determined (on May 1, 2008) that MOD 003 had been addressed by NAESB and had been appropriately included in the ATC Information Link Recommendation.

There is a June 6th meeting of the WEQ EC Group Addressing List of ATC Related Information to discuss:

1. the need for the list and its treatment by NAESB
2. if needed, identify the components of the list

The outcome of this Group discussion should be considered prior to the EC vote on the Recommendation item, 2008 AP Item 2.b.vi.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

1. RECOMMENDED ACTION:

_X_ Accept as requested
___ Accept as modified below
___ Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___ Change to Existing Practice
___ Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
_X_ Initiation	_X_ Initiation
___ Modification	___ Modification
___ Interpretation	___ Interpretation
___ Withdrawal	___ Withdrawal
___ Principle	___ Principle
___ Definition	___ Definition
___ Business Practice Standard	_X_ Business Practice Standard
___ Document	___ Document
___ Data Element	___ Data Element
___ Code Value	___ Code Value
___ X12 Implementation Guide	___ X12 Implementation Guide
___ Business Process Documentation	___ Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The WEQ 2008 Annual Plan Item Item 2.b.ii states, "Business practice standards for accounting for counterflows. These standards will be included in the ATC business practice standards." As a part of this annual plan item, Postbacks have also been included per discussions between the NERC and NAESB during the Joint NERC/NAESB AFC/ATC meetings.

The Joint ESS/ITS and BPS has determined that no additional work will be done for accounting for counterflows based upon the NERC MOD-001 and the letter from Rae McQuade to Jerry Adamski and Andy Rodriquez dated May 1, 2008. The NERC MOD standard states:

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

R3. Each Transmission Service Provider shall prepare and keep current an Available Transfer Capability Implementation Document (ATCID) that includes, at a minimum, the following information: *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*

R3.1. Information describing how the selected methodology (or methodologies) has been implemented, in such detail that, given the same information used by the Transmission Service Provider, the results of the ATC or AFC calculations can be validated.

R3.2. A description of the manner in which the Transmission Service Provider will account for counterflows including:

R3.2.1. How confirmed Transmission reservations, expected Interchange and internal counterflow are addressed in firm and non-firm ATC or AFC calculations.

R3.2.2. A rationale for the defined accounting.

Since accounting for counterflows is documented in the ATCID and the Joint ESS/ITS and BPS has submitted the recommendation 2008 AP Item 2.b.vii (WEQ-001 changes for "ATC Information Link" on OASIS and TTC and ATC methodologies and values), which requires posting the ATCID on the ATC Information Link webpage, the subcommittee believes it has addressed the requirement for counterflows through the previous recommendation. Therefore, the remainder of this recommendation is limited in scope to Postback.

The Subcommittee recommends adoption of the following standards.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS/BPS Subcommittees**
Request No.:	**2008AP 2.b.ii.2**
Request Title:	**Postbacks and Counterflows Business Practice Standards**

RECOMMENDED STANDARDS:

Modifications to WEQ-001 (New Requirements)

Business Practices for Open Access Same-Time Information Systems (OASIS)

001-13.1.5 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC, that information shall be found in the CBM Implementation Document – CBMID or TRM Implementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links:

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC Methodology Contact (as required by WEQ-001-xx)
- Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5 [*"n" represents 2008 WEQ Annual Plan Item 2.b.vii]*)
- Postback Methodology

The posting of this information would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns. Any section that has been redacted shall retain the heading and will include the reason for the redaction. Appropriate reasons for redaction are: "Market Sensitive Information", "CEII Information", "Security Sensitive Information" or "Reliability Sensitive Information".

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to ATC Information. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the ATC Information Link above may require the user to register with the individual OASIS sites according to WEQ-002-3.1.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

Business Practice Standards for Postback

NOTE: NAESB Staff will assign appropriate enumeration to this standard to replace "n" with next sequential standard number within WEQ-001

001-0.n **Postback**

A variable component of the Transmission Provider's selected ATC or AFC calculation methodology that positively impacts ATC or AFC based on a change in status of a transmission service reservation or use of reserved capacity, or other conditions as specified by the Transmission Provider.

001-n **POSTBACK REQUIREMENTS**

The Transmission Provider shall incorporate Postbacks in the Available Transfer Capability (ATC) posted on OASIS due to a change in status of transmission reservations or unscheduled firm transmission service or other conditions according to the following standards. (See table and examples in Appendix nn.)

001-n.1 **Determination of Postback**

001-n.1.1 If there is a change in status or a reduction to the reserved capacity associated with a transmission service reservation, any capacity made available on the Transmission Provider's facilities shall be incorporated as a Postback in the calculation of firm and non-firm ATC or AFC, as appropriate. Such modifications include:

- Annullment of the reservation
- Redirect of transmission service on a firm basis
- Recall of transmission capacity

001-n.1.2 The Transmission Provider shall provide for the releasing of unscheduled firm capacity in their calculation of non-firm ATC or AFC, as appropriate.

001-n.1.2.1 When unscheduled firm capacity is to be released to non-firm ATC or AFC, as appropriate, as identified in the Transmission Provider's Tariff, if all firm reserved capacity is included in the Existing Transmission Commitments (ETC) component for use in the calculation of non-firm ATC or AFC, as appropriate, the Transmission Provider shall incorporate a postback of unscheduled firm reserved capacity in the calculation of non-firm ATC or AFC, as appropriate.

001-n.1.2.2 When unscheduled firm capacity is to be released to non-firm ATC or AFC, as appropriate, as identified in the Transmission Provider's Tariff, if only the scheduled capacity of a firm reservation is included in ETC for use in the

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS/BPS Subcommittees**
Request No.:	**2008AP 2.b.ii.2**
Request Title:	**Postbacks and Counterflows Business Practice Standards**

calculation of non-firm ATC or AFC, as appropriate, a Postback is not needed in the calculation.

001-n.1.2.3 If theTransmission Provider incorporates a business practice that increases the non-firm ATC or AFC, as appropriate, offering due to unscheduled firm capacity by using the energy profile instead of the transmission allocation specified in a Request for Interchange (RFI), then this method of adjusting ATC or AFC, as appropriate, must be documented in the Transmission Provider's Postback Methodology.

001-n.1.3 The incorporation of any additional items applied as Postbacks to either firm or non-firm ATC or AFC calculation methodology, as appropriate, must be documented in the Transmission Provider's Postback Methodology.

001-n.2 **Postback Methodology**

The Transmission Provider's methodology for determining and incorporating Postbacks into the ATC or AFC calculation methodology, as appropriate, shall be documented and posted under the ATC Information Link as a separate bullet titled "Postback Methodology".

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

001-nn **APPENDIX nn – POSTBACK CONDITIONS FOR USE IN CALCULATION OF ATC OR AFC, AS APPROPRIATE**

Table xx

The table below identifies potential Postbacks and the conditions for use by the Transmission Provider in the determination of firm and non-firm ATC or AFC, as appropriate.

Postback Condition	WEQ-001 Reference for Determination of FATC[1]	WEQ-001 Reference for Determination of NFATC[2] for calculations *prior* to the time identified in the Transmission Provider's tariff for release of unscheduled firm	WEQ-001 Reference for Determination of NFATC for calculations *after* to the time identified in the Transmission Provider's tariff for release of unscheduled firm
1. ANNULLED, DISPLACED, recalled firm reservation posts back to FATC and may also post back to NFATC depending on the horizon and whether the reservation was scheduled prior to being modified.	WEQ-001-n.1.1	WEQ-001-n.1.1	WEQ-001-n.1.2 as applicable and if schedule is curtailed
2. ANNULLED, DISPLACED, recalled non-firm reservation posts back to NFATC depending on the horizon and whether the reservation was scheduled prior to being modified.	N/A	WEQ-001-n.1.1	WEQ-001-n.1.2 as applicable and if schedule is curtailed

[1] FATC as used in this Table XX includes Firm ATC and Firm AFC, as appropriate.
[2] NFATC as used in this Table XX includes Non-Firm ATC and Non-Firm AFC, as appropriate.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

Postback Condition	WEQ-001 Reference for Determination of FATC[1]	WEQ-001 Reference for Determination of NFATC[2] for calculations ***prior*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm	WEQ-001 Reference for Determination of NFATC for calculations ***after*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm
3. Firm Redirect of a firm PTP causes post back to FATC on the path of the Parent reservations' path for the time interval of the firm Redirect and may also post back to NFATC depending on the horizon. (Note: non-firm Redirect of a Firm reservation does not impact the firm ATC on the Parent Reservation's path.)	WEQ-001-n.1.1	WEQ-001-n.1.1	N/A
4. Firm Redirect of a firm PTP may cause post back to FATC on the path of the Parent reservations' path for rollover rights that were set-aside in the firm ATC calculation. This is dependent on the term of the firm Redirect.	WEQ-001-n.1.1	WEQ-001-n.1.1	N/A
5. Downward adjustments and terminations of firm Network schedule (7FN) may post back to NFATC depending on the horizon.	N/A	N/A	WEQ-001-n.1.2 as applicable

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

Postback Condition	WEQ-001 Reference for Determination of FATC[1]	WEQ-001 Reference for Determination of NFATC[2] for calculations ***prior*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm	WEQ-001 Reference for Determination of NFATC for calculations ***after*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm
6. Downward adjustments and terminations of Firm PTP schedules (7F) may post back to NFATC depending on the horizon.	N/A	N/A	WEQ-001-n.1.2 as if applicable
7. Unscheduled firm Network reservations posts back to NFATC.	N/A	N/A	WEQ-001-n.1.2 as applicable
8. Unscheduled firm PTP reservations posts back to NFATC.	N/A	N/A	WEQ-001-n.1.2 as applicable
9. Termination of a DNR that then results in the termination/ reduction of a firm transmission reservation posts back to FATC and may also post back to NFATC depending on the horizon and whether the reservation was scheduled prior to being terminated.	WEQ-001-n.1.1	WEQ-001-n.1.1	WEQ-001-n.1.2 as applicable and if schedule is curtailed
10. Terminated Secondary Network reservation posts back to NFATC.	N/A	WEQ-001-n.1.1	WEQ-001-n.1.1
11. RELINQUISH secondary non-firm PTP capacity.	N/A	WEQ-001-n.1.1	WEQ-001-n.1.1

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

Example

Examples of the application of different Postback categories and its effect on NFATC[3] depending on the way transmission service is applied during the scheduling horizon:

If you have 100 MW of firm reservations, and 60 MW were scheduled (40 MW unscheduled) on that 100 MW, during the scheduling horizon:

> FATC[4] = TTC – 100 (ETC Firm) – CBM – TRM (prior to the scheduling horizon)

Postback as applied in WEQ-001-n.1.2.1: NFATC = TTC – 100 (ETC Firm) – CBM – TRM + 40 (Postback = 40)

Postback as applied in WEQ-001-n.1.2.2: NFATC = TTC – 60 (ETC Firm) – CBM – TRM + 0 (Postback = 0)

4. SUPPORTING DOCUMENTATION

a. Description of Request:

Annual Plan Item 2.b.ii - Business practice standards for accounting for counterflows. These standards will be included in the ATC business practice standards (Paragraph 293 will require coordination with the NERC Order 890 reliability standards development).

On August 16, 2007 the scope of this item was expanded to include Postback requirements per NERC and NAESB joint coordination discussions.

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions about the requirement for Postbacks and counterflow:

> **Paragraph 293 -** *With regard to EPSA's request for the standardization of additional data input, we believe they are already captured in the Commission's proposal as adopted in this Final Rule. Xcel asks the Commission to require*

[3] NFATC as used in this Example XX includes Non-Firm ATC and Non-Firm AFC, as appropriate.
[4] FATC as used in this Example XX includes Firm ATC and Firm AFC, as appropriate.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

consistency in the determination of counterflows in the calculation of ATC. Counterflows are included in the list of assumptions that public utilities, working through NERC, are required to make consistent. We believe that counterflows, if treated inconsistently, can adversely affect reliability and competition, depending on how they are accounted for. Accordingly, we reiterate that public utilities, working through NERC and NAESB, are directed to develop an approach for accounting for counterflows, in the relevant ATC standards and business practices. We find unnecessary Xcel's request that we require a date certain for specific issues in the Western Interconnection to be addressed. Above we require public utilities, working through NERC, to modify the ATC standards within 270 days after the publication of the Final Rule in the Federal Register.

b. Description of Recommendation:

Adding new section in WEQ-001 for Postbacks, modifying Section WEQ-001-13.1.5 and adding appendix to WEQ-001. No additional standards are required to address counterflows other than those submitted under recommendation Annual Plan Item 2.b.vii.

c. Business Purpose:

Implementation of FERC Orders 890 and 890-A.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

This recommendation is dependent on the ratification of the ATC Information Link Annual Plan Item 2.b.vii.

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

- August 16-17, 2007
- August 28, 2007
- August 29, 2007 NERC/NAESB Meeting
- September 11-12, 2007
- March 5, 2008 NERC/NAESB Meeting
- March 10-13, 2008
- April 16-17, 2008
- May 14-16, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS/BPS Subcommittees**
Request No.:	**2008AP 2.b.ii.2**
Request Title:	**Postbacks and Counterflows Business Practice Standards**

Please review the Motions Document:

http://naesb.org/pdf3/weq_atc_afc051408a2.doc

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

1. RECOMMENDED ACTION:

_X_Accept as requested
___Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:
___Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

__X__Initiation
___Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

Per Recommendation:

__X__Initiation
___Modification
___Interpretation
___Withdrawal

___Principle
___Definition
_X_Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The WEQ 2008 Annual Plan Item Item 2.b.ii states, "Business practice standards for accounting for counterflows. These standards will be included in the ATC business practice standards." As a part of this annual plan item, Postbacks have also been included per discussions between the NERC and NAESB during the Joint NERC/NAESB AFC/ATC meetings.

The Joint ESS/ITS and BPS has determined that no additional work will be done for accounting for counterflows based upon the NERC MOD-001 and the letter from Rae McQuade to Jerry Adamski and Andy Rodriquez dated May 1, 2008. The NERC MOD standard states:

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

R3. Each Transmission Service Provider shall prepare and keep current an Available Transfer Capability Implementation Document (ATCID) that includes, at a minimum, the following information: *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*

R3.1. Information describing how the selected methodology (or methodologies) has been implemented, in such detail that, given the same information used by the Transmission Service Provider, the results of the ATC or AFC calculations can be validated.

R3.2. A description of the manner in which the Transmission Service Provider will account for counterflows including:

R3.2.1. How confirmed Transmission reservations, expected Interchange and internal counterflow are addressed in firm and non-firm ATC or AFC calculations.

R3.2.2. A rationale for the defined accounting.

Since accounting for counterflows is documented in the ATCID and the Joint ESS/ITS and BPS has submitted the recommendation 2008 AP Item 2.b.vii (WEQ-001 changes for "ATC Information Link" on OASIS and TTC and ATC methodologies and values), which requires posting the ATCID on the ATC Information Link webpage, the subcommittee believes it has addressed the requirement for counterflows through the previous recommendation. Therefore, the remainder of this recommendation is limited in scope to Postback.

The Subcommittee recommends adoption of the following standards.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

RECOMMENDED STANDARDS:

Modifications to WEQ-001 (New Requirements)

Business Practices for Open Access Same-Time Information Systems (OASIS)

001-13.1.5 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC, that information shall be found in the CBM Implementation Document – CBMID or TRM Implementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links:

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC Methodology Contact (as required by WEQ-001-xx)
- Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5 [*"n" represents 2008 WEQ Annual Plan Item 2.b.vii]*)
- Postback Methodology

The posting of this information would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns. Any section that has been redacted shall retain the heading and will include the reason for the redaction. Appropriate reasons for redaction are: "Market Sensitive Information", "CEII Information", "Security Sensitive Information" or "Reliability Sensitive Information".

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to ATC Information. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the ATC Information Link above may require the user to register with the individual OASIS sites according to WEQ-002-3.1.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

Business Practice Standards for Postback

NOTE: NAESB Staff will assign appropriate enumeration to this standard to replace "n" with next sequential standard number within WEQ-001

001-0.n **Postback**

A variable component of the Transmission Provider's selected ATC or AFC calculation methodology that positively impacts ATC or AFC based on a change in status of a transmission service reservation or use of reserved capacity, or other conditions as specified by the Transmission Provider.

001-n **POSTBACK REQUIREMENTS**

The Transmission Provider shall incorporate Postbacks in the Available Transfer Capability (ATC) posted on OASIS due to a change in status of transmission reservations or unscheduled firm transmission service or other conditions according to the following standards. (See table and examples in Appendix nn.)

001-n.1 **Determination of Postback**

001-n.1.1 If there is a change in status or a reduction to the reserved capacity associated with a transmission service reservation, any capacity made available on the Transmission Provider's facilities shall be incorporated as a Postback in the calculation of firm and non-firm ATC or AFC, as appropriate. Such modifications include:

- Annullment of the reservation
- Redirect of transmission service on a firm basis
- Recall of transmission capacity

001-n.1.2 The Transmission Provider shall provide for the releasing of unscheduled firm capacity in their calculation of non-firm ATC or AFC, as appropriate.

001-n.1.2.1 When unscheduled firm capacity is to be released to non-firm ATC or AFC, as appropriate, as identified in the Transmission Provider's Tariff, if all firm reserved capacity is included in the Existing Transmission Commitments (ETC) component for use in the calculation of non-firm ATC or AFC, as appropriate, the Transmission Provider shall incorporate a postback of unscheduled firm reserved capacity in the calculation of non-firm ATC or AFC, as appropriate.

001-n.1.2.2 When unscheduled firm capacity is to be released to non-firm ATC or AFC, as appropriate, as identified in the Transmission Provider's Tariff, if only the scheduled capacity of a firm reservation is included in ETC for use in the

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

calculation of non-firm ATC or AFC, as appropriate, a Postback is not needed in the calculation.

001-n.1.2.3 If theTransmission Provider incorporates a business practice that increases the non-firm ATC or AFC, as appropriate, offering due to unscheduled firm capacity by using the energy profile instead of the transmission allocation specified in a Request for Interchange (RFI), then this method of adjusting ATC or AFC, as appropriate, must be documented in the Transmission Provider's Postback Methodology.

001-n.1.3 The incorporation of any additional items applied as Postbacks to either firm or non-firm ATC or AFC calculation methodology, as appropriate, must be documented in the Transmission Provider's Postback Methodology.

001-n.2 Postback Methodology

The Transmission Provider's methodology for determining and incorporating Postbacks into the ATC or AFC calculation methodology, as appropriate, shall be documented and posted under the ATC Information Link as a separate bullet titled "Postback Methodology".

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

001-nn **APPENDIX nn – POSTBACK CONDITIONS FOR USE IN CALCULATION OF ATC OR AFC, AS APPROPRIATE**

Table xx

The table below identifies potential Postbacks and the conditions for use by the Transmission Provider in the determination of firm and non-firm ATC or AFC, as appropriate.

Postback Condition	WEQ-001 Reference for Determination of FATC[1]	WEQ-001 Reference for Determination of NFATC[2] for calculations ***prior*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm	WEQ-001 Reference for Determination of NFATC for calculations ***after*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm
1. ANNULLED, DISPLACED, recalled firm reservation posts back to FATC and may also post back to NFATC depending on the horizon and whether the reservation was scheduled prior to being modified.	WEQ-001-n.1.1	WEQ-001-n.1.1	WEQ-001-n.1.2 as applicable and if schedule is curtailed
2. ANNULLED, DISPLACED, recalled non-firm reservation posts back to NFATC depending on the horizon and whether the reservation was scheduled prior to being modified.	N/A	WEQ-001-n.1.1	WEQ-001-n.1.2 as applicable and if schedule is curtailed

[1] FATC as used in this Table XX includes Firm ATC and Firm AFC, as appropriate.
[2] NFATC as used in this Table XX includes Non-Firm ATC and Non-Firm AFC, as appropriate.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

Postback Condition	WEQ-001 Reference for Determination of FATC[1]	WEQ-001 Reference for Determination of NFATC[2] for calculations ***prior*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm	WEQ-001 Reference for Determination of NFATC for calculations ***after*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm
3. Firm Redirect of a firm PTP causes post back to FATC on the path of the Parent reservations' path for the time interval of the firm Redirect and may also post back to NFATC depending on the horizon. (Note: non-firm Redirect of a Firm reservation does not impact the firm ATC on the Parent Reservation's path.)	WEQ-001-n.1.1	WEQ-001-n.1.1	N/A
4. Firm Redirect of a firm PTP may cause post back to FATC on the path of the Parent reservations' path for rollover rights that were set-aside in the firm ATC calculation. This is dependent on the term of the firm Redirect.	WEQ-001-n.1.1	WEQ-001-n.1.1	N/A
5. Downward adjustments and terminations of firm Network schedule (7FN) may post back to NFATC depending on the horizon.	N/A	N/A	WEQ-001-n.1.2 as applicable

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

Postback Condition	WEQ-001 Reference for Determination of FATC[1]	WEQ-001 Reference for Determination of NFATC[2] for calculations ***prior*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm	WEQ-001 Reference for Determination of NFATC for calculations ***after*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm
6. Downward adjustments and terminations of Firm PTP schedules (7F) may post back to NFATC depending on the horizon.	N/A	N/A	WEQ-001-n.1.2 as if applicable
7. Unscheduled firm Network reservations posts back to NFATC.	N/A	N/A	WEQ-001-n.1.2 as applicable
8. Unscheduled firm PTP reservations posts back to NFATC.	N/A	N/A	WEQ-001-n.1.2 as applicable
9. Termination of a DNR that then results in the termination/ reduction of a firm transmission reservation posts back to FATC and may also post back to NFATC depending on the horizon and whether the reservation was scheduled prior to being terminated.	WEQ-001-n.1.1	WEQ-001-n.1.1	WEQ-001-n.1.2 as applicable and if schedule is curtailed
10. Terminated Secondary Network reservation posts back to NFATC.	N/A	WEQ-001-n.1.1	WEQ-001-n.1.1
11. RELINQUISH secondary non-firm PTP capacity.	N/A	WEQ-001-n.1.1	WEQ-001-n.1.1

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

Example

Examples of the application of different Postback categories and its effect on NFATC[3] depending on the way transmission service is applied during the scheduling horizon:

If you have 100 MW of firm reservations, and 60 MW were scheduled (40 MW unscheduled) on that 100 MW, during the scheduling horizon:

FATC[4] = TTC – 100 (ETC Firm) – CBM – TRM (prior to the scheduling horizon)

Postback as applied in WEQ-001-n.1.2.1: NFATC = TTC – 100 (ETC Firm) – CBM – TRM + 40 (Postback = 40)

Postback as applied in WEQ-001-n.1.2.2: NFATC = TTC – 60 (ETC Firm) – CBM – TRM + 0 (Postback = 0)

4. SUPPORTING DOCUMENTATION

a. Description of Request:

Annual Plan Item 2.b.ii - Business practice standards for accounting for counterflows. These standards will be included in the ATC business practice standards (Paragraph 293 will require coordination with the NERC Order 890 reliability standards development).

On August 16, 2007 the scope of this item was expanded to include Postback requirements per NERC and NAESB joint coordination discussions.

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions about the requirement for Postbacks and counterflow:

[3] NFATC as used in this Example XX includes Non-Firm ATC and Non-Firm AFC, as appropriate.
[4] FATC as used in this Example XX includes Firm ATC and Firm AFC, as appropriate.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

Paragraph 293 - *With regard to EPSA's request for the standardization of additional data input, we believe they are already captured in the Commission's proposal as adopted in this Final Rule. Xcel asks the Commission to require consistency in the determination of counterflows in the calculation of ATC. Counterflows are included in the list of assumptions that public utilities, working through NERC, are required to make consistent. We believe that counterflows, if treated inconsistently, can adversely affect reliability and competition, depending on how they are accounted for. Accordingly, we reiterate that public utilities, working through NERC and NAESB, are directed to develop an approach for accounting for counterflows, in the relevant ATC standards and business practices. We find unnecessary Xcel's request that we require a date certain for specific issues in the Western Interconnection to be addressed. Above we require public utilities, working through NERC, to modify the ATC standards within 270 days after the publication of the Final Rule in the Federal Register.*

b. Description of Recommendation:

Adding new section in WEQ-001 for Postbacks, modifying Section WEQ-001-13.1.5 and adding appendix to WEQ-001. No additional standards are required to address counterflows other than those submitted under recommendation Annual Plan Item 2.b.vii.

c. Business Purpose:

Implementation of FERC Orders 890 and 890-A.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

This recommendation is dependent on the ratification of the ATC Information Link Annual Plan Item 2.b.vii.

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

- August 16-17, 2007
- August 28, 2007
- August 29, 2007 NERC/NAESB Meeting
- September 11-12, 2007
- March 5, 2008 NERC/NAESB Meeting
- March 10-13, 2008
- April 16-17, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS/BPS Subcommittees**
Request No.:	**2008AP 2.b.ii.2**
Request Title:	**Postbacks and Counterflows Business Practice Standards**

- May 14-16, 2008

Please review the Motions Document:

http://naesb.org/pdf3/weq_atc_afc051408a2.doc

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

1. RECOMMENDED ACTION:

_X_ Accept as requested
___ Accept as modified below
___ Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___ Change to Existing Practice
___ Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
_X_ Initiation	_X_ Initiation
___ Modification	___ Modification
___ Interpretation	___ Interpretation
___ Withdrawal	___ Withdrawal
___ Principle	___ Principle
___ Definition	___ Definition
___ Business Practice Standard	_X_ Business Practice Standard
___ Document	___ Document
___ Data Element	___ Data Element
___ Code Value	___ Code Value
___ X12 Implementation Guide	___ X12 Implementation Guide
___ Business Process Documentation	___ Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The WEQ 2008 Annual Plan Item Item 2.b.ii states, "Business practice standards for accounting for counterflows. These standards will be included in the ATC business practice standards." As a part of this annual plan item, Postbacks have also been included per discussions between the NERC and NAESB during the Joint NERC/NAESB AFC/ATC meetings.

The Joint ESS/ITS and BPS has determined that no additional work will be done for accounting for counterflows based upon the NERC MOD-001 and the letter from Rae McQuade to Jerry Adamski and Andy Rodriquez dated May 1, 2008. The NERC MOD standard states:

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

R3. Each Transmission Service Provider shall prepare and keep current an Available Transfer Capability Implementation Document (ATCID) that includes, at a minimum, the following information: *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*

R3.1. Information describing how the selected methodology (or methodologies) has been implemented, in such detail that, given the same information used by the Transmission Service Provider, the results of the ATC or AFC calculations can be validated.

R3.2. A description of the manner in which the Transmission Service Provider will account for counterflows including:

R3.2.1. How confirmed Transmission reservations, expected Interchange and internal counterflow are addressed in firm and non-firm ATC or AFC calculations.

R3.2.2. A rationale for the defined accounting.

Since accounting for counterflows is documented in the ATCID and the Joint ESS/ITS and BPS has submitted the recommendation 2008 AP Item 2.b.vii (WEQ-001 changes for "ATC Information Link" on OASIS and TTC and ATC methodologies and values), which requires posting the ATCID on the ATC Information Link webpage, the subcommittee believes it has addressed the requirement for counterflows through the previous recommendation. Therefore, the remainder of this recommendation is limited in scope to Postback.

The Subcommittee recommends adoption of the following standards.

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS/BPS Subcommittees**
Request No.:	**2008AP 2.b.ii.2**
Request Title:	**Postbacks and Counterflows Business Practice Standards**

RECOMMENDED STANDARDS:

Modifications to WEQ-001 (New Requirements)

Business Practices for Open Access Same-Time Information Systems (OASIS)

001-13.1.5 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC, that information shall be found in the CBM Implementation Document – CBMID or TRM Implementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links:

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC Methodology Contact (as required by WEQ-001-xx)
- Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5 [*"n" represents 2008 WEQ Annual Plan Item 2.b.vii]*)
- Postback Methodology

The posting of this information would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns. Any section that has been redacted shall retain the heading and will include the reason for the redaction. Appropriate reasons for redaction are: "Market Sensitive Information", "CEII Information", "Security Sensitive Information" or "Reliability Sensitive Information".

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to ATC Information. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the ATC Information Link above may require the user to register with the individual OASIS sites according to WEQ-002-3.1.

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

Business Practice Standards for Postback

NOTE: NAESB Staff will assign appropriate enumeration to this standard to replace "n" with next sequential standard number within WEQ-001

001-0.n **Postback**

A variable component of the Transmission Provider's selected ATC or AFC calculation methodology that positively impacts ATC or AFC based on a change in status of a transmission service reservation or use of reserved capacity, or other conditions as specified by the Transmission Provider.

001-n **POSTBACK REQUIREMENTS**

The Transmission Provider shall incorporate Postbacks in the Available Transfer Capability (ATC) or AFC posted on OASIS due to a change in status of transmission reservations or unscheduled firm transmission service or other conditions according to the following standards. (See table and examples in Appendix nn.)

001-n.1 **Determination of Postback**

001-n.1.1 If there is a change in status or a reduction to the reserved capacity associated with a transmission service reservation, any capacity made available on the Transmission Provider's facilities shall be incorporated as a Postback in the calculation of firm and non-firm ATC or AFC, as appropriate. Such modifications include:

- Annullment of the reservation
- Redirect of transmission service on a firm basis
- Recall of transmission capacity

001-n.1.2 The Transmission Provider shall provide for the releasing of unscheduled firm capacity in their calculation of non-firm ATC or AFC, as appropriate.

001-n.1.2.1 When unscheduled firm capacity is to be released to non-firm ATC or AFC, as appropriate, as identified in the Transmission Provider's Tariff, if all firm reserved capacity is included in the Existing Transmission Commitments (ETC) component for use in the calculation of non-firm ATC or AFC, as appropriate, the Transmission Provider shall incorporate a postback of unscheduled firm reserved capacity in the calculation of non-firm ATC or AFC, as appropriate.

001-n.1.2.2 When unscheduled firm capacity is to be released to non-firm ATC or AFC, as appropriate, as identified in the Transmission Provider's Tariff, if only the scheduled capacity of a firm reservation is included in ETC for use in the

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS/BPS Subcommittees**
Request No.:	**2008AP 2.b.ii.2**
Request Title:	**Postbacks and Counterflows Business Practice Standards**

calculation of non-firm ATC or AFC, as appropriate, a Postback is not needed in the calculation.

001-n.1.2.3 If theTransmission Provider incorporates a business practice that increases the non-firm ATC or AFC, as appropriate, offering due to unscheduled firm capacity by using the energy profile instead of the transmission allocation specified in a Request for Interchange (RFI), then this method of adjusting ATC or AFC, as appropriate, must be documented in the Transmission Provider's Postback Methodology.

001-n.1.3 The incorporation of any additional items applied as Postbacks to either firm or non-firm ATC or AFC calculation methodology, as appropriate, must be documented in the Transmission Provider's Postback Methodology.

001-n.2 **Postback Methodology**

The Transmission Provider's methodology for determining and incorporating Postbacks into the ATC or AFC calculation methodology, as appropriate, shall be documented and posted under the ATC Information Link as a separate bullet titled "Postback Methodology".

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

001-nn **APPENDIX nn – POSTBACK CONDITIONS FOR USE IN CALCULATION OF ATC OR AFC, AS APPROPRIATE**

Table xx

The table below identifies potential Postbacks and the conditions for use by the Transmission Provider in the determination of firm and non-firm ATC or AFC, as appropriate.

Postback Condition	WEQ-001 Reference for Determination of FATC[1]	WEQ-001 Reference for Determination of NFATC[2] for calculations *prior* to the time identified in the Transmission Provider's tariff for release of unscheduled firm	WEQ-001 Reference for Determination of NFATC for calculations *after* to the time identified in the Transmission Provider's tariff for release of unscheduled firm
1. ANNULLED, DISPLACED, recalled firm reservation posts back to FATC or FAFC and may also post back to NFATC or NFAFC depending on the horizon and whether the reservation was scheduled prior to being modified.	WEQ-001-n.1.1	WEQ-001-n.1.1	WEQ-001-n.1.2 as applicable and if schedule is curtailed
2. ANNULLED, DISPLACED, recalled non-firm reservation posts back to NFATC or NFAFC depending on the horizon and whether the reservation was scheduled prior to being modified.	N/A	WEQ-001-n.1.1	WEQ-001-n.1.2 as applicable and if schedule is curtailed

[1] FATC as used in this Table XX includes Firm ATC and Firm AFC, as appropriate.
[2] NFATC as used in this Table XX includes Non-Firm ATC and Non-Firm AFC, as appropriate.

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

Postback Condition	WEQ-001 Reference for Determination of FATC[1]	WEQ-001 Reference for Determination of NFATC[2] for calculations ***prior*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm	WEQ-001 Reference for Determination of NFATC for calculations ***after*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm
3. Firm Redirect of a firm PTP causes post back to FATC or FAFC on the path of the Parent reservations' path for the time interval of the firm Redirect and may also post back to NFATC or NFAFC depending on the horizon. (Note: non-firm Redirect of a Firm reservation does not impact the firm ATC or AFC on the Parent Reservation's path.)	WEQ-001-n.1.1	WEQ-001-n.1.1	N/A
4. Firm Redirect of a firm PTP may cause post back to FATC or FAFC on the path of the Parent reservations' path for rollover rights that were set-aside in the firm ATC or AFCcalculation. This is dependent on the term of the firm Redirect.	WEQ-001-n.1.1	WEQ-001-n.1.1	N/A
5. Downward adjustments and terminations of firm Network schedule (7FN) may post back to NFATC or NFAFC depending on the horizon.	N/A	N/A	WEQ-001-n.1.2 as applicable

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008AP 2.b.ii.2
Request Title: Postbacks and Counterflows Business Practice Standards

Postback Condition	WEQ-001 Reference for Determination of FATC[1]	WEQ-001 Reference for Determination of NFATC[2] for calculations ***prior*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm	WEQ-001 Reference for Determination of NFATC for calculations ***after*** to the time identified in the Transmission Provider's tariff for release of unscheduled firm
6. Downward adjustments and terminations of Firm PTP schedules (7F) may post back to NFATC or NFAFC depending on the horizon.	N/A	N/A	WEQ-001-n.1.2 as if applicable
7. Unscheduled firm Network reservations posts back to NFATC or NFAFC.	N/A	N/A	WEQ-001-n.1.2 as applicable
8. Unscheduled firm PTP reservations posts back to NFATC or NFAFC.	N/A	N/A	WEQ-001-n.1.2 as applicable
9. Termination of a DNR that then results in the termination/ reduction of a firm transmission reservation posts back to FATC or FAFC and may also post back to NFATC or NFAFC depending on the horizon and whether the reservation was scheduled prior to being terminated.	WEQ-001-n.1.1	WEQ-001-n.1.1	WEQ-001-n.1.2 as applicable and if schedule is curtailed
10. Terminated Secondary Network reservation posts back to NFATC or NFAFC.	N/A	WEQ-001-n.1.1	WEQ-001-n.1.1
11. RELINQUISH secondary non-firm PTP capacity.	N/A	WEQ-001-n.1.1	WEQ-001-n.1.1

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

Example

Examples of the application of different Postback categories and its effect on NFATC or NFAFC[3] depending on the way transmission service is applied during the scheduling horizon:

If you have 100 MW of firm reservations, and 60 MW were scheduled (40 MW unscheduled) on that 100 MW, during the scheduling horizon:

> FATC[4] = TTC – 100 (ETC Firm) – CBM – TRM (prior to the scheduling horizon)

Postback as applied in WEQ-001-n.1.2.1: NFATC = TTC – 100 (ETC Firm) – CBM – TRM + 40 (Postback = 40)

Postback as applied in WEQ-001-n.1.2.2: NFATC = TTC – 60 (ETC Firm) – CBM – TRM + 0 (Postback = 0)

4. SUPPORTING DOCUMENTATION

a. Description of Request:

Annual Plan Item 2.b.ii - Business practice standards for accounting for counterflows. These standards will be included in the ATC business practice standards (Paragraph 293 will require coordination with the NERC Order 890 reliability standards development).

On August 16, 2007 the scope of this item was expanded to include Postback requirements per NERC and NAESB joint coordination discussions.

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions about the requirement for Postbacks and counterflow:

> **Paragraph 293 -** *With regard to EPSA's request for the standardization of additional data input, we believe they are already captured in the Commission's proposal as adopted in this Final Rule. Xcel asks the Commission to require*

[3] NFATC as used in this Example XX includes Non-Firm ATC and Non-Firm AFC, as appropriate.
[4] FATC as used in this Example XX includes Firm ATC and Firm AFC, as appropriate.

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 2.b.ii.2**
Request Title: **Postbacks and Counterflows Business Practice Standards**

consistency in the determination of counterflows in the calculation of ATC. Counterflows are included in the list of assumptions that public utilities, working through NERC, are required to make consistent. We believe that counterflows, if treated inconsistently, can adversely affect reliability and competition, depending on how they are accounted for. Accordingly, we reiterate that public utilities, working through NERC and NAESB, are directed to develop an approach for accounting for counterflows, in the relevant ATC standards and business practices. We find unnecessary Xcel's request that we require a date certain for specific issues in the Western Interconnection to be addressed. Above we require public utilities, working through NERC, to modify the ATC standards within 270 days after the publication of the Final Rule in the Federal Register.

b. Description of Recommendation:

Adding new section in WEQ-001 for Postbacks, modifying Section WEQ-001-13.1.5 and adding appendix to WEQ-001. No additional standards are required to address counterflows other than those submitted under recommendation Annual Plan Item 2.b.vii.

c. Business Purpose:

Implementation of FERC Orders 890 and 890-A.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

This recommendation is dependent on the ratification of the ATC Information Link Annual Plan Item 2.b.vii.

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

- August 16-17, 2007
- August 28, 2007
- August 29, 2007 NERC/NAESB Meeting
- September 11-12, 2007
- March 5, 2008 NERC/NAESB Meeting
- March 10-13, 2008
- April 16-17, 2008
- May 14-16, 2008

Comments Submitted by B. Rehman, BPA

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS/BPS Subcommittees**
Request No.:	**2008AP 2.b.ii.2**
Request Title:	**Postbacks and Counterflows Business Practice Standards**

Please review the Motions Document:

http://naesb.org/pdf3/weq_atc_afc051408a2.doc

EPSA COMMENTS IN RESPONSE TO

RECOMMENDATION ON WEQ ANNUAL PLAN ITEM 2.b.ii.2

POSTBACKS AND COUNTERFLOWS

EPSA submits the following comments with respect to the Recommendation on WEQ Annual Plan Item 2.b.ii.2 with respect to postbacks and counterflows and specifically that no further action be taken with respect to counterflows. These comments are being offered in the context of the current version of NERC standard MOD-001 on ATC (posted for comment on April 16th) of which requirement 3.2 states that the ATCID will include "a description of the manner in which the TSP will account for counterflows."

Comments similar to those offered by EPSA herein have been filed with NERC. These comments are also very similar to our comments previously submitted to both NERC and NAESB with respect to the two organizations' standards on TRM.

Assuming that the current draft of NERC MOD-001 is ultimately approved by the NERC Board and that this recommendation from the NAESB subcommittee is adopted, the industry would have completed its work on counterflows and EPSA cannot agree that the mandate given by FERC to NERC and to NAESB has been carried out.

Paragraph 293 of Order 890, cited in the recommendation presented to the Executive Committee, includes the following language:

Xcel asks the Commission to require consistency in the determination of counterflows in the calculation of ATC. ***Counterflows are included in the list of assumptions that public utilities, working through NERC, are required to make consistent.****(emphasis added) We believe that counterflows, if treated inconsistently, can adversely affect reliability and competition, depending on how they are accounted for. Accordingly, we reiterate that public utilities, working through NERC and NAESB, are directed to develop an approach for accounting for counterflows, in the relevant ATC standards and business practices.*

Yet, if the current versions of the NERC and NAESB standards with respect to counterflows are the versions presented to the Commission, the obligations on Transmission Providers will be only to post their methodology and no progress towards consistency will have been achieved.

These standards on counterflows are reminiscent of the previous NERC standard on ATC which was developed in response to Order 888. It required only that Transmission Operators document their methodology for calculating ATC, much like other fill-in-the-blank standards. Clearly in approving Order 890 and more particularly in Order 693 where they declined to approve other industry fill-in-the-blank standards, FERC has determined that such a standard is insufficient. Yet, with respect to counterflows, the industry, through NERC and NAESB, seems prepared to submit standards to FERC that demonstrate that very little progress has been made.

For these reasons, EPSA cannot support the standard as currently drafted.

Comments Submitted by TVA on Proposed NAESB Recommendation for 2008 Annual Plan Item 2.b.ii.2 (Postbacks and Counterflows)

Comments are as follows:

NAESB should define if unscheduled nonfirm transmission reservations should be posted back or not. If NAESB wishes to leave this flexible, NAESB should specifically require the entity's practices to be defined in a document for transparency.

NAESB should define the point at which firm (and/or nonfirm) transmission reservations are considered unscheduled. If NAESB wishes to leave this flexible, NAESB should specifically require the entity's practices to be defined in a document for transparency.

NAESB should remove all, "as appropriate" because it adds confusion to the requirements because it makes the requirements sound like the requirements only have to be followed when the entity deems it "appropriate." We understand that the phrase is supposed to apply to the ATC or AFC option, but the present wording is very redundant.

The use of the words, "as appropriate", "potential" (in Table xx), "if applicable" and requirements like 001-n.1.3 seems to make the standard ambiguous and somewhat "fill in the blank".

Your consideration to these comments is greatly appreciated.

TVA

Comments Submitted by TVA on Proposed NAESB Recommendation for 2008 Annual Plan Item 2.b.ii.2 (Postbacks and Counterflows)

Comments are as follows:

NAESB should define if unscheduled nonfirm transmission reservations should be posted back or not. If NAESB wishes to leave this flexible, NAESB should specifically require the entity's practices to be defined in a document for transparency.

NAESB should define the point at which firm (and/or nonfirm) transmission reservations are considered unscheduled. If NAESB wishes to leave this flexible, NAESB should specifically require the entity's practices to be defined in a document for transparency.

NAESB should remove all, "as appropriate" because it adds confusion to the requirements because it makes the requirements sound like the requirements only have to be followed when the entity deems it "appropriate." We understand that the phrase is supposed to apply to the ATC or AFC option, but the present wording is very redundant.

The use of the words, "as appropriate", "potential" (in Table xx), "if applicable" and requirements like 001-n.1.3 seems to make the standard ambiguous and somewhat "fill in the blank".

Your consideration to these comments is greatly appreciated.

TVA

FORMAL COMMENTS

Quadrant:	Wholesale Electric Quadrant
Recommendation:	**Number:** 2008 AP Item 2.b.ii.2
	Title: Postbacks and Counterflows Business Practice Standards
Submitted By:	Standards Review Subcommittee
Date:	June 23, 2008

Under the Standards Review Subcommittee (SRS) Scope of Work, which was approved by the SRS on March 6, 2008, the SRS agreed to review recommendations and if subcommittee deemed appropriate, they would submit advisory comments to the Executive Committee for consideration. As stated in the Scope of Work these comments are "not intended to change the scope of the Business Practices or recommendation, but to provide consistency and uniformity across all WEQ Business Practices."

The SRS is requesting the Executive Committee consider the following advisory comments in their review of this recommendation.

- Revise the NOTE on NAESB staff assigning the appropriate enumeration as follows: **NOTE: NAESB Staff will assign appropriate enumeration to this standard to replace "n" with next sequential standard number within WEQ-001, "nn" with the next sequential appendix letter within WEQ-001, and xx with the next sequential Table Number within WEQ-001.**
- In Table xx within APPENDIX nn revise the header in column 4 as follows: **WEQ-001 Reference for Determination of NFATC for calculations *after* ~~to~~ the time identified in the Transmission Provider's tariff for release of unscheduled firm**
- In the Example section of APPENDIX XX footnotes 3 and 4 both refer to Example XX. The Example is not enumerated so the XX should be deleted from both footnotes.
    - [3] NFATC as used in this Example ~~XX~~ includes Non-Firm ATC and Non-Firm AFC, as appropriate.
    - [4] FATC as used in this Example ~~XX~~ includes Firm ATC and Firm AFC, as appropriate.
- The cover letter that was included on previous recommendations submitted by the Joint ESS/ITS and BPS subcommittee for the NERC related standards was not a part of this recommendation. Should the cover letter be included when the recommendation is sent for membership ratification?

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **WEQ Joint ESS/ITS and BPS Subcommittee**
Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
Request Title: **Existing Transmission Commitments**

Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 890, our subcommittees have accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one balloting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

1. RECOMMENDED ACTION:

___Accept as requested
__X Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

__X__Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
__X Modification	_X_Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The recommendation is intended to address the NAESB Existing Transmission Commitments requirements in FERC Order 890 under Docket numbers RM05-17 and RM05-25 in paragraphs 243, 244, and 246 and in FERC Order 890-A under Docket number RM05-17 and RM05-25 in paragraphs 63 and 151.

This recommendation addresses the WEQ 2008 Annual Plan Items:

2.a.iv.4 Posting of Existing Transmission Commitments (ETC)

2.a.vi.4 Posting of Existing Transmission Commitments (ETC)

2.b.ii.1 Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **WEQ Joint ESS/ITS and BPS Subcommittee**
Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
Request Title: **Existing Transmission Commitments**

The business practices developed to address this item will require coordination with the NERC Order 890 reliability standards development.

The Joint ESS/ITS and BPS Subcommittee reviewed the NERC MOD Standards MOD-028 (Area Interchange Methodology), MOD-029 (Rated System Path Methodology) and MOD-030 (Flowgate Methodology) and determined that scope of this recommendation would be limited to those ETC components, which they agreed were not addressed adequately in the existing standards or included in the scope of work assigned to the ESS/ITS Subcommittee. As a result of this decision the scope of the recommendation has been limited to the Grandfathered Agreement and Rollover Rights components of the ETC. There will not be a separate section for ETC.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

RECOMMENDED STANDARDS:

Modifications to WEQ-001 (New Requirements)

Business Practice Standards for Posting the ETC Components

NOTE: NAESB Staff will assign appropriate enumeration to this standard to replace "x" and "y" with next sequential standard number within WEQ-001

001-x **Grandfathered Agreements**

The Transmission Provider shall identify in the ATCID the treatment of grandfathered agreements in the ATC/AFC calculations.

001-x.1 The Transmission Provider shall post on OASIS the aggregate MW value for the grandfathered agreements component of ETC associated with the ATC value posted on OASIS. The aggregate MW value shall be posted such that it can be viewed and queried using the ***systemdata*** template (see WEQ-013.3.3.1).

001-x.1.1 If the Transmission Provider has already included the MW value of a grandfathered agreement in another ETC component, the Transmission Provider should not include such value in the aggregate MW value for grandfathered agreements.

001-x.1.2 If the Transmission Provider is using the Flowgate Methodology, the Transmission Provider shall not be required to post an aggregate MW value that can be viewed and queried using the ***systemdata*** template. The Transmission Provider shall post a list of Grandfathered Agreements with MW values that are expected to be scheduled or expected to flow. This posting shall be included via a link titled "Flowgate Methodology Grandfathered Agreements" under the ATC Information Link.

001-y **Rollover Rights**

001-y.1 The Transmission Provider upon approving a Long Term Firm Point-to-Point request with rollover rights, shall post on OASIS the information relevant to the rollover rights. Such information shall be posted such that it can be viewed and queried using the ***transtatus*** and ***rollover*** templates (see WEQ-002 and WEQ-013).

001-y.2 Upon confirmation of a renewal Long Term Firm Point-to-Point request by a Transmission Customer who exercises rollover rights, the Transmission Provider shall reduce the rollover capacity in the parent reservation's ***rollover*** template by the capacity granted of the renewal reservation.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **WEQ Joint ESS/ITS and BPS Subcommittee**
Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
Request Title: **Existing Transmission Commitments**

001-y.3 Once the deadline for the Transmission Customer to submit a renewal request has passed for a Long Term Firm Point-to-Point reservation, the Transmission Provider shall set the rollover capacity to zero.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **WEQ Joint ESS/ITS and BPS Subcommittee**
Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
Request Title: **Existing Transmission Commitments**

Modifications to WEQ-001 (Changed Requirements Denoted in Red-line)

001-13.1.5 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC, that information shall be found in the CBM Implementation Document – CBMID or TRM Implementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links:

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC Methodology Contact (as required by WEQ-001-xx)
- Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5 [*"n" represents 2008 WEQ Annual Plan Item 2.b.vii]*)
- Flowgate Methodology Grandfathered Agreements (only required for Transmission Providers using the Flowgate Methodology)

The posting of this information would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns. Any section that has been redacted shall retain the heading and will include the reason for the redaction. Appropriate reasons for redaction are: "Market Sensitive Information", "CEII Information", "Security Sensitive Information" or "Reliability Sensitive Information".

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to ATC Information. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the ATC Information Link above may require the user to register with the individual OASIS sites according to WEQ-002-3.1.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

Modifications to WEQ-003 (Changed Requirements Denoted in Red-line)

WEQ-003 Data Dictionary Changes

003-0 OASIS DATA DICTIONARY, Version 1.4

Data Dictionary Element Name	Alias	Field Format : minimum characters {type of ASCII} maximum characters	Restricted Values	Definition of Data Element
SYSTEM_ATTRIBUTE	SYSATTR	0{ALPHANUMERIC}20	Valid Values: CBM FTRM NFTRM TTC FATC NFATC FGF NFGF ATC_ANNOTATION ZONE_FORECASTED_LOAD SYSTEM_FORECASTED_LOAD NATIVE_FORECASTED_LOAD ZONE_ACTUAL_LOAD SYSTEM_ACTUAL_LOAD NATIVE_ACTUAL_LOAD {Registered}	Type of system data viewed by SYSTEMDATA Template: CBM – Capacity Benefit Margin FTRM – Transmission Reliability Margin for use in FATC NFTRM – Transmission Reliability Margin for use in NFATC TTC – Total Transmission Capability FATC –Firm Available Transmission Capability NFATC – Non-firm Available Transmission Capability ATC_ANNOTATION – Annotation for a change in monthly or yearly posted ATC. FGF – Firm Grandfathered Firm Transmission Service NFGF – Non-Firm Grandfathered Non-Firm Transmission Service ZONE_FORECASTED_LOAD – Anticipated Forecasted Daily Zonal Load SYSTEM_FORECASTED_LOAD – Anticipated Forecasted Daily System-Wide Peak Load NATIVE_FORECASTED_LOAD – Anticipated portion of the Forecasted Daily System-Wide

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

003-0 OASIS DATA DICTIONARY, Version 1.4				
Data Dictionary Element Name	**Alias**	**Field Format : minimum characters {type of ASCII} maximum characters**	**Restricted Values**	**Definition of Data Element**
				Peak Load for the native load ZONE_ACTUAL_LOAD – Actual Daily Zonal Load SYSTEM_ACTUAL_LOAD – Actual Daily System-Wide Peak Load NATIVE_ACTUAL_LOAD – Actual portion of Daily System-Wide Peak Load for the native load {registered} – Provider specific registered name for the data posted

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **WEQ Joint ESS/ITS and BPS Subcommittee**
Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
Request Title: **Existing Transmission Commitments**

Modifications to WEQ-013 (Changed Requirements Denoted in Red-line)

013-3.3.1 ATC Related Query/Response Requirements

Transmission Providers shall provide applicable data associated with the following SYSTEM_ATTRIBUTE values:

- TTC – Total Transfer Capability
- CBM – Capacity Benefit Margin
- FTRM – Transmission Reliability Margin for use in FATC
- NFTRM – Transmission Reliability Margin for use in NFATC
- FATC –Firm Available Transfer Capability
- NFATC –Non-Firm Available Transfer Capability
- FGF – Firm Grandfathered Transmission Service
- NFGF – Non-Firm Grandfathered Transmission Service
- ZERO_FATC_NARRATIVE – Narrative when a posted firm monthly or yearly ATC value remains unchanged at a value of zero consistent with WEQ-001-Y
- ZERO_NFATC_NARRATIVE – Narrative when a posted non-firm monthly or yearly ATC value remains unchanged at a value of zero consistent with WEQ-001-Y
- FATC_CHANGE_NARRATIVE – Narrative when a posted firm monthly or yearly ATC changes as a result of a 10 percent change in TTC/TFC consistent with WEQ-001-Z
- NFATC_CHANGE_NARRATIVE – Narrative when a posted non-firm monthly or yearly ATC changes as a result of a 10 percent change in TTC/TFC consistent with WEQ-001-Z
- ATC_ANNOTATION – Annotation for a change in monthly or yearly posted ATC (no longer used replaced by ZERO_FATC_NARRATIVE, ZERO_NFATC_NARRATIVE, FATC_CHANGE_NARRATIVE, NFATC_CHANGE_NARRATIVE)
- {registered} – Provider defined attributes necessary for posting required data

The SYSTEM_ELEMENT_TYPE and SYSTEM_ELEMENT shall be used as follows:

- SYSTEM_ELEMENT_TYPE = PATH
- SYSTEM_ELEMENT = Name of the path associated with the posted ATC component value

Posting of ATC component data and narratives via the ***systemdata*** template shall comply with all applicable regulations and business practices.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

The following are the ***systemdata*** template Data Element requirements for providing ATC component data, i.e., TTC, CBM, FTRM, NFTRM, FATC, NFATC, FGF, or NFGF to the user:

Data Element	Restriction/Requirement
POSTING_REF	The unique OASIS identifier assigned to the posting
SYSTEM_ELEMENT_TYPE	"PATH"
SYSTEM_ELEMENT	Name of the path associated with the posted ATC component value
SYSTEM_ATTRIBUTE	"TTC", "CBM", "FTRM", "NFTRM", "FATC", "NFATC," "FGF", or "NFGF"
START_TIME	Beginning of interval associated with the posted value
STOP_TIME	End of interval associated with the posted value
ATTRIBUTE_VALUE	Value of the posted ATC component over the interval of START_TIME/STOP_TIME
ATTRIBUTE_UNITS	Units of ATTRIBUTE_VALUE; typically MW
ANNOTATION	Optional at discretion of the Provider; typically null

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

The following are the ***systemdata*** template Data Element requirements for providing a brief, but specific, narrative explanation of the reason for a change in the monthly or yearly firm or non-firm ATC value on a constrained Posted Path when the monthly or yearly ATC value changes as a result of a 10 percent or greater change in the related posted TTC or TFC.

Data Element	Restriction/Requirement
POSTING_REF	The unique OASIS identifier assigned to the posting
SYSTEM_ELEMENT_TYPE	"PATH"
SYSTEM_ELEMENT	Name of the path associated with the posted ATC component value
SYSTEM_ATTRIBUTE	"FATC_CHANGE_NARRATIVE" or "NFATC_CHANGE_NARRATIVE"

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

Data Element	Restriction/Requirement
START_TIME	Date and time that the Transmission Provider's most limiting TTC path's TTC or TFC flowgate's TFC changed consistent with the criteria specified in Z.1.1
STOP_TIME	Date and time of the end of the reason for the change in the Transmission Provider's most limiting TTC path's TTC or TFC flowgate's TFC, consistent with the criteria specified in Z.1.1, if a reasonable estimate is known at the time of the posting. . If the date and time for the end of the reason for the change is (1) unknown or is indeterminate, (2) beyond the OASIS posting horizon, or (3) the change is permanent then a null value shall be returned for STOP_TIME.
ATTRIBUTE_VALUE	The maximum change in TTC/TFC over the start /stop time interval rounded to the nearest percent (e.g., an increase of 13.7% in TTC would be posted as +14% and a decrease of 13.7% in TTC would be posted as -14%)
ATTRIBUTE_UNITS	%
ANNOTATION	Narrative text fields shall be delimited by semicolons ";" (see standard Z.2.3)

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

The following are the ***systemdata*** template Data Element requirements for providing a brief, but specific, narrative associated with yearly or monthly ATC values when either the posted firm or non-firm ATC remains unchanged at a value of zero (0) for six (6) months or longer.

Data Element	Restriction/Requirement
POSTING_REF	The unique OASIS identifier assigned to the posting
SYSTEM_ELEMENT_TYPE	"PATH"
SYSTEM_ELEMENT	Name of the path associated with the posted ATC component value

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
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Data Element	Restriction/Requirement
SYSTEM_ATTRIBUTE	"ZERO_FATC_NARRATIVE" or "ZERO_NFATC_NARRATIVE"
START_TIME	Date and time that the posted ATC initially became zero, which may be prior to the date of the zero ATC narrative posting
STOP_TIME	Date and time when the posted ATC is expected to be greater than zero. If such date and time is unknown, then a null value shall be returned for STOP_TIME.
ATTRIBUTE_VALUE	0
ATTRIBUTE_UNITS	"MW"
ANNOTATION	Narrative text fields shall be delimited by semicolons ";"(see standard Y.2.3)

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

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4. SUPPORTING DOCUMENTATION

a. Description of Request:

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions about this recommendation:

> ***Paragraph 243 -*** *To achieve greater consistency in ETC calculations and further reduce the potential for undue discrimination, the Commission adopts the NOPR proposal and directs public utilities, working through NERC and NAESB, to develop a consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses. We expect that NERC will address ETC through the MOD-001 reliability standard rather than through a separate reliability standard.[1] By using MOD-001, the ETC calculation can be adjusted to be applicable to each of the three ATC methodologies under development by NERC.*
>
> ***Paragraph 244 -*** *In order to provide specific direction to public utilities and NERC, we determine that ETC should be defined to include committed uses of the transmission system, including (1) native load commitments (including network service), (2) grandfathered transmission rights, (3) appropriate point-to-point reservations,[2] (4) rollover rights associated with long-term firm service, and (5) other uses identified through the NERC process. ETC should not be used to set aside transfer capability for any type of planning or contingency reserve, which are to be addressed through CBM and TRM.[3] In addition, in the short-term ATC calculation, all reserved but unused transfer capability (non-scheduled) shall be released as non-firm ATC.*
>
> ***Paragraph 246 -*** *We agree with NERC that some elements of ETC are candidates for business practices rather than reliability standards. Accordingly, we direct public utilities, working through NAESB, to develop business practices necessary for full implementation of the developed MOD-001 reliability standard.*

In the FERC Order 890-A under Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 dated December 28, 2007, the Commission made the following conclusions about this recommendation:

> ***Paragraph 63 -*** *The Commission also found that inclusion of all requests for transmission service in ETC would likely overstate usage of the system and understate ATC. The Commission therefore found that reservations that have the same point of receipt (POR) (generator) but different point of delivery (POD) (load), for the same time frame, should not be modeled in the ETC calculation simultaneously if their combined reserved transmission capacity exceeds the generator's nameplate capacity at the POR. The Commission directed public utilities, working through NERC, to develop requirements in MOD-001 that lay out clear instructions on how these reservations*

[1] The purpose of MOD-001 is to promote the consistent and uniform application of transfer capability calculations among the transmission system users. (NOTE: this is footnote 169)
[2] By "appropriate," we mean that reservations accounted for under ETC depend on the firmness and duration of the reservation. The specific characteristics should be developed in the reliability standard. (Note: this is footnote 170)
[3] TRM also includes such things as loop flow and parallel path flow. (Note: this is footnote 171)

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should be modeled. The Commission also concluded that some elements of ETC are candidates for business practices instead of reliability standards and directed public utilities, working through NAESB, to develop business practices necessary for full implementation of the MOD-001 reliability standard.

Paragraph 151 - *We decline to impose additional posting requirements regarding ETC uses, as requested by EPSA and Powerex. In Order No. 890, the Commission required transmission providers to make available all data used to calculate ATC for constrained paths and any system planning studies or specific network impact studies performed for customers.[4] This would include information regarding ETC uses, including grandfathered agreements, that affect ATC calculations or study results. EPSA and Powerex fail to demonstrate that it is necessary to require the posting of additional information regarding ETC uses to verify the accuracy of the transmission provider's ATC calculations. We note in response to Powerex that, if any new service taken upon expiration of a pre-Order No. 888 contract, the terms and conditions of the transmission provider's OATT would apply.[5]*

This recommendation addresses the WEQ 2008 Annual Plan Items:

2.a.iv.4 Posting of Existing Transmission Commitments (ETC)

2.a.vi.4 Posting of Existing Transmission Commitments (ETC)

*2.b.ii.1 Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard.*

The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

b. Description of Recommendation:

c. Business Purpose:

Implementation of FERC Orders 890 and 890-A.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Discussion of Scope

During the Joint ESS/ITS and BPS meetings held in Washington D.C. on May 14-16, 2008, the Joint Subcommittee reviewed the ETC Background document. The scope of the Annual Plan Item 2.b.ii.1 "… including the elements of ETC for

[4] See id. at P 348. (NOTE: this is footnote 64)
[5] See Order No. 888 at 31,655. (NOTE: this is footnote 65)

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For Quadrant: WEQ

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full implementation of the NERC MOD-001 reliability standard" was interpreted to include addressing the ETC components documented in MOD Standards MOD-028 (Area Interchange Methodology), MOD-029 (Rated System Path Methodology) and MOD-030 (Flowgate Methodology). The Joint Subcommittee reviewed each component and made the following determination:

- Network Integration Transmission Service (NITS) – The joint subcommittee decided not to address this component since NITS is currently within the scope of the ESS/ITS subcommittee and the ESS/ITS has already begun working on this area.
- Grandfathered Agreements – The joint subcommittee determined this ETC component should be within scope and has included standards in the recommendation.
- Rollover Rights – The joint subcommittee limited its scope for this ETC component to standards within WEQ-001 (Business Practices for Open Access Same-Time Information Systems (OASIS)). The joint subcommittee determined that it would not address WEQ-002 Business Practices for Open Access Same-Time Information Systems (OASIS) Standards and Communication Protocols), WEQ-003 Business Practices for Open Access Same-Time Information Systems (OASIS) Data Dictionary), and WEQ-013 Business Practices for Open Access Same-Time Information Systems (OASIS) Implementation Guide) since they are under the control of the ESS/ITS Subcommittee. The ESS/ITS has submitted recommendations that include rollover rights for these business practices, but have left the WEQ-001 changes to the Joint ESS/ITS and BPS Subcommittee.
- Point-to-Point Service – The Joint ESS/ITS and BPS determined that the requirements for point-to-point service have been documented sufficiently in the NAESB business practices such that no new business practices are required for the point-to-point service component of ETC.
- Other Services – The Joint ESS/ITS and BPS had considerable discussion on whether or not NAESB should develop requirements for documenting the Other Services component of the ETC in the ATCID, beyond what is included in the NERC MOD standards. The Joint ESS/ITS and BPS approved a motion on June 17, 2008 using a balanced vote which indicated they felt the NERC requirements appear to document sufficiently the Other Services description for inclusion in the ATCID.

At the June 13, 2008, Joint ESS/ITS and BPS Subcommittee meeting there was considerable discussion as to whether a separate ETC section should be created in WEQ-001 documenting references for all ETC components including those

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that are already addressed by the existing business pratices for point-to-point. A motion was approved using a "balanced vote" that stated:

> The joint subcommittee will enhance the summary and justification sections of the recommendation to explain why we are not documenting the point-to-point and NITS components in the recommendation and remove the heading for the ETC section with the grandfathered, rollover, and potentially the other services being stand-alone sections.

As a result of this motion, those ETC components for which new standards are being developed under this recommendation will be documented in separate sections in WEQ-001, such as Grandfathered Agreements and Rollover Rights, rather than creating a specific ETC section in WEQ-001.

Supporting Documentation:

~~NAESB will need to add appropriate links to this section.~~

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

- May 14 -16, 2008 (unavailable- DC)
- May 29, 2008 (unavailable- DC)
- June 12 -13, 2008 (unavailable- DC)
- June 17-18, 2008 (unavailable)- DC)

Please review the Motions Document:

- ETC Motions Document

Please review the other interim work products developed by the Joint BPS and ESS/ITS Subcommittee including the:

- ETC Background Document
- ETC Concepts
- ETC Grandfathered Component
- ETC Rollover Rights Component
- ETC Other Services Component

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **WEQ Joint ESS/ITS and BPS Subcommittee**
Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
Request Title: **Existing Transmission Commitments**

Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 890, our subcommittees have accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one balloting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **WEQ Joint ESS/ITS and BPS Subcommittee**
Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
Request Title: **Existing Transmission Commitments**

1. RECOMMENDED ACTION:

___Accept as requested
__X Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

_X__Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
__X Modification	_X_Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The recommendation is intended to address the NAESB Existing Transmission Commitments requirements in FERC Order 890 under Docket numbers RM05-17 and RM05-25 in paragraphs 243, 244, and 246 and in FERC Order 890-A under Docket number RM05-17 and RM05-25 in paragraphs 63 and 151.

This recommendation addresses the WEQ 2008 Annual Plan Items:

2.a.iv.4 Posting of Existing Transmission Commitments (ETC)

2.a.vi.4 Posting of Existing Transmission Commitments (ETC)

2.b.ii.1 Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **WEQ Joint ESS/ITS and BPS Subcommittee**
Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
Request Title: **Existing Transmission Commitments**

The business practices developed to address this item will require coordination with the NERC Order 890 reliability standards development.

The Joint ESS/ITS and BPS Subcommittee reviewed the NERC MOD Standards MOD-028 (Area Interchange Methodology), MOD-029 (Rated System Path Methodology) and MOD-030 (Flowgate Methodology) and determined that scope of this recommendation would be limited to those ETC components, which they agreed were not addressed adequately in the existing standards or included in the scope of work assigned to the ESS/ITS Subcommittee. As a result of this decision the scope of the recommendation has been limited to the Grandfathered Agreement and Rollover Rights components of the ETC. There will not be a separate section for ETC.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

RECOMMENDED STANDARDS:

Modifications to WEQ-001 (New Requirements)

Business Practice Standards for Posting the ETC Components

NOTE: NAESB Staff will assign appropriate enumeration to this standard to replace "x" and "y" with next sequential standard number within WEQ-001

001-x **Grandfathered Agreements**

The Transmission Provider shall identify in the ATCID the treatment of grandfathered agreements in the ATC/AFC calculations.

001-x.1 The Transmission Provider shall post on OASIS the aggregate MW value for the grandfathered agreements component of ETC associated with the ATC value posted on OASIS. The aggregate MW value shall be posted such that it can be viewed and queried using the ***systemdata*** template (see WEQ-013.3.3.1).

001-x.1.1 If the Transmission Provider has already included the MW value of a grandfathered agreement in another ETC component, the Transmission Provider should not include such value in the aggregate MW value for grandfathered agreements.

001-x.1.2 If the Transmission Provider is using the Flowgate Methodology, the Transmission Provider shall not be required to post an aggregate MW value that can be viewed and queried using the ***systemdata*** template. The Transmission Provider shall post a list of Grandfathered Agreements with MW values that are expected to be scheduled or expected to flow. This posting shall be included via a link titled "Flowgate Methodology Grandfathered Agreements" under the ATC Information Link.

001-y **Rollover Rights**

001-y.1 The Transmission Provider upon approving a Long Term Firm Point-to-Point request with rollover rights, shall post on OASIS the information relevant to the rollover rights. Such information shall be posted such that it can be viewed and queried using the ***transtatus*** and ***rollover*** templates (see WEQ-002 and WEQ-013).

001-y.2 Upon confirmation of a renewal Long Term Firm Point-to-Point request by a Transmission Customer who exercises rollover rights, the Transmission

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Provider shall reduce the rollover capacity in the parent reservation's ***rollover*** template by the capacity granted of the renewal reservation.

001-y.3 Once the deadline for the Transmission Customer to submit a renewal request has passed for a Long Term Firm Point-to-Point reservation, the Transmission Provider shall set the rollover capacity to zero.

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Request Title: **Existing Transmission Commitments**

Modifications to WEQ-001 (Changed Requirements Denoted in Red-line)

001-13.1.5 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC, that information shall be found in the CBM Implementation Document – CBMID or TRM Implementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links:

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC Methodology Contact (as required by WEQ-001-xx)
- Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5 [*"n" represents 2008 WEQ Annual Plan Item 2.b.vii]*)
- Flowgate Methodology Grandfathered Agreements (only required for Transmission Providers using the Flowgate Methodology)

The posting of this information would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns. Any section that has been redacted shall retain the heading and will include the reason for the redaction. Appropriate reasons for redaction are: "Market Sensitive Information", "CEII Information", "Security Sensitive Information" or "Reliability Sensitive Information".

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to ATC Information. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the ATC Information Link above may require the user to register with the individual OASIS sites according to WEQ-002-3.1.

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Request Title: Existing Transmission Commitments

Modifications to WEQ-003 (Changed Requirements Denoted in Red-line)

WEQ-003 Data Dictionary Changes

003-0 OASIS DATA DICTIONARY, Version 1.4				
Data Dictionary Element Name	**Alias**	**Field Format : minimum characters {type of ASCII} maximum characters**	**Restricted Values**	**Definition of Data Element**
SYSTEM_ATTRIBUTE	SYSATTR	0{ALPHANUMERIC}20	Valid Values: CBM FTRM NFTRM TTC FATC NFATC FGF NFGF ATC_ANNOTATION ZONE_FORECASTED_LOAD SYSTEM_FORECASTED_LOAD NATIVE_FORECASTED_LOAD ZONE_ACTUAL_LOAD SYSTEM_ACTUAL_LOAD NATIVE_ACTUAL_LOAD {Registered}	Type of system data viewed by SYSTEMDATA Template: CBM – Capacity Benefit Margin FTRM – Transmission Reliability Margin for use in FATC NFTRM – Transmission Reliability Margin for use in NFATC TTC – Total Transmission Capability FATC –Firm Available Transmission Capability NFATC – Non-firm Available Transmission Capability ATC_ANNOTATION – Annotation for a change in monthly or yearly posted ATC. FGF – Firm Grandfathered Firm Transmission Service NFGF – Non-Firm Grandfathered Non-Firm Transmission Service ZONE_FORECASTED_LOAD – Anticipated Forecasted Daily Zonal Load SYSTEM_FORECASTED_LOAD – Anticipated Forecasted Daily System-Wide Peak Load NATIVE_FORECASTED_LOAD – Anticipated portion of the Forecasted Daily System-Wide

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003-0 OASIS DATA DICTIONARY, Version 1.4				
Data Dictionary Element Name	**Alias**	**Field Format : minimum characters {type of ASCII} maximum characters**	**Restricted Values**	**Definition of Data Element**
				Peak Load for the native load ZONE_ACTUAL_LOAD – Actual Daily Zonal Load SYSTEM_ACTUAL_LOAD – Actual Daily System-Wide Peak Load NATIVE_ACTUAL_LOAD – Actual portion of Daily System-Wide Peak Load for the native load {registered} – Provider specific registered name for the data posted

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Request Title: **Existing Transmission Commitments**

Modifications to WEQ-013 (Changed Requirements Denoted in Red-line)

013-3.3.1 ATC Related Query/Response Requirements

Transmission Providers shall provide applicable data associated with the following SYSTEM_ATTRIBUTE values:

- TTC – Total Transfer Capability
- CBM – Capacity Benefit Margin
- FTRM – Transmission Reliability Margin for use in FATC
- NFTRM – Transmission Reliability Margin for use in NFATC
- FATC –Firm Available Transfer Capability
- NFATC –Non-Firm Available Transfer Capability
- FGF – Firm Grandfathered Transmission Service
- NFGF – Non-Firm Grandfathered Transmission Service
- ZERO_FATC_NARRATIVE – Narrative when a posted firm monthly or yearly ATC value remains unchanged at a value of zero consistent with WEQ-001-Y
- ZERO_NFATC_NARRATIVE – Narrative when a posted non-firm monthly or yearly ATC value remains unchanged at a value of zero consistent with WEQ-001-Y
- FATC_CHANGE_NARRATIVE – Narrative when a posted firm monthly or yearly ATC changes as a result of a 10 percent change in TTC/TFC consistent with WEQ-001-Z
- NFATC_CHANGE_NARRATIVE – Narrative when a posted non-firm monthly or yearly ATC changes as a result of a 10 percent change in TTC/TFC consistent with WEQ-001-Z
- ATC_ANNOTATION – Annotation for a change in monthly or yearly posted ATC (no longer used replaced by ZERO_FATC_NARRATIVE, ZERO_NFATC_NARRATIVE, FATC_CHANGE_NARRATIVE, NFATC_CHANGE_NARRATIVE)
- {registered} – Provider defined attributes necessary for posting required data

The SYSTEM_ELEMENT_TYPE and SYSTEM_ELEMENT shall be used as follows:

- SYSTEM_ELEMENT_TYPE = PATH
- SYSTEM_ELEMENT = Name of the path associated with the posted ATC component value

Posting of ATC component data and narratives via the ***systemdata*** template shall comply with all applicable regulations and business practices.

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The following are the ***systemdata*** template Data Element requirements for providing ATC component data, i.e., TTC, CBM, FTRM, NFTRM, FATC, NFATC, FGF, or NFGF to the user:

Data Element	Restriction/Requirement
POSTING_REF	The unique OASIS identifier assigned to the posting
SYSTEM_ELEMENT_TYPE	"PATH"
SYSTEM_ELEMENT	Name of the path associated with the posted ATC component value
SYSTEM_ATTRIBUTE	"TTC", "CBM", "FTRM", "NFTRM", "FATC", "NFATC," "FGF", or "NFGF"
START_TIME	Beginning of interval associated with the posted value
STOP_TIME	End of interval associated with the posted value
ATTRIBUTE_VALUE	Value of the posted ATC component over the interval of START_TIME/STOP_TIME
ATTRIBUTE_UNITS	Units of ATTRIBUTE_VALUE; typically MW
ANNOTATION	Optional at discretion of the Provider; typically null

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

The following are the ***systemdata*** template Data Element requirements for providing a brief, but specific, narrative explanation of the reason for a change in the monthly or yearly firm or non-firm ATC value on a constrained Posted Path when the monthly or yearly ATC value changes as a result of a 10 percent or greater change in the related posted TTC or TFC.

Data Element	Restriction/Requirement
POSTING_REF	The unique OASIS identifier assigned to the posting
SYSTEM_ELEMENT_TYPE	"PATH"
SYSTEM_ELEMENT	Name of the path associated with the posted ATC component value
SYSTEM_ATTRIBUTE	"FATC_CHANGE_NARRATIVE" or "NFATC_CHANGE_NARRATIVE"

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Data Element	Restriction/Requirement
START_TIME	Date and time that the Transmission Provider's most limiting TTC path's TTC or TFC flowgate's TFC changed consistent with the criteria specified in Z.1.1
STOP_TIME	Date and time of the end of the reason for the change in the Transmission Provider's most limiting TTC path's TTC or TFC flowgate's TFC, consistent with the criteria specified in Z.1.1, if a reasonable estimate is known at the time of the posting. . If the date and time for the end of the reason for the change is (1) unknown or is indeterminate, (2) beyond the OASIS posting horizon, or (3) the change is permanent then a null value shall be returned for STOP_TIME.
ATTRIBUTE_VALUE	The maximum change in TTC/TFC over the start /stop time interval rounded to the nearest percent (e.g., an increase of 13.7% in TTC would be posted as +14% and a decrease of 13.7% in TTC would be posted as -14%)
ATTRIBUTE_UNITS	%
ANNOTATION	Narrative text fields shall be delimited by semicolons ";" (see standard Z.2.3)

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

The following are the ***systemdata*** template Data Element requirements for providing a brief, but specific, narrative associated with yearly or monthly ATC values when either the posted firm or non-firm ATC remains unchanged at a value of zero (0) for six (6) months or longer.

Data Element	Restriction/Requirement
POSTING_REF	The unique OASIS identifier assigned to the posting
SYSTEM_ELEMENT_TYPE	"PATH"
SYSTEM_ELEMENT	Name of the path associated with the posted ATC component value

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

Data Element	Restriction/Requirement
SYSTEM_ATTRIBUTE	"ZERO_FATC_NARRATIVE" or "ZERO_NFATC_NARRATIVE"
START_TIME	Date and time that the posted ATC initially became zero, which may be prior to the date of the zero ATC narrative posting
STOP_TIME	Date and time when the posted ATC is expected to be greater than zero. If such date and time is unknown, then a null value shall be returned for STOP_TIME.
ATTRIBUTE_VALUE	0
ATTRIBUTE_UNITS	"MW"
ANNOTATION	Narrative text fields shall be delimited by semicolons ";"(see standard Y.2.3)

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

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Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
Request Title: **Existing Transmission Commitments**

4. SUPPORTING DOCUMENTATION

a. Description of Request:

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions about this recommendation:

> ***Paragraph 243 -*** *To achieve greater consistency in ETC calculations and further reduce the potential for undue discrimination, the Commission adopts the NOPR proposal and directs public utilities, working through NERC and NAESB, to develop a consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses. We expect that NERC will address ETC through the MOD-001 reliability standard rather than through a separate reliability standard.[1] By using MOD-001, the ETC calculation can be adjusted to be applicable to each of the three ATC methodologies under development by NERC.*
>
> ***Paragraph 244 -*** *In order to provide specific direction to public utilities and NERC, we determine that ETC should be defined to include committed uses of the transmission system, including (1) native load commitments (including network service), (2) grandfathered transmission rights, (3) appropriate point-to-point reservations,[2] (4) rollover rights associated with long-term firm service, and (5) other uses identified through the NERC process. ETC should not be used to set aside transfer capability for any type of planning or contingency reserve, which are to be addressed through CBM and TRM.[3] In addition, in the short-term ATC calculation, all reserved but unused transfer capability (non-scheduled) shall be released as non-firm ATC.*
>
> ***Paragraph 246 -*** *We agree with NERC that some elements of ETC are candidates for business practices rather than reliability standards. Accordingly, we direct public utilities, working through NAESB, to develop business practices necessary for full implementation of the developed MOD-001 reliability standard.*

In the FERC Order 890-A under Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 dated December 28, 2007, the Commission made the following conclusions about this recommendation:

> ***Paragraph 63 -*** *The Commission also found that inclusion of all requests for transmission service in ETC would likely overstate usage of the system and understate ATC. The Commission therefore found that reservations that have the same point of receipt (POR) (generator) but different point of delivery (POD) (load), for the same time frame, should not be modeled in the ETC calculation simultaneously if their combined reserved transmission capacity exceeds the generator's nameplate capacity at the POR. The Commission directed public utilities, working through NERC, to develop requirements in*

[1] The purpose of MOD-001 is to promote the consistent and uniform application of transfer capability calculations among the transmission system users. (NOTE: this is footnote 169)
[2] By "appropriate," we mean that reservations accounted for under ETC depend on the firmness and duration of the reservation. The specific characteristics should be developed in the reliability standard. (Note: this is footnote 170)
[3] TRM also includes such things as loop flow and parallel path flow. (Note: this is footnote 171)

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MOD-001 that lay out clear instructions on how these reservations should be modeled. The Commission also concluded that some elements of ETC are candidates for business practices instead of reliability standards and directed public utilities, working through NAESB, to develop business practices necessary for full implementation of the MOD-001 reliability standard.

***Paragraph 151 -** We decline to impose additional posting requirements regarding ETC uses, as requested by EPSA and Powerex. In Order No. 890, the Commission required transmission providers to make available all data used to calculate ATC for constrained paths and any system planning studies or specific network impact studies performed for customers.[4] This would include information regarding ETC uses, including grandfathered agreements, that affect ATC calculations or study results. EPSA and Powerex fail to demonstrate that it is necessary to require the posting of additional information regarding ETC uses to verify the accuracy of the transmission provider's ATC calculations. We note in response to Powerex that, if any new service taken upon expiration of a pre-Order No. 888 contract, the terms and conditions of the transmission provider's OATT would apply.[5]*

This recommendation addresses the WEQ 2008 Annual Plan Items:

2.a.iv.4 Posting of Existing Transmission Commitments (ETC)

2.a.vi.4 Posting of Existing Transmission Commitments (ETC)

*2.b.ii.1 Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard.*

The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

b. Description of Recommendation:

c. Business Purpose:

Implementation of FERC Orders 890 and 890-A.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Discussion of Scope

During the Joint ESS/ITS and BPS meetings held in Washington D.C. on May 14-16, 2008, the Joint Subcommittee reviewed the ETC Background document. The scope of the Annual Plan Item 2.b.ii.1 "… including the elements of ETC for

[4] See id. at P 348. (NOTE: this is footnote 64)
[5] See Order No. 888 at 31,655. (NOTE: this is footnote 65)

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
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full implementation of the NERC MOD-001 reliability standard" was interpreted to include addressing the ETC components documented in MOD Standards MOD-028 (Area Interchange Methodology), MOD-029 (Rated System Path Methodology) and MOD-030 (Flowgate Methodology). The Joint Subcommittee reviewed each component and made the following determination:

- Network Integration Transmission Service (NITS) – The joint subcommittee decided not to address this component since NITS is currently within the scope of the ESS/ITS subcommittee and the ESS/ITS has already begun working on this area.
- Grandfathered Agreements – The joint subcommittee determined this ETC component should be within scope and has included standards in the recommendation.
- Rollover Rights – The joint subcommittee limited its scope for this ETC component to standards within WEQ-001 (Business Practices for Open Access Same-Time Information Systems (OASIS)). The joint subcommittee determined that it would not address WEQ-002 Business Practices for Open Access Same-Time Information Systems (OASIS) Standards and Communication Protocols), WEQ-003 Business Practices for Open Access Same-Time Information Systems (OASIS) Data Dictionary), and WEQ-013 Business Practices for Open Access Same-Time Information Systems (OASIS) Implementation Guide) since they are under the control of the ESS/ITS Subcommittee. The ESS/ITS has submitted recommendations that include rollover rights for these business practices, but have left the WEQ-001 changes to the Joint ESS/ITS and BPS Subcommittee.
- Point-to-Point Service – The Joint ESS/ITS and BPS determined that the requirements for point-to-point service have been documented sufficiently in the NAESB business practices such that no new business practices are required for the point-to-point service component of ETC.
- Other Services – The Joint ESS/ITS and BPS had considerable discussion on whether or not NAESB should develop requirements for documenting the Other Services component of the ETC in the ATCID, beyond what is included in the NERC MOD standards. The Joint ESS/ITS and BPS approved a motion on June 17, 2008 using a balanced vote which indicated they felt the NERC requirements appear to document sufficiently the Other Services description for inclusion in the ATCID.

At the June 13, 2008, Joint ESS/ITS and BPS Subcommittee meeting there was considerable discussion as to whether a separate ETC section should be created in WEQ-001 documenting references for all ETC components including those

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Request Title:	**Existing Transmission Commitments**

that are already addressed by the existing business pratices for point-to-point. A motion was approved using a "balanced vote" that stated:

> The joint subcommittee will enhance the summary and justification sections of the recommendation to explain why we are not documenting the point-to-point and NITS components in the recommendation and remove the heading for the ETC section with the grandfathered, rollover, and potentially the other services being stand-alone sections.

As a result of this motion, those ETC components for which new standards are being developed under this recommendation will be documented in separate sections in WEQ-001, such as Grandfathered Agreements and Rollover Rights, rather than creating a specific ETC section in WEQ-001.

Supporting Documentation:

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

- May 14 -16, 2008 (unavailable- DC)
- May 29, 2008 (unavailable- DC)
- June 12 -13, 2008 (unavailable- DC)
- June 17-18, 2008 (unavailable- DC)

Please review the Motions Document:

- ETC Motions Document

Please review the other interim work products developed by the Joint BPS and ESS/ITS Subcommittee including the:

- ETC Background Document
- ETC Concepts
- ETC Grandfathered Component
- ETC Rollover Rights Component
- ETC Other Services Component

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **WEQ Joint ESS/ITS and BPS Subcommittee**
Request No.: **2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1**
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BPA Formal Comments on ETC

Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 890, our subcommittees have accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one balloting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
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BPA Formal Comments on ETC

1. RECOMMENDED ACTION:

___Accept as requested
__X Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

__X__Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___Initiation
__X Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

Per Recommendation:

___Initiation
_X_Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The recommendation is intended to address the NAESB Existing Transmission Commitments requirements in FERC Order 890 under Docket numbers RM05-17 and RM05-25 in paragraphs 243, 244, and 246 and in FERC Order 890-A under Docket number RM05-17 and RM05-25 in paragraphs 63 and 151.

This recommendation addresses the WEQ 2008 Annual Plan Items:

2.a.iv.4 Posting of Existing Transmission Commitments (ETC)

2.a.vi.4 Posting of Existing Transmission Commitments (ETC)

2.b.ii.1 Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

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BPA Formal Comments on ETC

The business practices developed to address this item will require coordination with the NERC Order 890 reliability standards development.

The Joint ESS/ITS and BPS Subcommittee reviewed the NERC MOD Standards MOD-028 (Area Interchange Methodology), MOD-029 (Rated System Path Methodology) and MOD-030 (Flowgate Methodology) and determined that scope of this recommendation would be limited to those ETC components, which they agreed were not addressed adequately in the existing standards or included in the scope of work assigned to the ESS/ITS Subcommittee. As a result of this decision the scope of the recommendation has been limited to the Grandfathered Agreement and Rollover Rights components of the ETC. There will not be a separate section for ETC.

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BPA Formal Comments on ETC

RECOMMENDED STANDARDS:

Modifications to WEQ-001 (New Requirements)

Business Practice Standards for Posting the ETC Components

NOTE: NAESB Staff will assign appropriate enumeration to this standard to replace "x" and "y" with next sequential standard number within WEQ-001

001-x Grandfathered Agreements

The Transmission Provider shall identify in the ATCID the treatment of grandfathered agreements in the ATC/AFC calculations.

001-x.1 The Transmission Provider shall post on OASIS the aggregate MW value for the grandfathered agreements component of ETC associated with the ATC value posted on OASIS. The aggregate MW value shall be posted such that it can be viewed and queried using the ***systemdata*** template (see WEQ-013.3.3.1).

001-x.1.1 If the Transmission Provider has already included the MW value of a grandfathered agreement in another ETC component, the Transmission Provider should not include such value in the aggregate MW value for grandfathered agreements.

001-x.1.1.1 If the Transmission Provider has not included the MW value of a grandfathered agreement in the aggregate MW value for grandfathered agreements, then the Transmission Provider shall also identify in the ATCID how such MW value is accounted for.

001-x.1.2 ~~If the~~ Transmission Provider~~s is~~ using the Flowgate Methodology~~, the Transmission Provider~~ shall not be required to post an aggregate MW value for the grandfathered agreements component of ETC ~~that can be viewed and queried using the ***systemdata*** template~~. ~~The Transmission Provider shall post a list of Grandfathered Agreements with MW values that are expected to be scheduled or expected to flow. This posting shall be included via a link titled "Flowgate Methodology Grandfathered Agreements" under the ATC Information Link.~~

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001-x.1.2.1 Such Transmission Providers shall instead post a list of grandfathered agreements, and associated MW values that are expected to be scheduled or expected to flow, under the link entitled "Flowgate Methodology Grandfathered Agreements" listed under the ATC Information Link, according to WEQ-001-13.1.5.

001-y **Rollover Rights**

001-y.1 The Transmission Provider upon approving a Long Term Firm Point-to-Point request with rollover rights, shall post on OASIS the information relevant to the rollover rights. Such information shall be posted such that it can be viewed and queried using the ***transtatus*** and ***rollover*** templates (see WEQ-002 and WEQ-013).

001-y.2 Upon confirmation of a renewal Long Term Firm Point-to-Point request by a Transmission Customer who exercises rollover rights, the Transmission Provider shall reduce the rollover capacity in the parent reservation's ***rollover*** template by the capacity granted of the renewal reservation.

001-y.3 Once the deadline for the Transmission Customer to submit a renewal request has passed for a Long Term Firm Point-to-Point reservation, the Transmission Provider shall set the rollover capacity to zero.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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BPA Formal Comments on ETC

Modifications to WEQ-001 (Changed Requirements Denoted in Red-line)

001-13.1.5 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC or AFC, that information shall be found in the CBM Implementation Document – CBMID or TRM Implementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links:

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC or AFC Methodology Contact (as required by WEQ-001-xx)
- Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5 [*"n" represents 2008 WEQ Annual Plan Item 2.b.vii]*)
- Flowgate Methodology Grandfathered Agreements (only required for Transmission Providers using the Flowgate Methodology)

The posting of this information would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns. Any section that has been redacted shall retain the heading and will include the reason for the redaction. Appropriate reasons for redaction are: "Market Sensitive Information", "CEII Information", "Security Sensitive Information" or "Reliability Sensitive Information".

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to ATC Information. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the ATC Information Link above may require the user to register with the individual OASIS sites according to WEQ-002-3.1.

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BPA Formal Comments on ETC

Modifications to WEQ-003 (Changed Requirements Denoted in Red-line)

WEQ-003 Data Dictionary Changes

003-0 OASIS DATA DICTIONARY, Version 1.4

Data Dictionary Element Name	Alias	Field Format : minimum characters {type of ASCII} maximum characters	Restricted Values	Definition of Data Element
SYSTEM_ATTRIBUTE	SYSATTR	0{ALPHANUMERIC}20	Valid Values: CBM FTRM NFTRM TTC TFC FATC FAFC NFATC NFAFC ~~F~~GF ~~NF~~GNF ATC_ANNOTATION ZONE_FORECASTED_LOAD SYSTEM_FORECASTED_LOAD NATIVE_FORECASTED_LOAD ZONE_ACTUAL_LOAD SYSTEM_ACTUAL_LOAD NATIVE_ACTUAL_LOAD	Type of system data viewed by SYSTEMDATA Template: CBM – Capacity Benefit Margin FTRM – Transmission Reliability Margin for use in FATC NFTRM – Transmission Reliability Margin for use in NFATC TTC – Total Transmission Capability TFC – Total Flowgate Capability FATC –Firm Available Transmission Capability FAFC – Firm Available Flowgate Capability NFATC – Non-firm Available Transmission Capability NFAFC – Non-firm Available Flowgate Capability ATC_ANNOTATION – Annotation for a change in monthly or yearly posted ATC. ~~F~~GF – ~~Firm~~ Grandfathered Firm Transmission Service ~~NF~~GNF – ~~Non-Firm~~ Grandfathered Non-Firm Transmission Service ZONE_FORECASTED_LOAD – Anticipated Forecasted Daily Zonal Load SYSTEM_FORECASTED_LOAD – Anticipated

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BPA Formal Comments on ETC

003-0 OASIS DATA DICTIONARY, Version 1.4

Data Dictionary Element Name	Alias	Field Format : minimum characters {type of ASCII} maximum characters	Restricted Values	Definition of Data Element
			{Registered}	Forecasted Daily System-Wide Peak Load NATIVE_FORECASTED_LOAD – Anticipated portion of the Forecasted Daily System-Wide Peak Load for the native load ZONE_ACTUAL_LOAD – Actual Daily Zonal Load SYSTEM_ACTUAL_LOAD – Actual Daily System-Wide Peak Load NATIVE_ACTUAL_LOAD – Actual portion of Daily System-Wide Peak Load for the native load {registered} – Provider specific registered name for the data posted

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BPA Formal Comments on ETC

Modifications to WEQ-013 (Changed Requirements Denoted in Red-line)

013-3.3.1 ATC Related Query/Response Requirements

Transmission Providers shall provide applicable data associated with the following SYSTEM_ATTRIBUTE values:

- TTC – Total Transfer Capability
- TFC – Total Transfer Capability
- CBM – Capacity Benefit Margin
- FTRM – Transmission Reliability Margin for use in FATC
- NFTRM – Transmission Reliability Margin for use in NFATC
- FATC –Firm Available Transfer Capability
- FAFC – Firm Available Flowgate Capability
- NFATC –Non-Firm Available Transfer Capability
- NFAFC – Non-firm Available Flowgate Capability
- ~~F~~GF – ~~Firm~~ Grandfathered Firm Transmission Service
- ~~NF~~GNF – ~~Non-Firm~~ Grandfathered ~~-~~Non-Firm Transmission Service
- ZERO_FATC_NARRATIVE – Narrative when a posted firm monthly or yearly ATC value remains unchanged at a value of zero consistent with WEQ-001-Y
- ZERO_NFATC_NARRATIVE – Narrative when a posted non-firm monthly or yearly ATC/AFC value remains unchanged at a value of zero consistent with WEQ-001-Y
- FATC_CHANGE_NARRATIVE – Narrative when a posted firm monthly or yearly ATC/AFC changes as a result of a 10 percent change in TTC/TFC consistent with WEQ-001-Z
- NFATC_CHANGE_NARRATIVE – Narrative when a posted non-firm monthly or yearly ATC/AFC changes as a result of a 10 percent change in TTC/TFC consistent with WEQ-001-Z
- ATC_ANNOTATION – Annotation for a change in monthly or yearly posted ATC (no longer used replaced by ZERO_FATC_NARRATIVE, ZERO_NFATC_NARRATIVE, FATC_CHANGE_NARRATIVE, NFATC_CHANGE_NARRATIVE)
- {registered} – Provider defined attributes necessary for posting required data

The SYSTEM_ELEMENT_TYPE and SYSTEM_ELEMENT shall be used as follows:

- SYSTEM_ELEMENT_TYPE = PATH or FLOWGATE
- SYSTEM_ELEMENT = Name of the path or flowgate associated with the posted ATC component value

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For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
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BPA Formal Comments on ETC

Posting of ATC component data and narratives via the ***systemdata*** template shall comply with all applicable regulations and business practices.

The following are the ***systemdata*** template Data Element requirements for providing ATC component data, i.e., TTC, TFC, CBM, FTRM, NFTRM, FATC, FAFC, NFATC, NFAFC, ~~F~~GF, or ~~NF~~GNF to the user:

Data Element	Restriction/Requirement
POSTING_REF	The unique OASIS identifier assigned to the posting
SYSTEM_ELEMENT_TYPE	"PATH" or "FLOWGATE"
SYSTEM_ELEMENT	Name of the path associated with the posted ATC component value
SYSTEM_ATTRIBUTE	"TTC", "CBM", "FTRM", "NFTRM", "FATC", "FAFC", "NFATC," "NFAFC", "~~F~~GF", or "~~NF~~GNF"
START_TIME	Beginning of interval associated with the posted value
STOP_TIME	End of interval associated with the posted value
ATTRIBUTE_VALUE	Value of the posted ATC/AFC component over the interval of START_TIME/STOP_TIME
ATTRIBUTE_UNITS	Units of ATTRIBUTE_VALUE; typically MW
ANNOTATION	Optional at discretion of the Provider; typically null

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

The following are the ***systemdata*** template Data Element requirements for providing a brief, but specific, narrative explanation of the reason for a change in the monthly or yearly firm or non-firm ATC or AFC value on a constrained Posted Path when the monthly or yearly ATC or AFC value changes as a result of a 10 percent or greater change in the related posted TTC or TFC.

Data Element	Restriction/Requirement
POSTING_REF	The unique OASIS identifier assigned to the posting
SYSTEM_ELEMENT_TYPE	"PATH" or "FLOWGATE"

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BPA Formal Comments on ETC

Data Element	Restriction/Requirement
SYSTEM_ELEMENT	Name of the path or flowgate associated with the posted ATC component value
SYSTEM_ATTRIBUTE	"FATC_CHANGE_NARRATIVE" or "NFATC_CHANGE_NARRATIVE"
START_TIME	Date and time that the Transmission Provider's most limiting TTC path's TTC or TFC flowgate's TFC changed consistent with the criteria specified in Z.1.1
STOP_TIME	Date and time of the end of the reason for the change in the Transmission Provider's most limiting TTC path's TTC or TFC flowgate's TFC, consistent with the criteria specified in Z.1.1, if a reasonable estimate is known at the time of the posting. . If the date and time for the end of the reason for the change is (1) unknown or is indeterminate, (2) beyond the OASIS posting horizon, or (3) the change is permanent then a null value shall be returned for STOP_TIME.
ATTRIBUTE_VALUE	The maximum change in TTC/TFC over the start /stop time interval rounded to the nearest percent (e.g., an increase of 13.7% in TTC would be posted as +14% and a decrease of 13.7% in TTC would be posted as -14%)
ATTRIBUTE_UNITS	%
ANNOTATION	Narrative text fields shall be delimited by semicolons ";" (see standard Z.2.3)

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

The following are the ***systemdata*** template Data Element requirements for providing a brief, but specific, narrative associated with yearly or monthly ATC/AFC values when either the posted firm or non-firm ATC/AFC remains unchanged at a value of zero (0) for six (6) months or longer.

Data Element	Restriction/Requirement
POSTING_REF	The unique OASIS identifier assigned to the posting

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

BPA Formal Comments on ETC

Data Element	Restriction/Requirement
SYSTEM_ELEMENT_TYPE	"PATH" or "FLOWGATE"
SYSTEM_ELEMENT	Name of the path associated with the posted ATC component value
SYSTEM_ATTRIBUTE	"ZERO_FATC_NARRATIVE" or "ZERO_NFATC_NARRATIVE"
START_TIME	Date and time that the posted ATC/AFC initially became zero, which may be prior to the date of the zero ATC/AFC narrative posting
STOP_TIME	Date and time when the posted ATC/AFC is expected to be greater than zero. If such date and time is unknown, then a null value shall be returned for STOP_TIME.
ATTRIBUTE_VALUE	0
ATTRIBUTE_UNITS	"MW"
ANNOTATION	Narrative text fields shall be delimited by semicolons ";"(see standard Y.2.3)

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

BPA Formal Comments on ETC

4. SUPPORTING DOCUMENTATION

a. Description of Request:

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions about this recommendation:

> ***Paragraph 243 -*** *To achieve greater consistency in ETC calculations and further reduce the potential for undue discrimination, the Commission adopts the NOPR proposal and directs public utilities, working through NERC and NAESB, to develop a consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses. We expect that NERC will address ETC through the MOD-001 reliability standard rather than through a separate reliability standard.[1] By using MOD-001, the ETC calculation can be adjusted to be applicable to each of the three ATC methodologies under development by NERC.*
>
> ***Paragraph 244 -*** *In order to provide specific direction to public utilities and NERC, we determine that ETC should be defined to include committed uses of the transmission system, including (1) native load commitments (including network service), (2) grandfathered transmission rights, (3) appropriate point-to-point reservations,[2] (4) rollover rights associated with long-term firm service, and (5) other uses identified through the NERC process. ETC should not be used to set aside transfer capability for any type of planning or contingency reserve, which are to be addressed through CBM and TRM.[3] In addition, in the short-term ATC calculation, all reserved but unused transfer capability (non-scheduled) shall be released as non-firm ATC.*
>
> ***Paragraph 246 -*** *We agree with NERC that some elements of ETC are candidates for business practices rather than reliability standards. Accordingly, we direct public utilities, working through NAESB, to develop business practices necessary for full implementation of the developed MOD-001 reliability standard.*

In the FERC Order 890-A under Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 dated December 28, 2007, the Commission made the following conclusions about this recommendation:

> ***Paragraph 63 -*** *The Commission also found that inclusion of all requests for transmission service in ETC would likely overstate usage of the system and understate ATC. The Commission therefore found that reservations that have the same point of receipt (POR) (generator) but different point of delivery (POD) (load), for the same time frame, should not be modeled in the ETC calculation simultaneously if their combined reserved transmission capacity exceeds the generator's nameplate capacity at the POR. The Commission directed public utilities, working through NERC, to develop requirements in MOD-001 that lay out clear instructions on how these reservations*

[1] The purpose of MOD-001 is to promote the consistent and uniform application of transfer capability calculations among the transmission system users. (NOTE: this is footnote 169)
[2] By "appropriate," we mean that reservations accounted for under ETC depend on the firmness and duration of the reservation. The specific characteristics should be developed in the reliability standard. (Note: this is footnote 170)
[3] TRM also includes such things as loop flow and parallel path flow. (Note: this is footnote 171)

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

BPA Formal Comments on ETC

should be modeled. The Commission also concluded that some elements of ETC are candidates for business practices instead of reliability standards and directed public utilities, working through NAESB, to develop business practices necessary for full implementation of the MOD-001 reliability standard.

***Paragraph 151 -** We decline to impose additional posting requirements regarding ETC uses, as requested by EPSA and Powerex. In Order No. 890, the Commission required transmission providers to make available all data used to calculate ATC for constrained paths and any system planning studies or specific network impact studies performed for customers.[4] This would include information regarding ETC uses, including grandfathered agreements, that affect ATC calculations or study results. EPSA and Powerex fail to demonstrate that it is necessary to require the posting of additional information regarding ETC uses to verify the accuracy of the transmission provider's ATC calculations. We note in response to Powerex that, if any new service taken upon expiration of a pre-Order No. 888 contract, the terms and conditions of the transmission provider's OATT would apply.[5]*

This recommendation addresses the WEQ 2008 Annual Plan Items:

2.a.iv.4 Posting of Existing Transmission Commitments (ETC)

2.a.vi.4 Posting of Existing Transmission Commitments (ETC)

*2.b.ii.1 Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard.*

The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

b. Description of Recommendation:

c. Business Purpose:

Implementation of FERC Orders 890 and 890-A.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Discussion of Scope

During the Joint ESS/ITS and BPS meetings held in Washington D.C. on May 14-16, 2008, the Joint Subcommittee reviewed the ETC Background document. The scope of the Annual Plan Item 2.b.ii.1 "… including the elements of ETC for

[4] See id. at P 348. (NOTE: this is footnote 64)
[5] See Order No. 888 at 31,655. (NOTE: this is footnote 65)

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
Request No.: 2008 WEQ AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Request Title: Existing Transmission Commitments

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full implementation of the NERC MOD-001 reliability standard" was interpreted to include addressing the ETC components documented in MOD Standards MOD-028 (Area Interchange Methodology), MOD-029 (Rated System Path Methodology) and MOD-030 (Flowgate Methodology). The Joint Subcommittee reviewed each component and made the following determination:

- Network Integration Transmission Service (NITS) – The joint subcommittee decided not to address this component since NITS is currently within the scope of the ESS/ITS subcommittee and the ESS/ITS has already begun working on this area.
- Grandfathered Agreements – The joint subcommittee determined this ETC component should be within scope and has included standards in the recommendation.
- Rollover Rights – The joint subcommittee limited its scope for this ETC component to standards within WEQ-001 (Business Practices for Open Access Same-Time Information Systems (OASIS)). The joint subcommittee determined that it would not address WEQ-002 Business Practices for Open Access Same-Time Information Systems (OASIS) Standards and Communication Protocols), WEQ-003 Business Practices for Open Access Same-Time Information Systems (OASIS) Data Dictionary), and WEQ-013 Business Practices for Open Access Same-Time Information Systems (OASIS) Implementation Guide) since they are under the control of the ESS/ITS Subcommittee. The ESS/ITS has submitted recommendations that include rollover rights for these business practices, but have left the WEQ-001 changes to the Joint ESS/ITS and BPS Subcommittee.
- Point-to-Point Service – The Joint ESS/ITS and BPS determined that the requirements for point-to-point service have been documented sufficiently in the NAESB business practices such that no new business practices are required for the point-to-point service component of ETC.
- Other Services – The Joint ESS/ITS and BPS had considerable discussion on whether or not NAESB should develop requirements for documenting the Other Services component of the ETC in the ATCID, beyond what is included in the NERC MOD standards. The Joint ESS/ITS and BPS approved a motion on June 17, 2008 using a balanced vote which indicated they felt the NERC requirements appear to document sufficiently the Other Services description for inclusion in the ATCID.

At the June 13, 2008, Joint ESS/ITS and BPS Subcommittee meeting there was considerable discussion as to whether a separate ETC section should be created in WEQ-001 documenting references for all ETC components including those

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: WEQ Joint ESS/ITS and BPS Subcommittee
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Request Title: Existing Transmission Commitments

BPA Formal Comments on ETC

that are already addressed by the existing business pratices for point-to-point. A motion was approved using a "balanced vote" that stated:

> The joint subcommittee will enhance the summary and justification sections of the recommendation to explain why we are not documenting the point-to-point and NITS components in the recommendation and remove the heading for the ETC section with the grandfathered, rollover, and potentially the other services being stand-alone sections.

As a result of this motion, those ETC components for which new standards are being developed under this recommendation will be documented in separate sections in WEQ-001, such as Grandfathered Agreements and Rollover Rights, rather than creating a specific ETC section in WEQ-001.

Supporting Documentation:

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

- May 14 -16, 2008 (unavailable- DC)
- May 29, 2008 (unavailable- DC)
- June 12 -13, 2008 (unavailable- DC)
- June 17-18, 2008 (unavailable- DC)

Please review the Motions Document:

- ETC Motions Document

Please review the other interim work products developed by the Joint BPS and ESS/ITS Subcommittee including the:

- ETC Background Document
- ETC Concepts
- ETC Grandfathered Component
- ETC Rollover Rights Component
- ETC Other Services Component

ENTERGY COMMENTS

WEQ 2008 AP 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Existing Transmission Commitments
Due July 21, 2008

The proposed standard in 001-y.3 requires that the Transmission Provider shall set the rollover capacity to zero once the deadline for the Transmission Customer to submit a renewal request has passed. However, there could be cases when the Transmission Customer has submitted a renewal request for exercising the Rollover Rights and it has not been either acted upon by the Transmission Provider or confirmed by the Transmission Customer.. In such situations, removing rollover capacity from the ETC will result in inaccurate ATCs that are going to be posted on OASIS.

EXAMPLE:

A Transmission Customer has Rollover Rights of 500 MW over a path beginning January 1, 2010 with a deadline for a renewal request of September 30th 2009 for exercising these rights. The Transmission Customer has submitted a renewal request on September 30th 2009, just before the deadline, According to the proposed standard 001-y.3, the Transmission Provider will set the rollover capacity to zero on October 1st 2009 for the period January 1, 2010 on wards. This action will result in removal of 500 MW of Rollever Rights capacity from the ETC and will result in increase in ATC for the period beginning January 1, 2010 onward by 500 MW. Therefore, the ATC will be inaccurate as the status of Rollover Right has actually not changed since the Transmission Customer is in the process of exercising these rights but has not converted this into the actual reservation.

RECOMMENDATION:

In order to accurately reflect Rollover Rights in ETC that will result in accurate ATC calculations, Entergy suggests that this standards should be modified to append the language at the end of standard 001-y.3:

"provided Transmission Customer has not submitted a renewal request. If Transmission Customer has submitted a renewal request before the deadline, Transmission Provider shall wait to set the rollover capacity to zero till the deadline for confirmation of the renewal requets has passed and the Transmission Customer has not confirmed such request. If the renewal request is for an amount lesser than the original Rollover Right, the Transmission Provider shall set the Rollover Rights capacity to the capacity of renewal request in process".

Comments Submitted by E. Davis, Entergy

001-y.3 Once the deadline for the Transmission Customer to submit a renewal request has passed for a Long Term Firm Point-to-Point reservation, the Transmission Provider shall set the rollover capacity to zero, ***provided Transmission Customer has not submitted a renewal request. If Transmission Customer has submitted a renewal request before the deadline, Transmission Provider shall wait to set the rollover capacity to zero till the deadline for confirmation of the renewal requets has passed and the Transmission Customer has not confirmed such request. If the renewal request is for an amount lesser than the original Rollover Right, the Transmission Provider shall set the Rollover Rights capacity to the capacity of renewal request in process***.

Comments Submitted by J. Cashin and B. Green, EPSA

EPSA Comments to NAESB-Submitted by Jack Cashin and Barry Green

2008 WEQ Annual Plan Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1

Related to ETC

EPSA is not able to support approval of this standard as we do not believe this standard as recommended by the majority of the subcommittee provides sufficient transparency to meet the intent of FERC Order 890. It is also EPSA's opinion that the requirements of the Annual Plan have not been met. The Annual Plan item states:

> Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard.

NERC has defined Existing Transmission Commitments (ETC) as being comprised of Network Integration Transmission Service, Grandfathered Agreements, Rollover Rights, Point-to-Point Service and Other Services not otherwise included.

The subcommittee reviewed each of the components of this definition separately and the results of some of these discussions are supported by EPSA. EPSA's opinion on NAESB's proposed approach to each of the ETC component parts is detailed below.

The rollover rights portion of this standard is acceptable to EPSA, and on a stand-alone vote we would support it.

The Network Integration Portion of ETC is not yet available for comment as it is currently under debate at the ESS/ITS subcommittee so EPSA offers no comment at this time.

We also agree with the conclusion of the subcommittee that information already available on OASIS related to point-to-point service provides sufficient transparency and no additional standards are required.

However, for the two remaining components of ETC, Grandfathered Agreements and Other Services, the proposed standards are, in EPSA's opinion, unacceptable. These are the two components of ETC where, almost by definition, there is virtually no standardization and transparency is therefore most

Comments Submitted by J. Cashin and B. Green, EPSA

important. As a result EPSA is not able to support the proposal being submitted to the Executive Committee.

As mentioned, our objection is related primarily to the lack of transparency.

Grandfathered agreements are, by definition, non-standard. They were negotiated and signed in a time period where the pro forma tariff did not exist. The terms point-to-point and network service had not yet been created. The agreements were negotiated in many cases to cover very specific circumstances reflecting the needs and constraints of the two or more parties involved. However, these contracts have been imported into the post Order 888 market environment and TPs are required to provide the agreed service in that environment. As a result, they would have had to make accommodations or interpretations to "fit" them into the current structure of OASIS reservations and ATC calculations such that:

- The appropriate amount of TTC/ATC/AFC on the appropriate transmission interfaces has been removed from service;
- What we today call roll-over rights have been granted if appropriate;
- The customers are provided the right to re-direct the service if appropriate with appropriate adjustments being made to the ATC postings;
- The service is classified as firm or non-firm as appropriate, although those terms may not appear in the contracts, or if they do their meaning may be different than in today's usage;
- The transmission provider, perhaps an integrated utility when the contract was negotiated, may have certain obligations to backup the transmission service; etc.

With all of those non-standard provisions of potentially multiple contracts, standard 001-x.1 recommended by a majority of the subcommittee states that: "The Transmission Provider shall post on OASIS the aggregate MW value for the grandfathered agreements component of ETC associated with the ATC value posted on OASIS."

Therefore, for a transmission customer trying to understand the ATC calculation in order to make an informed commercial decision that may underlie a commitment to a transmission purchase over multiple years, supporting a purchase or sale of energy over that time period, *a single aggregate MW value for the grandfathered agreements* represents the total information that will be made available.

For FERC, wanting to verify that there is not undue discrimination resulting from implementation of these grandfathered contracts on OASIS, where some of the contracts might have involved an affiliate of the transmission provider as a party to the contract, *a single aggregate MW value for the grandfathered agreements* represents the total information that will be made available.

Comments Submitted by J. Cashin and B. Green, EPSA

EPSA believes this is insufficient.

Further we are being asked to accept that this *single aggregate MW value for the grandfathered agreements* represents fulfillment of the Annual Plan requirement to provide a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses".

EPSA does not agree.

Comments Submitted by J. Cashin and B. Green, EPSA

With respect to the "other services" component of the ETC calculation, the standard before the Executive Committee indicates that the majority of the subcommittee determined that NERC's definition was sufficient. Other services (firm or non-firm) is defined by NERC in MOD 28 and 29 as "the firm or non-firm capacity reserved for any other service(s), contract(s), or agreement(s) not specified above using Firm or Non-firm Transmission Service, including any other firm or non-firm adjustments to reflect impacts from other ATC Paths of the Transmission Service Provider as specified in the ATCID." However, the ATC Information Link standard previously recommended by the majority of the subcommittee and approved by the Executive Committee includes a provision that:

The posting of this information [which includes the ATCID] would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns.

The terms market, security or reliability sensitivity concerns have not been defined, leaving the transmission provider with virtually unfettered rights to redact information contained within the ATCID, including information related to Other Services.

EPSA believes this is insufficient.

For all of the above reasons, EPSA does not support this standard.

EPSA also notes that the proposal by the subcommittee does not recommend a standard for ETC, but rather standards for the component parts where, as is the case for point-to-point service, they do not already exist. As a result of this and the multitude of other WEQ-001 changes over the last several months, we believe that WEQ-001 is now a very difficult document to follow, from a user's point of view and would recommend that a re-organization of the document be undertaken. However, our objection to this standard, as documented above is much more fundamental.

Comments by PPL EnergyPlus (EPLU) regarding the NAESB WEQ AP Items 2.a.iv.4, 2.a.vi.4, and 2.b.ii.1

1. EPLU does not believe the NAESB business practice requires Transmission Service Providers (TSP's) to specifically state their ETC methodology on their OASIS. Part 001-x of this standard allows the TSP to put the methodology in their ATCID. Unfortunately, according to MOD-001 R4 and R5, the ATCID isn't posted for all to see. All market participants should have the right to see the ETC methodology as well as the ATCID. The ETC components must be public per FERC Order 890 para 247 and Order 890-A para 48. This will help everyone understand how historic rights to deliver power to and over the network are treated.
2. EPLU suggests that the NAESB business practice be more prescriptive and provide more guidance to TSP's on what existing transmission commitments to include and how to include these values in the ETC calculation. Both FERC Orders 890-para 245 and 890-A para 62 address the level of detail to be considered in the NAESB standard.
3. EPLU suggests that the NAESB business practice require TSP's to post not just the total Grandfathered amounts, but the details used to develop the total Grandfathered amount. FERC Order 890 para 240 indicates ALL reservations included in ETC should be published.
4. EPLU believes the business practice only addresses Rollover Rights for *new* LTF PTP transactions. However, rollover rights for existing LTF PTP must also be posted. FERC Order 890-A para 62 states rollover rights for ALL long-term reservations must be posted, not just new LTF PTP.

Reference: Existing Transmission Commitments (ETC) are addressed in Order 890 para 240-247, Order 890-A para 62-67 and 145-152. FERC Order 890-B Attachment C also addresses ETC.

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SRP Formal Comments on ETC Recommendation
2008 WEQ AP Item 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Due July 21, 2008

SRP has the following comments and recommendations to the Executive Committee regarding the ETC recommendation brought forth by the ESS/ITS/BPS.

1) Grandfathered Agreements

Regarding the Grandfathered Agreements portion, the ETC recommendation appropriately completes the annual plan items referenced above. The proposed standards provide transparency by requiring Transmission Providers to post the value they use for the Grandfathered component of ETC (Existing Transmission Commitments) as defined by NERC. The proposed standard provides a single place for posting the grandfathered component of ETC.

The subcommittees debated at length other options for transparency of grandfathered contracts and determined the posting of values by transmission provider, path and time horizon is sufficient and all that is feasible given the nature of these pre-OASIS agreements.

Posting of the Other Services component of the NERC ETC formula was not standardized as it is not clear at this time what that variable will be used for, or that it makes sense to lump the data into a posting. Proposed NERC standards require this information be available on request. No standards were proposed to the subcommittees to address this ETC component.

Regarding the standardization of ETC, the NERC standards have addressed this issue to the extent possible, whereas the NAESB standards are filling in the posting requirements that were not addressed by NERC. Determination of the amount of transfer capability to be set aside for Grandfathered contracts is straightforward and additional standards are not needed. Network Services issues will be dealt with separately.

2) Rollover Rights

Regarding the rollover part of the ETC recommendation, in proposed standard y.1 ”transtatus” is misspelled and should read “transstatus”

Secondly, SRP agrees with Entergy’s comments that the proposed 001-y.3 standard could cause unintended consequences. If it is not omitted, standard y.3 needs to be more specific in order to serve its intended purpose. The proposed standard reads as follows:

> Proposed 001-y.3 Once the deadline for the Transmission Customer to submit a renewal request has passed for a Long Term Firm Point-to-Point reservation, the Transmission Provider shall set the rollover capacity to zero.

SRP recommends standard y.3 be omitted from the recommendation and remanded to the subcommittees for further development while the remainder of this recommendation proceeds through the process.

In the alternative, SRP recommends the standard be modified to address the situations when a renewal, matching or competing request is pending, similar to the additional

SRP Formal Comments on ETC Recommendation
2008 WEQ AP Item 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
Due July 21, 2008

language proposed by Entergy in their formal comments. Additional rationale and description for this recommendation follow.

The subcommittees developed standard y.3 to have data within OASIS which can be used to have an automated way of accounting for rollover rights and their expiration so they are properly accounted for in the ATC calculations[1]. It is not clear this process needs to be automated as rollover rights will be available only to reservations of five years or longer, the evaluation of rollover requests is essentially a manual process anyway and a real-time response is not required. If the process is to be automated, the proposed standard y.3 is not sufficient to accomplish this.

Proposed Standard y.3 would free up rollover capacity regardless of whether there is a pending renewal request, confirmed renewal reservation, or no renewal request or reservation. The standard also does not address the possibility that the capacity should not be freed up because there is a pending matching or competing request or reservation using the rollover capacity. Lastly, if y.2 is performed subsequent to y.3, you could end up with *less* ATC being posted than is available. Looking at examples of these scenarios for a customer with 100 mw of rollover capacity demonstrates why standard y.3 is not sufficient:

Example 1
If a TP follows y.3 *when a customer has a pending renewal request*, the TP would set the rollover capacity to zero and therefore validation or re-validation that the renewal capacity equals or is less than the rollover capacity would fail unnecessarily. A TP will often re-validate a transmission request prior to approval to ensure all requirements continue to be met.

Secondly, a transmission provider may post ATC as a result of setting rollover capacity to zero, only to have the ATC withdrawn from OASIS again when the pending renewal, matching or competing request is confirmed. This would be a difficult situation to explain to customers and is the type of innocent event that leads to accusations of manipulation of ATC.

Thirdly, if a transmission provider per y.3 set the rollover capacity to zero, then subsequently confirmed the renewal reservation, per y.2 they would then have to reduce the rollover capacity by the capacity granted of the renewal reservation. This would result in negative rollover capacity and potentially less ATC being posted then is available, unless this negative value was then set back to zero. Such adjustment is not included in the current standards.

Given the matching rules for rollovers and the general nature of long-term requests, it would not be uncommon to have renewal requests pending past the renewal deadline where y.3 would result in inadequate information for the TP and frequently changing and misleading ATC postings for the customer.

[1] This justification was not listed in the rationale section and the minutes of the meetings were not available for the recommendation so this explanation is the one provided to Wendy Weathers via e-mail and phone by subcommittee meeting participants.

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Due July 21, 2008

Example 2
If the transmission provider follows y.3 *when a customer already has a confirmed renewal reservation for the full amount of the rollover capacity*, y.3 is unnecessary because the rollover capacity will already be set to zero based on proposed 001-y.2.

> Proposed 001-y.2 Upon confirmation of a renewal Long Term Firm Point-to-Point request by a Transmission Customer who exercises rollover rights, the Transmission Provider shall reduce the rollover capacity in the parent reservation's rollover template by the capacity granted of the renewal reservation.

So in this case y.2 would require the TP to reduce the rollover capacity from 100 mw to 100 – 100 = 0 mw at the time the renewal is confirmed. Then Y.3 would require the rollover capacity be set from zero to zero when the deadline for renewal has passed.

Example 3
If follow Y.3 when *a renewal request has not been submitted* in order to automate the creation of 'placeholder' reservations for unexercised rollover rights it may do no harm, but it is unclear how valuable this action is given the unintended consequences and the fact automation may not be necessary as described above.

3) Summary of proposed changes to the ETC recommendation

a) In total, the comments above result in the following recommended standard y redlined from the proposed standard y.

Proposed 001-y Rollover Rights

001-y.1 The Transmission Provider upon approving a Long Term Firm Point-to-Point request with rollover rights, shall post on OASIS the information relevant to the rollover rights. Such information shall be posted such that it can be viewed and queried using the transstatus and rollover templates (see WEQ-002 and WEQ-013).

001-y.2 Upon confirmation of a renewal Long Term Firm Point-to-Point request by a Transmission Customer who exercises rollover rights, the Transmission Provider shall reduce the rollover capacity in the parent reservation's rollover template by the capacity granted of the renewal reservation.

~~001-y.3 Once the deadline for the Transmission Customer to submit a renewal request has passed for a Long Term Firm Point-to-Point reservation, the Transmission Provider shall set the rollover capacity to zero.~~

b) Lastly, although the ESS/ITS/BPS intentionally did not recommend changes to the Implementation Guide, SRP recommends the Executive Committee make the following companion Implementation Guide changes to the proposed 001 Rollover Rights standards in order to use the new data elements previously defined for rollovers.

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Due July 21, 2008

013-2.6.2 RENEWAL Requests

Transmission Customers shall use the REQUEST_TYPE of RENEWAL to exercise rollover rights associated with an existing transmission service reservation held by the Transmission Customer. RENEWAL requests must always specify the Primary Provider as SELLER.

The following are specific restrictions or requirements for OASIS service requests with REQUEST_TYPE of RENEWAL.

Data Element	Restriction/Requirement
[ADDITIONAL ROWS NOT SHOWN HERE]	
CAPACITY_REQUESTED	Must be less than or equal to the amount of capacity eligible for renewal/rollover in ROLLOVER_CAPACITY over each ROLLOVER_START_TIME and ROLLOVER_STOP_TIME ~~the~~ interval ~~of service~~
BID_PRICE	Must specify the price to be paid for the service requested

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

RENEWAL requests must be submitted on OASIS prior to expiration of the Transmission Customer's rollover rights as established by the Tariff or business practice. [Add a space after the word "or"]

Comments Submitted by SRS

FORMAL COMMENTS

Quadrant:	Wholesale Electric Quadrant
Recommendation:	**Number:** 2008 AP Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1
	Title: Existing Transmission Commitments (ETC)
Submitted By:	Standards Review Subcommittee
Date:	July 19, 2008

Under the Standards Review Subcommittee (SRS) Scope of Work, which was approved by the SRS on March 6, 2008, the SRS agreed to review recommendations and if subcommittee deemed appropriate, they would submit advisory comments to the Executive Committee for consideration. As stated in the Scope of Work these comments are "not intended to change the scope of the Business Practices or recommendation, but to provide consistency and uniformity across all WEQ Business Practices."

The SRS is requesting the Executive Committee consider the following advisory redlined comments in their review of this recommendation.

3. RECOMMENDATION

SUMMARY:

The recommendation is intended to address the NAESB Existing Transmission Commitments requirements in FERC Order 890 under Docket numbers RM05-17 and RM05-25 in paragraphs 243, 244, and 246 and in FERC Order 890-A under Docket number RM05-17 and RM05-25 in paragraphs 63 and 151.

This recommendation addresses the WEQ 2008 Annual Plan Items:

2.a.iv.4 Posting of Existing Transmission Commitments (ETC)

2.a.vi.4 Posting of Existing Transmission Commitments (ETC)

2.b.ii.1 Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard.

The business practices developed to address this item will require coordination with the NERC Order 890 reliability standards development.

The Joint ESS/ITS and BPS Subcommittee reviewed the NERC MOD Standards MOD-028 (Area Interchange Methodology), MOD-029 (Rated System Path Methodology) and MOD-030 (Flowgate Methodology) and determined that the scope of this recommendation would be limited to those ETC components, which

Comments Submitted by SRS

they agreed were not addressed adequately in the existing NAESB standards or included in the scope of work assigned to the ESS/ITS Subcommittee. As a result of this decision the scope of the recommendation has been limited to the Grandfathered Agreement and Rollover Rights components of the ETC. There will not be a separate section for ETC.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 6.d**
Request Title: **Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources.**

1. RECOMMENDED ACTION:

_X_ Accept as requested
___ Accept as modified below
___ Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___ Change to Existing Practice
___ Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___ Initiation	___ Initiation
_X_ Modification	_X_ Modification
___ Interpretation	___ Interpretation
___ Withdrawal	___ Withdrawal
___ Principle	___ Principle
___ Definition	___ Definition
_X_ Business Practice Standard	_X_ Business Practice Standard
___ Document	___ Document
___ Data Element	___ Data Element
___ Code Value	___ Code Value
___ X12 Implementation Guide	___ X12 Implementation Guide
___ Business Process Documentation	___ Business Process Documentation

3. RECOMMENDATION

SUMMARY:

This recommendation addresses WEQ 2008 Annual Plan item 6.d, Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources The proposed standards will be incorporated into WEQ-001, Business Practice Standards for OASIS.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008AP 6.d**
Request Title: **Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources.**

RECOMMENDED STANDARDS:

Modifications to WEQ-001 (Revisions noted with redlines Requirements)

001-2.5.2 Reactive Supply and Voltage Control from Generation or Other Sources Service (RV) - is the provision of reactive power and voltage control by generating facilities or by other non-generation resources capable of providing this service that are under the control of the control area operator. This service is necessary to the provision of basic transmission service within every control area and in accordance with Standard 3.2 (and Schedule 2) of the pro forma tariff.

001-2.5.3 Regulation and Frequency Response Service (RF) - is provided for transmission within or into the transmission provider's control area to serve load in the area. Customers may be able to satisfy the regulation service obligation by providing generation with automatic generation control capabilities or by other non-generation resources capable of providing this service to the control area in which the load resides and in accordance with Standard 3.3 (and Schedule 3) of the pro forma tariff.

001-2.5.4 Energy Imbalance Service (EI) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour and in accordance with Schedule 4 of the pro forma tariff.

001-2.5.5 Operating Reserve - Spinning Reserve Service (SP) - is provided by generating units that are on-line and loaded at less than maximum output or by other non-generation resources capable of providing this service. They are available to serve load immediately in an unexpected contingency, such as an unplanned outage of a generating unit and in accordance with Standard 3.5 (and Schedule 5) of the pro forma tariff.

001-2.5.6 Operating Reserve - Supplemental Reserve Service (SU) - is generating capacity or other resources that can be used to respond to contingency situations. Supplemental reserve is not available instantaneously, but rather within a short period (usually ten minutes). It is provided by generating units that are on-line but unloaded, by quick-start generation, ~~and~~ by customer interrupted load or by other non-generation resources capable of providing this service and in accordance with Standard 3.6 (and Schedule 6) of the pro forma tariff.

001-2.5.7 Generator Imbalance Service (GI) - is provided when a difference occurs between the output of a generator located in the Transmission Provider's Control Area and a delivery schedule from that generator to (1) another Control Area or (2) a load within the Transmission Provider's Control Area over a single hour and in accordance with Schedule 9 of the pro forma tariff.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS/BPS Subcommittees**
Request No.:	**2008AP 6.d**
Request Title:	**Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources.**

4. SUPPORTING DOCUMENTATION

a. Description of Request:

On April 21, 2008 in Federal Energy Regulatory Commission Docket No. RM05-5-005 Commissioner Wellinghoff submitted a concurrence to the Commission's issuance of a Notice of Proposed Rulemaking. In his concurrence, Commissioner Wellinghoff encouraged NAESB and its stakeholders to amend WEQ-001, as soon as possible, to avoid any confusion between the Order No. 890 *pro forma* OATT definitions of certain ancillary service and the WEQ-001 definitions of those same ancillary services. Order No. 890 revised the referenced ancillary service definitions in the *pro forma* OATT to specifically reflect the possible role of demand resources in the provision of the cited ancillary services. The ancillary services cited in the concurrence include: Reactive Supply and Voltage Control, Regulation and Frequency Response, Energy Imbalances, Spinning Reserves, Supplemental Reserves, and Generator Imbalances.

b. Description of Recommendation:

Amend certain ancillary service definitions contained in WEQ-001 to reflect the definitions contained in the *pro forma* OATT as revised by Order No. 890

c. Business Purpose:

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Please review the following concurrence submitted by Commissioner Wellinghoff on April 21, 2008 in Federal Energy Regulatory Commission Docket No. RM05-5-005:

- http://www.naesb.org/pdf3/weq_atc_afc070808w24.pdf

Please review the following joint ESS/ITS and BPS Subcommittee meeting minutes:

- June 12-13, 2008
- June 17-18, 2008
- July 8-9, 2008

Please review the Motions Document:

- http://www.naesb.org/pdf3/weq_atc_afc070808a6.doc

Formal Comments of the Bonneville Power Administration
on 2008 WEQ Annual Plan Item 6.d, Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources.

BPA is concerned that retrofitting outdated definitions for these Ancillary Services may cause confusion for the industry in light of 890 pro forma language changes in Schedules 2-6, any modifications to the new Schedule 9, and the new NERC standards addressing related parameters and applicable Functional Model responsibilities. As an alternative, the following are recommended:

Recommendation 1:
As a longer-term solution, it is recommended that a NERC and NAESB jointly review these definitions. Language in the NAESB business practices regarding the parameters for ancillary services should closely reflect or be complimentary to the NERC reliability standards, where applicable. Such parameters are addressed in NERC mandatory reliability standards which are approved by FERC and are subject to sanction. The NERC standards are applicable to entities described and defined in the NERC Functional Model. Such NERC/NAESB review should ensure consistent use of terms, as follows:

- Use consistent NERC terms for industry entities (e.g., the term Control Area is no longer used in NERC standards).
- Reflect language in regulatory-approved version of NERC standards associated with Ancillary Services (e.g., the VAR standards that require all generators to supply reactive power via Automatic Voltage Regulation)

Recommendation 2:
For a shorter-term solution, the definition business practices regarding this proposal should refer to the pro forma tariff schedules and the applicable WEQ standard for the definitions for the Ancillary Services, rather than include a modified definition. This will eliminate any inconsistencies between the pro forma tariff schedules, the applicable WEQ standard, and the definitions. For example, WEQ-001-2.5.2 would read: Reactive Supply and Voltage Control from Generation or Other Sources Service (RV) – see Weq-001-3.2 and Schedule 2 of the pro forma tariff.

Please see sample language below:

001-2.5.2 Reactive Supply and Voltage Control from Generation or Other Sources Service (RV) See WEQ-001- 3.2 and Schedule 2 of the pro forma tariff.

001-2.5.3 Regulation and Frequency Response Service (RF) See WEQ-001-3.2 and Schedule 3 of the pro forma tariff.

001-2.5.4 Energy Imbalance Service (EI) See WEQ-001-3.2 and Schedule 4 of the pro forma tariff.

001-2.5.5 Operating Reserve - Spinning Reserve Service (SP) See WEQ-001.3.2 and Schedule 5 of the pro forma tariff.

Formal Comments of the Bonneville Power Administration
on 2008 WEQ Annual Plan Item 6.d, Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources.

001-2.5.6 Operating Reserve - Supplemental Reserve Service (SU) See WEQ-001-3.2 and Schedule 6 of the pro forma tariff.

001-2.5.7 Generator Imbalance Service (GI) See WEQ-001-3.2 and Schedule 9 of the pro forma tariff.

Thank you.

ENTERGY SERVICES COMMENTS

WEQ Annual Plan Item 6.d
Modify Definition of Certain Ancillary Service So They May Be Provided by Non-Generation Resources
Due August 11, 2008

Ed Davis
504-576-3029

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	Wholesale Electric Quadrant
Requesters:	WEQ Executive Committee
Request No.:	2008 AP 6.d
Request Title:	Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources

Entergy supports the adoption of this Recommendation.

SOUTHERN COMPANY

July 28, 2008

Southern Company Generation
Comments to Recommendation 2008AP 6.d

Southern Company Generation appreciates the opportunity to participate in the NAESB Business Practice Standards development process and respectfully requests that the WEQ Executive Committee receive and consider the following comments regarding Recommendation 2008AP 6.d.

Southern Company Generation recognizes and understands that these definitions are a carryover from pre-NAESB OASIS standards and that even these proposed modifications are essentially consistent with corresponding dialogue in the pro forma tariff. However, the Ancillary Services definitions in WEQ-001 Sections 2.5.2 through 2.5.7 have long since been in need of an overhaul. In the context of WEQ-001, these definitions ***should be*** defining the tariff-related service that is being offered to a transmission customer via OASIS ***in conjunction with his/her transmission service***. As such, the definitions in WEQ-001 serve a completely different purpose than does the language within the pro-forma tariff and therefore it is not necessary for these to match precisely. The pro forma tariff describes the service which is to be offered by the Transmission Provider to the potential Transmission Customers. The OASIS Standards therefore should define the service to be posted on OASIS within the context of the tariff description and should not attempt to merely replicate that description.

As recommended, the proposed changes to these definitions (i.e. to allow for the provision of these ancillary services by non-generating resources) only complicates these already out of date definitions and provides no additional meaningful information regarding how a non-generating resource can provide such services. Indeed, one might argue that in some cases the proposed changes appear to have made the definition somewhat meaningless (see e.g. Operating Reserve-Spinning). Whether a generating resource provides the service or some other type of resource provides the service does not change the nature of the service being offered by the Transmission Provider and certainly should not affect the definition of those services as provided for within OASIS.

Southern Company Generation believes that WEQ-001-2.5 is an inappropriate place within the NAESB standards to incorporate the Order 890 requirement to allow non-generating resources to provide ancillary services because these definitions were never intended to be a benchmark by which the "supply" of ancillary services was to be specified. Indeed, there is no place within the OASIS Standards in which such a business practice would be appropriate. The OASIS Standards describe the manner in which Transmission Providers make transmission service and associated ancillary services available to Transmission Customers; they do not (nor were they ever intended to) describe the manner in which Third Party Suppliers of ancillary services make such ancillary services available to the Transmission Provider.

Southern Company Generation believes it would be more appropriate for NAESB to develop a separate, stand-alone business practice standard that would describe the types of resources and equipment that are allowed to provide each of the ancillary services in the pro forma tariff. Therefore, Southern Company Generation suggests that the Executive Committee reject this recommendation as presented. Instead, it is suggested that this recommendation be

rescinded back to the appropriate subcommittee with instructions to overhaul these definitions to more closely correspond to the definition of a service being offered within the context of OASIS. The definition should not include the types of resources that can provide such services. Instead, Southern Company Generation suggests that the Executive Committee instruct the Business Practices Subcommittee to develop a new standard that specifically establishes the requirements for providing such ancillary services.

While not necessarily advocating specific final language for such, the following represents an example of the type of language that Southern Company Generation believes would more appropriately represent the definition of ancillary services within the OASIS Standards and offers such language for consideration by the appropriate subcommittee:

> *Reactive Supply and Voltage Control Service (RV): A service made available to the Transmission Customer in accordance with Schedule 2 of the pro forma tariff that represents the provision of reactive power that is necessary to support voltage degradations associated with the customer's transmission service.*
>
> *Regulation and Frequency Response Service (RF): A service made available to the Transmission Customer in accordance with Schedule 3 of the pro forma tariff that represents the process whereby a Balancing Authority balances the instantaneous load and frequency variations within its metered boundaries.*
>
> *Energy Imbalance Service (EI): A service made available to the Transmission Customer in accordance with Schedule 4 of the pro forma tariff that represents the process whereby a Balancing Authority accounts for the deviation between the scheduled and actual delivery of energy to a load in the local Balancing Authority over a single hour.*
>
> *Operating Reserve - Spinning Reserve Service (SP): A service made available to the Transmission Customer in accordance with Schedule 5 of the pro forma tariff that represents that portion of a Balancing Authority Area's Operating Reserves that is instantaneously available immediately following a contingency within its metered Boundaries.*
>
> *Operating Reserve - Supplemental Reserve Service (SU): A service made available to the Transmission Customer in accordance with Schedule 6 of the pro forma tariff that represents that portion of a Balancing Authority Area's Operating Reserves that is not available instantaneously but rather within a short period (usually ten minutes) following a contingency within its metered boundaries.*
>
> *Generator Imbalance Service (GI): A service made available to the Transmission Customer in accordance with Schedule 9 of the pro forma tariff that represents the process whereby a Balancing Authority accounts for the deviation between the scheduled and actual delivery of*

energy from a generator to (1) another Control Area or (2) a load within the Transmission Provider's Control Area over a single hour.

Southern Company Generation realizes that these comments may represent suggested actions that could be considered outside the scope of the original request. However, Southern Company Generation would ask the Executive Committee to consider the consequences of continuing to propagate an outdated set of standard definitions and even to make those definitions less meaningful through the passage of this recommendation. Granted, if the recommendation under consideration were to be passed as presented, everyone in the industry will know and understand the intent of the definitions. The industry will not miss one beat. However, the requirement from Order 890 to incorporate non-generating resources into ancillary service offerings presents the Executive Committee with a clear opportunity to significantly improve upon the existing standards. Southern Company Generation does not believe this recommendation takes proper advantage of that opportunity, and therefore has presented an alternate means by which this may be done.

Once again, thank you for the opportunity to participate in this process.

Sincerely

Joel Dison
Project Manager
Southern Company Generation

FORMAL COMMENTS

Quadrant:	Wholesale Electric Quadrant
Recommendation:	2008 AP Item 6.d – Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources
Submitted By:	Standards Review Subcommittee
Date:	July 25, 2008

Under the Standards Review Subcommittee Scope of Work, which was approved by the SRS on March 6, 2008, the SRS agreed to review recommendations and if subcommittee deemed appropriate, they would submit advisory comments to the Executive Committee for consideration. The subcommittee completed it reviewed of the recommendation and does not have any proposed changes for the Executive Committee to consider.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: Standards Review Subcommittee
Request No.: R07019
Request Title: Review/revised WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor

~~DRAFT~~

1. RECOMMENDED ACTION:

___Accept as requested
_X_Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

_X_Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___Initiation
_X_Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

Per Recommendation:

___Initiation
_X_Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

3. RECOMMENDATION

SUMMARY:
Revisions to the NERC the BAL-004 Standard remove inappropriate requirements on reliability coordinators who voluntarily agree to serve as Interconnection Time Monitors. NERC was concerned that if these changes are not made that "it is likely that one or more reliability coordinators may no longer voluntarily agree to perform the service."

The NAESB Standards Review Subcommittee requested that the NAESB Business Practice WEQ 006 (Manual Time Error Correction) be reviewed/revised so that the NAESB standard is in lock step with the NERC standard. Under the current NAESB requirements, a Reliability Coordinator voluntarily acting as the Interconnection Time Monitor is required to meet the NAESB requirements and is subject to FERC sanctions

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: Standards Review Subcommittee
Request No.: R07019
Request Title: Review/revised WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor

~~DRAFT~~

if found to be in violation of their tariff for not meeting the NAESB requirements. A similar case can be made for the NAESB Interconnection Time Monitor requirements as was made on the NERC side. It is likely that one or more Reliability Coordinators still will not voluntarily agree to act as the Interconnection Time Monitor if they are subject to financial penalties for performing a voluntary function.

In reviewing the Business Practice we also identified references to National Bureau of Standards which should be changed to National Institute of Standards and Technology (NIST). The National Bureau of Standards name was changed to NIST in 1988 as a part of the Omnibus Trade and Competitiveness Act.

The Business Practices Subcommittee has reviewed the Standards Request R07019 and the WEQ 006 (Manual Time Error Correction) and recommend the following changes to the standards.

RECOMMENDED STANDARDS:

006-0.8 **Time Error** – Accumulated time difference between time based on Interconnection frequency and the ~~National Bureau of Standards time~~National Institute of Standards and Technology.

006-3 The Interconnection Time Monitor shall calibrate its time error device at least annually against the National Institute of Standards and Technology. ~~National Bureau of Standards time~~.

006-4 **TIME ERROR INITIATION**

Time error corrections ~~shall~~ should start and end on the hour or half-hour, and notice ~~shall~~ should be given at least one hour before the time error correction is to start or stop. Time Error corrections shall last at least one hour, unless terminated by a Reliability Coordinator. Time Error corrections for fast time shall not be initiated between 0400-1100 Central Time except for in the Western Interconnection. All Balancing Authorities within an Interconnection shall make all Time Error corrections directed by the Interconnection Time Monitor for its Interconnection. All Balancing Authorities within an Interconnection shall make Time Error Corrections at the same rate.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: Standards Review Subcommittee
Request No.: R07019
Request Title: Review/revised WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor

~~DRAFT~~

006-5 INTERCONNECTION TIME MONITORING

Each Interconnection Time Monitor shall monitor time error and ~~shall~~ make a reasonable effort to initiate or terminate corrective action orders according to the following table:

Time (seconds)	*Initiation*		*Termination*	
	East	**West**	East	West
Slow	–10	-5	–6	±0.5
Fast	+10	+5	+6	±0.5

4. SUPPORTING DOCUMENTATION

a. Description of Request:

This description was extracted from the R07019 Standards Request:

Under the NERC proposed changes to the BAL-004 Standard they are removing inappropriate requirements on reliability coordinators who voluntarily agree to serve as Interconnection Time Monitors. NERC is concerned that if these changes are not made that "it is likely that one or more reliability coordinators may no longer voluntarily agree to perform the service."

The NAESB Business Practice should review WEQ 006 Manual Time Error Correction so that the NAESB standard is in lock step with the NERC standard. If a Reliability Coordinator voluntarily acting as the Interconnection Time Monitor is required to meet the NAESB requirements and subject to FERC sanctions if found to be in violation of their tariff for not meeting the NAESB requirements it is likely that one or more Reliability Coordinators still will not voluntarily agree to act as the Interconnection Time Monitor.

b. Description of Recommendation:

The Business Practices Subcommittee has changed the references of the National Bureau of Standards to the National Institute of Standards and Technology.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: Standards Review Subcommittee
Request No.: R07019
Request Title: Review/revised WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor

~~DRAFT~~

The Business Practices Subcommittee has modified language in section 006-4 and 006-5 to allow for some slight variances for the Interconnection Time Monitor so they will not be subject to tariff violations if they are not able to meet its requirements in all instances.

c. Business Purpose:

The purpose of the change is to provide some leeway to the entity who is voluntarily performing the Interconnection Time Monitor function so that they will not be penalized by FERC in the event they are making reasonable efforts to perform in that capacity. This change will keep the NAESB standards in lock step with the NERC standards.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

The Business Practices Subcommittee is in agreement with the Standards Review Subcommittee and NERC in an entity making best efforts to meet the requirements while performing a voluntary function will be subject to penalties from FERC there is the likelihood that no entity will be willing to assume the role of the Interconnection Time Monitor.

The following links are to reference document that support this recommendation.

- SRS meeting minutes November 19, 2007: http://www.naesb.org/pdf3/weq_srs111907fm.doc
- Standards request R07019: http://www.naesb.org/pdf3/r07019.doc
- NERC Urgent Action SAR for BAL-004: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/SAR_UA_BAL-004_13Sep07.pdf
- Redline to BAL-004-0 Time Error Correction: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/BAL-004-1_redline_Last_Approval_13Sep07.pdf
- Standard BAL-004-1 Time Error Correction approved by the NERC Board of Trustees: ftp://www.nerc.com/pub/sys/all_updl/standards/rs/BAL-004-1.pdf
- BPS meeting minutes April 25, 2008:

  http://www.naesb.org/pdf3/weq_bps042508dm.doc
- BPS meeting minutes June 4, 2008 (unavailable- DC

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: Standards Review Subcommittee
Request No.: R07019
Request Title: Review/revised WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor

1. RECOMMENDED ACTION:

___Accept as requested
_X_Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

_X_Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
_X_Modification	_X_Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

Revisions to the NERC the BAL-004 Standard remove inappropriate requirements on reliability coordinators who voluntarily agree to serve as Interconnection Time Monitors. NERC was concerned that if these changes are not made that "it is likely that one or more reliability coordinators may no longer voluntarily agree to perform the service."

The NAESB Standards Review Subcommittee requested that the NAESB Business Practice WEQ 006 (Manual Time Error Correction) be reviewed/revised so that the NAESB standard is in lock step with the NERC standard. Under the current NAESB requirements, a Reliability Coordinator voluntarily acting as the Interconnection Time Monitor is required to meet the NAESB requirements and is subject to FERC sanctions

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: Standards Review Subcommittee
Request No.: R07019
Request Title: Review/revised WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor

if found to be in violation of their tariff for not meeting the NAESB requirements. A similar case can be made for the NAESB Interconnection Time Monitor requirements as was made on the NERC side. It is likely that one or more Reliability Coordinators still will not voluntarily agree to act as the Interconnection Time Monitor if they are subject to financial penalties for performing a voluntary function.

In reviewing the Business Practice we also identified references to National Bureau of Standards which should be changed to National Institute of Standards and Technology (NIST). The National Bureau of Standards name was changed to NIST in 1988 as a part of the Omnibus Trade and Competitiveness Act.

The Business Practices Subcommittee has reviewed the Standards Request R07019 and the WEQ 006 (Manual Time Error Correction) and recommend the following changes to the standards.

RECOMMENDED STANDARDS:

006-0.8 **Time Error** – Accumulated time difference between time based on Interconnection frequency and the National Institute of Standards and Technology.

006-3 The Interconnection Time Monitor shall calibrate its time error device at least annually against the National Institute of Standards and Technology.

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006-4 **TIME ERROR INITIATION**

Time error corrections should start and end on the hour or half-hour, and notice should be given at least one hour before the time error correction is to start or stop. Time Error corrections shall last at least one hour, unless terminated by a Reliability Coordinator. Time Error corrections for fast time shall not be initiated between 0400-1100 Central Time except for in the Western Interconnection. All Balancing Authorities within an Interconnection shall make all Time Error corrections directed by the Interconnection Time Monitor for its Interconnection. All Balancing Authorities within an Interconnection shall make Time Error Corrections at the same rate.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: Standards Review Subcommittee
Request No.: R07019
Request Title: Review/revised WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor

006-5 INTERCONNECTION TIME MONITORING

Each Interconnection Time Monitor shall monitor time error and make a reasonable effort to initiate or terminate corrective action orders according to the following table:

Time (seconds)	*Initiation*		*Termination*	
	East	**West**	**East**	**West**
Slow	–10	-5	–6	±0.5
Fast	+10	+5	+6	±0.5

4. SUPPORTING DOCUMENTATION

a. Description of Request:

This description was extracted from the R07019 Standards Request:

Under the NERC proposed changes to the BAL-004 Standard they are removing inappropriate requirements on reliability coordinators who voluntarily agree to serve as Interconnection Time Monitors. NERC is concerned that if these changes are not made that "it is likely that one or more reliability coordinators may no longer voluntarily agree to perform the service."

The NAESB Business Practice should review WEQ 006 Manual Time Error Correction so that the NAESB standard is in lock step with the NERC standard. If a Reliability Coordinator voluntarily acting as the Interconnection Time Monitor is required to meet the NAESB requirements and subject to FERC sanctions if found to be in violation of their tariff for not meeting the NAESB requirements it is likely that one or more Reliability Coordinators still will not voluntarily agree to act as the Interconnection Time Monitor.

b. Description of Recommendation:

The Business Practices Subcommittee has changed the references of the National Bureau of Standards to the National Institute of Standards and Technology.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: Standards Review Subcommittee
Request No.: R07019
Request Title: Review/revised WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor

The Business Practices Subcommittee has modified language in section 006-4 and 006-5 to allow for some slight variances for the Interconnection Time Monitor so they will not be subject to tariff violations if they are not able to meet its requirements in all instances.

c. Business Purpose:

The purpose of the change is to provide some leeway to the entity who is voluntarily performing the Interconnection Time Monitor function so that they will not be penalized by FERC in the event they are making reasonable efforts to perform in that capacity. This change will keep the NAESB standards in lock step with the NERC standards.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

The Business Practices Subcommittee is in agreement with the Standards Review Subcommittee and NERC in an entity making best efforts to meet the requirements while performing a voluntary function will be subject to penalties from FERC there is the likelihood that no entity will be willing to assume the role of the Interconnection Time Monitor.

The following links are to reference document that support this recommendation.

- SRS meeting minutes November 19, 2007: http://www.naesb.org/pdf3/weq_srs111907fm.doc
- Standards request R07019: http://www.naesb.org/pdf3/r07019.doc
- NERC Urgent Action SAR for BAL-004: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/SAR_UA_BAL-004_13Sep07.pdf
- Redline to BAL-004-0 Time Error Correction: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/BAL-004-1_redline_Last_Approval_13Sep07.pdf
- Standard BAL-004-1 Time Error Correction approved by the NERC Board of Trustees: ftp://www.nerc.com/pub/sys/all_updl/standards/rs/BAL-004-1.pdf
- BPS meeting minutes April 25, 2008:

  http://www.naesb.org/pdf3/weq_bps042508dm.doc
- BPS meeting minutes June 4, 2008 (unavailable- DC

FORMAL COMMENTS

Quadrant:	Wholesale Electric Quadrant
Recommendation:	R07019 Review/revise WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor
Submitted By:	Ed Skiba
Date:	July 30, 2008

While reviewing the formal comments submitted for the recommendation "R07019 Review/revise WEQ-006 to remove/revise mandatory requirements for Interconnection Time Monitor", the BPS identified that a text replacement was incorrectly applied to the recommendation in sections 006-0.8 and 006-3.

In these sections the reference to the National Bureau of Standards was to be replaced with National Institute of Standards and Technology. However, in both instances the word "time" was inadvertently deleted. Prior to the Executive Committee taking action on the R07019 recommendation, please consider adding the word "time" into sections 006-0.8 and 006-3. The additional redline changes are listed below for your consideration.

006-0.8 **Time Error** – Accumulated time difference between time based on Interconnection frequency and the National Institute of Standards and Technology time.

006-3 The Interconnection Time Monitor shall calibrate its time error device at least annually against the National Institute of Standards and Technology time.

July 11, 2008

Dear NAESB:

Southern Company Transmission appreciates the opportunity to comment on the Recommendation to the NAESB WEQ Executive Committee for Request #R07019 entitled, "Review/Revised WEQ-006 To Remove/Revise Mandatory Requirements For Interconnection Time Monitor." We agree that a Reliability Coordinator, acting in a voluntary role as Interconnection Time Monitor, should not be subject to financial penalties for volunteering to perform that service for the Interconnection. We find it proper to allow the Interconnection Time Monitor to make a "best effort" to comply with the NAESB WEQ-006 Business Practice Standards as provided for by this recommendation. We support this recommendation.

In our review of this recommendation and the work performed by NERC on reliability standard BAL-004-1, we noted the intent to make the work of the Interconnection Time Monitor voluntary in nature. We also noted that, in BAL-004-1, NERC had vacated how the Interconnection Time Monitor is to be designated. Is this designation role a function that NERC also intended to pass to NAESB and, if so, should it not be addressed in WEQ-006? And, related to that issue, what happens if no Reliability Coordinator volunteers to perform the Interconnection Time Monitor function? There appears to be no fallback provided in either BAL-004-1 or WEQ-006.

Again, we want to thank NAESB for providing Southern Company Transmission the opportunity to comment on important industry matters such as this.

Regards,

Jim Busbin
Southern Company - Transmission

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008 AP 3.a.vi.1
Request Title: Represent ALL pre-Order 888 ("grandfathered") transmission and ancillary services in current use in OASIS (R05026 E)

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
__X__Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___Change to Existing Practice
__X__Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
___Modification	___Modification
___Interpretation	___Interpretation
__X__Withdrawal	__X__Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	__X__Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

In October 2005, Calpine submitted a Standards request outlining 13 proposed incremental enhancements to OASIS. These requests for enhancements were submitted prior to FERC Orders 890, 890-A and 890-B. A scoping document was subsequently developed by the WEQ Standards Review Subcommittee, which was reviewed by the WEQ Executive Committee.

At the May 8, 2007 Executive Committee Meeting, the Executive Committee determined many of the proposed enhancements were already addressed and requested the subcommittees consider six of the remaining enhancements. Each of these six remaining proposed enhancements were added as separate line items to the annual

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008 AP 3.a.vi.1**
Request Title: **Represent ALL pre-Order 888 ("grandfathered") transmission and ancillary services in current use in OASIS (R05026 E)**

plan for tracking purposes since the items were assigned to various subcommitees or working groups.

Annual Plan Item 3.a.vi.1 (R05026) was assigned to the BPS/ESS/ITS. The scope of this annual plan item is:

E. Represent ALL pre-Order 888 ("grandfathered") transmission and ancillary services in current use in OASIS.

- Currently, when transmission service is shown on OASIS, it is supposed to represent all of the service that has been procured by market participants to do functions. Transmission rights in existence before the issuance of FERC Order 888 were grandfathered and the Order did not mandate that these transmission rights be included in OASIS. It is difficult to have a full understanding of all commercial sales, when grandfathered transmission rights are not apparent. Utilities that own these rights should be required to use an OASIS number when they redirect. Such a standard would provide for a more efficient and equitable market and should be national. This enhancement would affect market participants that do not possess knowledge of the grandfathered transmissions. This standard is commercial in nature.

Based on the work the Joint ESS/ITS and BPS and the recommendation submitted for the Order 890 Existing Transmission Commitments work (2008 Annual Plan Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1), the Joint Subcommittee is recommending no further action be taken on this Annual Plan Item.

RECOMMENDED STANDARDS:

No new standards or changes to existing standards are proposed.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

Annual Plan Item 3.a.vi.1 - Represent ALL pre-Order 888 ("grandfathered") transmission and ancillary services in current use in OASIS.

b. Description of Recommendation:

The Joint Subcommittee is recommending that the proposed enhancement not be implemented.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008 AP 3.a.vi.1**
Request Title: **Represent ALL pre-Order 888 ("grandfathered") transmission and ancillary services in current use in OASIS (R05026 E)**

c. Business Purpose:

Provide increase transparency for grandfathered service.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

The Joint Subcommittee passed the following motion at its May 29, 2008, meetings during its discussion of the 2008 Annual Plan Items 2.a.iv.4, 2.a.vi.4 and 2.b.ii.1 (Existing Transmission Components).

> *The posting requirement for grandfathered component of ETC consists of posting of a MW value as used in the ATC formula (used to post ATC) with no additional requirement for the grandfathered component. For MOD 30 posting of equivalent information is acceptable.*

Based upon this motion and review of the proposed enhancement documented in R05026 E (2008 AP 3.a.vi.1), the Joint Subcommittee passed the following motion at its July 9, 2008, meeting.

> *With regards to 2008 Annual Plan item 3.a.vi.1 (R05026 item e), NERC has addressed the treatment of grandfathered agreements in the calculation of ETC and NAESB is developing complimentary business practice standards associated with the posting of information associated with the grandfathered agreements component in the calculation of ETC. The subcommittee therefore has determined that no further action will be taken on this item. The co-chairs will write a recommendation that no further action be taken and will bring the recommendation back to the subcommittee for a vote after notice of the vote has been provided.*

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

- May 29, 2008 (unavailable- JB)
- July 8-9, 2008 (unavailable- CG)
- July 17, 2008 (unavailable- DC)

Please review the Motions Documents:

- ETC Final Motions
- Additional Annual Plan Items Motions

Standards Request Documents

- R05026
- R05026 Scoping Document

Please review the Executive Committee Meeting Minutes

- WEQ EC Final Meeting Minutes May 8, 2008

ENTERGY SERVICES COMMENTS

WEQ Annual Plan Item 3.a.vi.1
Address Pre-Order 888 (grandfathered) transmission and Ancillary Services in Current Use
Due August 18, 2008

Ed Davis
504-576-3029

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	Wholesale Electric Quadrant
Requesters:	WEQ Executive Committee
Request No.:	2008 AP 3.a.vi.1
Request Title:	Represent ALL pre-Order 888 (“grandfathered”) transmission and ancillary services in current use in OASIS (R05026E)

Entergy supports the adoption of this Recommendation.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: WEQ

Requesters: ESS/ITS/BPS Subcommittees
Request No.: 2008 AP 2.b.i.2
Request Title: Remaining requirements documented in R05004 and R05004A

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
__X__Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___Change to Existing Practice
__X__Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
___Modification	___Modification
___Interpretation	___Interpretation
__X__Withdrawal	__X__Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	__X__Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

Standards Request R05004 was originally submitted by the ATCT SAR Drafting Team on December 12, 2005, and was subsequently revised on August 8, 2006, to reflect potential requirements which were documented in the Notice Of Proposed Rulemaking (Dockets Docket Nos. RM05-17-000 and RM05-25-000). Since the Standards Request was written FERC has issued Orders 890, 890-A and 890-B. Both NERC and NAESB have developed standards to support these orders. At the July 9, 2008, ESS/ITS and BPS meeting it was determined that all but one item in the original and revised standards request had been addressed. That one item is now being tracked separately (see 2008 AP Item 2.b.i.1). As a result of that review the Subcommitee is recommending that no further action be taken on this Annual Plan Item.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008 AP 2.b.i.2**
Request Title: **Remaining requirements documented in R05004 and R05004A**

RECOMMENDED STANDARDS:

No new standards or changes to existing standards are proposed.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

Annual Plan Item 2.b.i.2 – Remaining Requirements documented in R05004 and R05004A.

b. Description of Recommendation:

The Joint Subcommittee is recommending that no further action be taken on this Annual Plan Item.

c. Business Purpose:

Provide increase transparency ATC related information.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

During its July 9, 2008, meeting the Joint Joint BPS and ESS/ITS ATC/AFC Subcommittee reviewed each of the proposed requirements documented in R05004 which includes both the original proposed requirements from December 12, 2005, and the revised Standards Requested dated August 8, 2006. An analysis of each requirement was performed by the Joint Subcommittee and the results are documented in R05004A Revised 8/15/06 with Subcommittee Comments document. Based on this analysis the Joint Subcommittee passed the following motion.

> *The co-chairs will request changes to the 2008 Annual Plan to identify request that 2008 AP item 2.b.i be split into 2 line items. One line item will be 1a (from Request 05004A) the other line item will be the remainder of Request 05004A. The line item 1a will be assigned to the ESS/ITS and will cross-reference the Network Service work from Order 890. 2008 AP Item 3.a.v will remove the cross reference to this annual plan item number. The co-chairs will write a recommendation for the 2nd line item that no further action be taken and will bring the recommendation back to the subcommittee for a vote after notice of the vote has been provided.*

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

- July 8-9, 2008 (unavailable- CG)
- July 17, 2008 (unavailable- DC)

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS/BPS Subcommittees**
Request No.: **2008 AP 2.b.i.2**
Request Title: **Remaining requirements documented in R05004 and R05004A**

Please review the Motions Documents:

- Additional Annual Plan Items Motion

Standards Request Documents

- R05004
- R05004A (redlined)

ENTERGY SERVICES COMMENTS

WEQ Annual Plan Item 2.b.i.2
Remaining Requirements Documented in R05004 and R05004A
Due August 18, 2008

Ed Davis
504-576-3029

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: Wholesale Electric Quadrant
Requesters: WEQ Executive Committee
Request No.: 2008 AP 2.b.i.2
Request Title: Remaining requirements documented in R05004 and R0500

Entergy supports the adoption of this Recommendation.

To: NAESB Office; WEQ Executive Committee Chairs

From: Barbara Rehman, Bonneville Power Administrative

Subject: Minor Corrections
2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3

WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting

Date: June 19, 2008

During a review of the above Recommendation currently out for member ratification, it was determined that there is a need to make the following changes:

(Redline)

1. RECOMMENDED ACTION:

___Accept as requested
XX Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

XX Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
XX Modification	XX Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
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___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

In the FERC Order 890 (paragraph 1378) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about re-bid of partial service. In FERC Order 890-A under docket Nos. RM-05-17 and RM05-25, the Commission declined to dictate beyond the principles outlined in Order 890 for rebid of partial service. (See paragraph 766).

In the FERC Orders 890 (paragraphs 1392 and 1401) and FERC Order 890-A (paragraphs 786-790) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about preconfirmation priority.

In the FERC Orders 890 (paragraph 413) and FERC Order 890-A (paragraph 142) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of transmission service metrics.

In the FERC Orders 890 (paragraph 1318) and FERC Order 890-A (paragraphs 718, 720, 721, 722) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of planning study metrics.

In the FERC Order 890 (paragraph 1162) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about redispatch cost postings.

The ESS/ITS has reviewed Orders 890 and 890-A and is recommending adoption of the following revisions to existing standards WEQ-001, WEQ-002, and WEQ-013. The Subcommittee believes this recommendation complies with the guidance provided by the Commission. The subcommittee is recommending moving some of the information link requirements from WEQ 002 to WEQ 001. Finally the Subcommittee is recommending recognition of a Generator Imbalance Ancillary Service.

RECOMMENDED STANDARDS:

Add the following language to the Introduction section of WEQ-001:

Introduction

In the event of a conflict between these business practices and the Primary Provider's Tariff, the Tariff shall have precedence.

The following proposed additions are to be included in the WEQ-001 Definition of Terms. The specific enumeration for each of these definitions will be established by NAESB Staff after ratification.

001-0.xx **Control Area** – As used in NAESB Standards, shall be synonomous with the NERC definition for the Balancing Authority Area.

001-0.yy **Partial Service** - transmission service offered or granted by a Transmission Provider that is for a shorter duration than requested (start-time through stop-time), less capacity than requested, or both.

The following are proposed redlined changes and additions to WEQ-001-2 Standard Terminology for Transmission and Ancillary Services

001-2.1.9 Sliding Yearly

The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year.

For example SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

001-2.1.13 Extended Yearly

The service starts at 00:00 of any date and stops at 00:00 more than one year later.

The Transmission Provider may limit the service to be in increments of full years or full calendar months.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

Other Service Attribute Values

Seven ancillary services are pre-defined. Other services may be offered pursuant to filed tariffs.

001-2.5.4 Energy Imbalance Service (EI) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour and in accordance with Schedule 4 of the pro forma tariff.

…

001-2.5.7 Generator Imbalance Service (GI) - is provided when a difference occurs between the output of a generator located in the Transmission Provider’s Control Area and a delivery schedule from that generator to (1) another Control Area or (2) a load within the Transmission Provider’s Control Area over a single hour and in accordance with Schedule 9 of the pro forma tariff.

The following are proposed redlined changes and additions to WEQ-001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4.1 All reservations and price and/or capacity negotiations shall be conducted on OASIS.

Phase IA Negotiation Process State Transition Diagram

The NAESB OASIS Implementation Guide (WEQ-013) provides a process state diagram to define the Transmission Customer and Transmission Provider interactions for negotiating transmission service. This diagram defines the allowable steps in the reservation request, negotiation, approval, confirmation and post-confirmation processes.

001-4.4 RESERVED

001-4.5 RESERVED

Negotiations Without Competing Bids

The following practices are defined in order to enhance consistency of the reservation process across OASIS nodes.

001-4.6 A Transmission Provider/Seller shall respond to a Transmission Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-2 Reservation Timing Requirements.** The time limit is measured from the time the OASIS Transmission request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

I. INVALID
II. DECLINED
III. REFUSED
IV. COUNTEROFFER
V. ACCEPTED
VI. RECEIVED or STUDY (leading to REFUSED, DECLINED, COUNTEROFFER, or ACCEPTED).

001-4.7 Prior to setting a request to ACCEPTED, COUNTEROFFER, or REFUSED a Transmission Provider shall evaluate the appropriate resources and ascertain that the requested transfer capability is (or is not) available.

001-4.7.1 If the Transmission Provider determines there is insufficient transfer capability available to grant the Transmission Customer's request and there is no obligation to provide Partial Service (or Partial Service is also not available in cases where the Transmission Provider is obligated to

provide Partial Service), the Transmission Provider may respond by setting the request status to REFUSED.

001-4.7.2 If the Transmission Provider determines there is sufficient transfer capability available to grant the Transmission Customer's request and the customer's bid price is at least equal to the provider's current posted offer price over time and all other Transmission Provider requirements have been met, the Transmission Provider shall respond by setting the request status to ACCEPTED.

001-4.7.2.1 If the Transmission Customer does not specify a bid price, the Transmission Provider shall consider the bid price to be equal to the current posted offer price when evaluating the request.

001-4.7.3 The Transmission Provider shall use the status of COUNTEROFFER to initiate the negotiation of requested capacity (Partial Service) and/or price.

001-4.7.3.1 The Transmission Provider is not required to provide short-term Partial Service in response to a Long-Term request.

001-4.7.3.2 If the available transfer capability can support only a portion of the total capacity requested by the Transmission Customer and the Transmission Provider is obligated or elects to offer what limited capability is available to the customer, the Transmission Provider shall notify the Transmission Customer on OASIS by setting the amount of capacity being offered over time in the transmission request and updating the request status to COUNTEROFFER.

001-4.7.3.3 If the Transmission Customer is attempting to negotiate price by submission of a bid price that is lower or higher than the current posted offer price, and the Transmission Provider elects to not negotiate price, the Transmission Provider shall notify the customer by setting the request status to DECLINED.

001-4.7.3.4 If the Transmission Provider elects to ~~or~~ continue to negotiate price, the Transmission ~~p~~Provider shall update the offer price over time in the transmission request, indicate whether the price being negotiated is higher or lower than the posted price, and set the request status to COUNTEROFFER.

001-4.7.3.5 If both capacity and price are being negotiated, that negotiation may be performed simultaneously.

001-4.8 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

001-4.9 The Transmission Customer may change a request from QUEUED, RECEIVED, STUDY, COUNTEROFFER, REBID, or ACCEPTED to WITHDRAWN at any time prior to CONFIRMED except as follows.

001-4.9.1 Preconfirmed requests for short-term firm and non-firm point-to-point service shall not be allowed to be WITHDRAWN by the Transmission Customer unless counteroffered by the Transmission Provider, after which the Transmission Customer shall be allowed to withdraw the request.

001-4.9.2 For a preconfirmed request for short-term firm point-to-point service, if the Transmission Provider has notified the Transmission Customer that a System Impact Study is needed, the Transmission Customer may, prior to execution of the System Impact Study Agreement, request that the Transmission Provider void (status of DECLINED) the request. The Transmission Provider must honor such request.

001-4.9.3 In cases of inadvertent error, the Transmission Customer may in the very near term request that the Transmission Provider void (status of ANNULLED) a pre-confirmed request/reservation for short-term firm or non-firm point-to-point service. Honoring such a request is at the discretion of the Transmission Provider.

001-4.10 From ACCEPTED or COUNTEROFFER, a Transmission Customer may change the status to CONFIRMED, REBID or WITHDRAWN. The Transmission Customer has the amount of time designated as Customer Confirmation Time Limit in Table 4-2 Reservation Timing Requirements to change the state of the request to CONFIRMED. The Customer Confirmation ~~t~~Time ~~l~~Limit is measured from the first time the request is moved to ACCEPTED or COUNTEROFFER, and is not reset with subsequent iterations of negotiation.

001-4.10.1 The Transmission Customer shall use the request status of REBID to initiate or continue the negotiation of price and/or capacity.

001-4.10.2 The Transmission Customer may negotiate for a lower amount of transmission capacity by updating the capacity requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID. For example, the Transmission Customer may choose to coordinate the level of transmission service purchased across multiple Transmission Providers or other such purposes. Negotiation for a higher amount of transmission capacity shall not be allowed. A Transmission ~~c~~Customer seeking additional capacity must submit a new request which will be assigned a new queue position.

001-4.10.3 The Transmission Customer may negotiate for a higher or lower price by updating the bid price requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID.

001-4.10.4 The Transmission Customer shall positively acknowledge and agree to both the price and capacity over time by setting the bid price and requested capacity equal to the Transmission Provider's offer price and granted capacity prior to confirmation of the transmission service request.

001-4.12 Should the Transmission Customer elect to initiate or continue the negotiation of price and/or capacity by moving a transmission service request to REBID, the Transmission Provider shall respond by taking the request to a DECLINED, SUPERSEDED, ACCEPTED, or COUNTEROFFER state within the Provider Counter Time Limit, specified in **Table 4-2 Reservation Timing Requirements.** The Transmission Provider response time is measured from the most recent REBID time.

001-4.12.1 The Transmission Provider shall positively acknowledge and agree to both the price and capacity over time by setting the offer price and granted capacity equal to the Transmission Customer's bid price and requested capacity prior to acceptance of the transmission service request.

001-4.13 The following timing requirements shall apply to all Point-to-Point transmission service requests:

TABLE 4-2
Request Timing Requirements

Class	Service Increment	Time QUEUED Prior to Start	Provider Evaluation Time Limit[1]	Customer Confirmation Time Limit[2] after ACCEPTED or COUNTEROFFER[3]	Provider Counter Time Limit after REBID[4]
Non-Firm	Hourly	<1 hour	Best effort	5 minutes	5 minutes
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes	10 minutes
Non-Firm	Daily	N/A	30 minutes	2 hours	10 minutes
Non-Firm	Weekly	N/A	4 hours	24 hours	4 hours
Non-Firm	Monthly	N/A	2 days [5]	24 hours	4 hours
Firm	Daily	< 24 hours	Best effort	2 hours	30 minutes
Firm	Daily	N/A	30 days[6]	24 hours	4 hours
Firm	Weekly	N/A	30 days[6]	48 hours	4 hours
Firm	Monthly	N/A	30 days[6]	4 days	4 hours
Firm	Yearly	60 days [7]	30 days	15 days	4 hours

Notes for Table 4-2:

[1] Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.

[2] Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override pre-exemption deadlines.

[3] Measurement starts at the time the request is first moved to either ACCEPTED or COUNTEROFFER. The time limit does not reset on subsequent changes of state.

[4] Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.

[5] Days are defined as calendar days.

[6] Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers shall make best efforts to respond within 72 hours, or prior to the scheduling deadline, whichever is earlier, to a request for Daily Firm Service received during period 2-30 days ahead of the service start time.

[7] Subject to Section 17.1 of the pro forma tariff, whenever feasible and on a nondiscriminatory basis, ~~t~~Transmission ~~p~~Providers should accommodate requests made with less than 60 days notice.

Negotiations with Competing Bids for Constrained Resources

001-4.14 The following are the relative queue priorities of Service Request Tiers[1]. The priorities refer only to negotiation of service and do not refer to curtailment priority.

001-4.15 Reservations and requests shall be handled in a first-come-first-served order based on QUEUE_TIME. Within a given Service Request Tier, with the exception of Service Request Tier 1, where there are competing requests for a constrained resource, the following request attributes shall be used to determine the relative priority for granting of service.

I. ..... Service Increment (Monthly, Weekly, Daily, Hourly)
II. ..... Duration (the amount of time between the Start Date and the Stop Date)
III ..... Pre-confirmation Status
IV…… ..Price
V……..Queue Time

001-4.16 Table 4-3 describes the relative queue priorities of competing service requests and reservations, with respect to the conditions whereby a subsequent request preempts a previously queued request or reservation, and the rules for offering right-of-first-refusal. If two competing requests do not meet the specific criteria listed in Table 4-3, the requests shall be evaluated and processed in a first-come-first-served order based on QUEUE_TIME. While the table indicates the relative priorities of two competing requests, it also is intended to be applied in the more general case of more than two competing requests.

Table 4-3
Priorities For Competing Reservations And Requests

[1]Note: The term Tier is introduced to avoid confusion with existing terms such as TS_CLASS.

ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
1	Tier 1: Long-term Firm, Native Load, and Network Firm	N/A - Not preempted by a subsequent request.	N/A
2	Tier 2: Pending (not confirmed) or confirmed but conditional Short-term Firm	Tier 1: Long-term Firm, Native Load, and Network Firm, Once Request 1 is unconditional, it may not be preempted.	No
3a	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment.	No
3b	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	No
3c	Tier 2: Pending pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] but higher price	No
3d	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	No
3e	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment and of equal or longer duration[1]	No
3f	Tier 2: Confirmed but conditional[2] Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	Yes
3g	Tier 2: Confirmed but conditional[2] Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	Yes
3h	Tier 2: Confirmed but conditional[2] Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] but higher price.	Yes
4	Tier 3: Network Service From Non-Designated Resources	Tiers 1 and 2: All Firm (including Network).	No
5	Tier 4: All Non-Firm PTP	Tiers 1 and 2: All Firm (including Network).	No
6	Tier 4: All Non-Firm PTP	Tier 3: Network Service from Non-Designated Resources.	No
7	RESERVED		

ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
7a	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment.	No
7b	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	No
7c	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration but higher price	No
7d	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment	No
7e	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment and of equal or longer duration[1]	No
7f	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration but higher price	No
7g	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm of higher service increment	Yes
7h	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	Yes
8	RESERVED		
9	Tier 5: Non-firm PTP Service over secondary receipt and delivery points.	Tiers 1 through 4	No
10	Tier 6: Non-firm Next Hour Market Service	Tiers 1 through 5	No

Notes for Table 4-3:

[1] Longer duration means more multiples of the same SERVICE_INCREMENT in a single request. Each such multiple must be at the same level of capacity. For example, a single request for three consecutive days shall be considered longer duration than a single request for two consecutive days. Also, multiple service requests or reservations may not be grouped for the purpose of determining duration. For example, three separate one-day requests for three consecutive days of service shall not be considered longer duration than a single request for two consecutive days.

[2] Short term firm reservations that are conditional as defined in Section 13.2 of the pro forma tariff.

001-4.17 For a request or reservation that is SUPERSEDED or DISPLACED, respectively, the Transmission Provider must indicate the Assignment Reference Number of the competing request and the reason for denial of service in the SELLER_COMMENTS field.

001-4.18 Given competing requests for a constrained resource when a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from any pending (not confirmed) state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-3. These state changes require dynamic notification to the Transmission Customer if the Transmission Customer has requested dynamic notification on OASIS.

001-4.26 RESERVED

001-4.27 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

The following are proposed additions to the WEQ-001 OASIS Standards

001-13 OASIS GENERAL POSTING STANDARDS

001-13.1 OASIS HOME PAGE

The Transmission Provider shall establish the following HTML hyperlinks to standardized information postings of a general (i.e., non-template) nature located on the Transmission Provider's OASIS Home Page at their registered OASIS URL address. These links must appear as named and in the following order:

NAESB Home Page

Standards of Conduct

Performance Metrics

Business Practices, Waivers, and Exemptions

ATC Information

Nothing in this standard shall preclude the Transmission Provider from establishing additional hyperlinks or making additional content available on their OASIS Home Page.

In the case where a Transmission Provider has ~~several~~ one or more Transmission Owners who~~, the TO's~~ are subject to the Standards of Conduct ~~links and information~~posting requirements, ~~. In that case,~~ the Transmission Provider will ~~have~~ provide links to ~~the~~ such postings on each of the individual Transmission Owner's website~~s~~. The information posted on the individual Transmission Owner's website~~s~~ ~~will follow~~ shall be posted according to WEQ-001-13.1.2.

001-13.1.1 NAESB HOME PAGE LINK

The "***NAESB Home Page"*** hyperlink shall direct an OASIS user to the NAESB Home Page.

001-13.1.2 STANDARDS OF CONDUCT LINK

The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g,* Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g,* Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the "***Standards of Conduct***" link displayed on the Transmission Provider's OASIS Home Page.

Emergency Circumstances Deviations (§358.4(a)(2))

Marketing and Energy Affiliate List (§358.4(b)(1))

Shared Facilities (§358.4(b)(2))

Organizational Charts and Job Descriptions (§358.4(b)(3)(i))

Common Employees (§358.4(b)(3)(iii))

Potential Merger Partners (§358.4(b)(3)(v))

Transfers[2] (§358.4(c))

Information Disclosure[3] (§358.5(b) (3))

Voluntary Consent to Share Non-Affiliated Customer Information (§358.5(b)(4))

Discretionary Actions under Tariff [4] (§358.5(c)(4))

Discounts[5] (§358.5(d))

Chief Compliance Officer (§358.4(e)(6))

Written Procedures for Implementation (§358.4 (e)(3))

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to Standards of Conduct. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to WEQ 002-3.1

[2] According to WEQ 002-4.3.10.4 a template is required for this item.
[3] According to WEQ 002-4.3.10.6 a template is required for this item.
[4] According to WEQ 002-4.3.10.5 a template is required for this item.
[5] According to WEQ 002-4.3.2.1 a template is required for this item.

001-13.1.3 PERFORMANCE METRICS LINK

The following types of information, as required by FERC Statutes and Regulations (18 CFR 37.6(h), 18CFR 37.6(i), and 18 CFR 37.6(j)(2)) shall be accessible from the ***"Performance Metrics"*** link.

a. The Transmission Provider shall establish a link entitled ***"Transmission Study Metrics"*** to view the information as required by 18 CFR 37.6(h), Posting and retention requirements for this information are addressed in WEQ-001-1.6(h)(2) and (4).

~~The information must be made available on a calendar quarterly basis and be posted within 15 days of the end of the quarter. The information must remain available on OASIS for three years after its posted date. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.~~

b. The Transmission Provider shall establish a link entitled ***"Transmission Service Request Metrics"*** to view the information as required by 18 CFR 37.6(i). The information must be made available on a monthly basis and be posted by the 15th day of the subsequent month. The information must remain available for download on OASIS for three months after its posted date. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

c. The Transmission Provider shall establish a link entitled ***"Redispatch Cost"*** to view the information as required by 18 CFR 37.6(j)(2). The data must be made available on a monthly basis and be posted as soon as practical after the end of each month, but no later than when the invoice for redispatch-related services is sent to the Transmission Customer. The information must remain available for download on OASIS for three months after its posted date. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

001-13.1.4 BUSINESS PRACTICES, WAIVERS, AND EXEMPTIONS LINK

The Transmission Provider shall post information related to 1) any Transmission ~~p~~Provider~~ -~~ specific business practices, 2) any waivers or exemptions granted from any of the OASIS requirements or standards, and 3) any other pertinent information related to the conduct of business with the Transmission Provider.

001-13.1.5 ATC INFORMATION LINK

The following are proposed redlined changes to WEQ-002-3.4 PROVIDER UPDATING REQUIREMENTS

002-3.4 PROVIDER UPDATING REQUIREMENTS

The following are the Provider update requirements:

a. **Provider Posting of TS Information**: Each Provider (including Secondary Providers and Value-Added Providers) shall be responsible for writing (posting) and updating TS Information on their OASIS Node. No User shall be permitted to modify a Provider's Information.

b. **General Postings**

(i) **INFO.HTM:** Each Provider shall provide general information on how to use their node and describe all special aspects, such as line losses, congestion charges and assistance. The address for the directory of this information shall be INFO.HTM (case sensitive), an HTML web page, linked to the Provider's registered URL address. See WEQ 002-4.5 for information required to be on the web page INFO.HTM.

(ii) **OASIS Home Page:** NAESB Standard WEQ-001-13 establishes specific HTML hyperlinks which must be made available on the Transmission Provider’s OASIS home page at their registered URL address.

…

The following are redlined changes to WEQ-002-4.5 GENERAL POSTINGS

002-4.5 GENERAL POSTINGS

002-4.5.1 INFO.HTM

When a regulatory order requires informational postings on OASIS and there is no OASIS S&CP template to support the postings or it is deemed inappropriate to use a template, or the location of the posting has not been specified in WEQ-001-13, there shall be a reference in INFO.HTM to the required information, including, but not limited to, references to the following:

- A common source of interconnection wide curtailment and interruption information, such as the NERC Transmission Loading Relief (TLR) web site.
- The location of the list of system studies conducted.
- Information on requesting the text file of the tariffs and service agreements.

For the purposes of this section, any link to required informational postings that can be accessed from INFO.HTM would be considered to have met the OASIS posting requirements, provided that the linked information meets all other OASIS accessibility requirements.

002-4.5.2 OASIS Home Page The NAESB WEQ-001-13 Standards establishes specific informational postings that must be accessible from the Transmission Provider's OASIS Home Page.

The following are proposed redlined changes to WEQ-013-2.2 Transaction Status to reflect the addition of WEQ-001- 4.9.3. Note: The definition of ANNULLED for the Data Dictionary Element Name Status will also be changed to reflect the addtion of WEQ-001- 4.9.3.

013-2.2 Transaction Status

ANNULLED = assigned by the Seller when, by mutual agreement with the Customer, a reservation or pre-confirmed request is to be voided, or assigned unilaterally by the Primary Provider when a resale reservation is to be voided. (Final state).

4. SUPPORTING DOCUMENTATION

a. Description of Request:

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions relevant to recommendation:

413 The Commission adopts the proposed requirement to post on OASIS metrics related to the provision of transmission service under the OATT. Specifically, transmission providers must post (1) the number of affiliate versus non-affiliate requests for transmission service that have been rejected and (2) the number of affiliate versus non-affiliate requests for transmission service that have been made. This posting must detail the length of service request (e.g., short-term or long-term) and the type of service requested (e.g., firm point-to-point, non-firm point-to-point or network service). The Commission also will require transmission providers to post their underlying load forecast assumptions for all ATC calculations and, to post on a daily basis, their actual daily peak load for the prior day. The Commission directs transmission providers to work through NAESB to develop standards for consistent methods of posting the new requirements on OASIS.

1162 Accordingly, to provide greater availability of redispatch information, the Commission adopts certain additional posting requirements for transmission providers. Specifically, we direct each transmission provider to post on OASIS its monthly average cost of redispatch for each internal congested transmission facility or interface over which it provides redispatch service using planning redispatch or reliability redispatch under the pro forma OATT.[6] Additionally, to

[6] The relevant reliability redispatch costs for posting purposes are those costs the transmission provider invoices network customers based on a load ratio share pursuant to section 33.3 of the pro forma OATT.

demonstrate the range of redispatch costs each month, the Commission directs transmission providers to post a high and low redispatch cost for the month for each of these same transmission constraints. The transmission provider shall calculate the monthly average cost in $/MWh for each congested transmission facility by dividing monthly total redispatch costs (at the facility) by the total MWhs that would otherwise be curtailed (at the facility) in the month absent the redispatch.[7] Transmission providers shall post internal constraint or interface data for the month if any planning redispatch or reliability redispatch is provided during the month, regardless of whether the transmission customer is required to reimburse the transmission provider for those exact costs. Thus, if the transmission customer pays for redispatch pursuant to a negotiated fixed rate, the transmission provider is required to post and calculate the monthly average redispatch costs and the high and low costs in the month even though the transmission provider will bill the customer the fixed rate. The same posting requirement applies if the customer is paying a monthly "higher of" rate.[8] The transmission provider shall post this data on OASIS as soon as practical after the end of each month, but no later than when it sends invoices to transmission customers for redispatch-related services. We direct transmission providers to work in conjunction with NAESB to develop this new OASIS functionality and any necessary business practice standards.

1318 We agree, however, with EEI's recommendation that the Commission delegate to NAESB the responsibility for developing the Standard and Communications Protocols, business practices and OASIS modifications that will be necessary to provide the performance metrics adopted above. NAESB is in the best position to develop the standards and the processes by which the performance metrics are posted.

1378 We interpret Exelon's request that we require all transmission providers to allow transmission customers to link consecutive requests for firm point-to-point transmission service and to evaluate such requests as a single request as asking us to (1) allow transmission customers to require the transmission provider to either grant service for the entire period, deny service for the entire period, or offer the same partial quantity for the entire period and (2) require the transmission provider to consider the full duration of the linked requests when determining reservation priority pursuant to sections 13.2 of the pro forma OATT (short-term firm point-to-point transmission service). We require transmission providers working through NAESB to develop business practice standards to allow a transmission customer to rebid a counteroffer of partial service so the transmission customer is allowed to take the same quantity of service across all linked transmission service requests. Transmission providers need not implement these business practice standards until NAESB develops appropriate standards. We note that the transmission customer should not be required to

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The transmission provider need not perform new calculations of out-of-merit dispatch costs; rather the reliability redispatch invoices should form the basis of information from which the transmission provider determines monthly average reliability redispatch costs.

[7] For example, if reliability redispatch is used by the transmission provider to prevent curtailment of 10 MW of transmission provider or network customer load for 5 hours during the month across flowgate A, the transmission provider would use 50 MWh as the divisor to determine the monthly average cost of redispatch for flowgate A.

[8] This is not a new calculation for the transmission provider because the transmission provider must determine the redispatch costs to know whether to charge higher of the embedded rate or the redispatch costs.

take the same quantity of service across consecutive transmission service requests, it should simply have the option to do so. On the second issue, we reiterate that, according to existing NAESB business practice standard 001-4.16, the transmission provider is required to consider the full duration of the linked requests when determining reservation priority pursuant to section 13.2 of the pro forma OATT.

1392 Commenters also suggest changes to the OASIS protocols, including prohibiting transmission customers from changing a request into a pre-confirmed request and requiring OASIS platforms to be accessible on non-Windows/Explorer computers. We believe these issues are best addressed by NAESB.

1401 The Commission generally agrees with those commenters that argue that giving a priority to pre-confirmed requests can increase the efficient utilization of the system by giving priority to customers who are committed to purchase service over those who have not so committed, including customers that submit multiple requests without any intent to take service if each request is granted. However, we are mindful of concerns that doing so could undermine the Commission's desire to promote longer-term uses of the transmission system, disrupt the study process, or disadvantage transmission customers that are not in the position to pre-confirm their requests. As a result, we will modify the NOPR proposal and give priority only to pre-confirmed non-firm point-to-point transmission service requests and short-term firm point-to-point transmission service requests. In addition, longer duration requests for transmission service will continue to have priority over shorter duration requests for transmission service, with pre-confirmation serving as a tie-breaker for requests of equal duration. This policy will still give an advantage to pre-confirmed requests without imposing substantial implementation difficulties or undermining the Commission's goals to encourage longer-term uses of the transmission system. Our revised policy on priority for pre-confirmed requests thus addresses the comments that we should preserve the priority of longer duration requests for transmission service over shorter duration requests for transmission service. For instance, a pre-confirmed daily or hourly request will not preempt a weekly request that has not been pre-confirmed. Pre-confirmed short-term service requests therefore will not have a priority superior to that of long-term service requests that have not been pre-confirmed.

In the FERC Order 890-A under Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 dated December 28, 2007, the Commission made the following conclusions relevant to this recommendation:

142 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission service. While the affiliate posting requirements do not apply to RTOs and ISOs,[9] the requirement to post metrics regarding all transmission service requests remains.[10] We agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission service request

[9] See Order No. 890 at P 414.
[10] See 18 CFR 37.6(i)(1) and (2).

metrics improves the transparency of transmission service request processing by those transmission providers.

718 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission service. While the affiliate posting requirements do not apply to RTOs and ISOs,[11] the requirement to post metrics regarding all transmission service requests remains.[12] We agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission service request metrics improves the transparency of transmission service request processing by those transmission providers.

720 We also affirm the decision to require any transmission provider that processes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines in the pro forma OATT for two consecutive quarters to submit a notification filing to the Commission and post additional performance metrics. We disagree with Washington IOUs that transmission providers should be required to post these metrics only after Commission action on a notification filing. Posting of these additional metrics is not required until two months after the notification filing, giving the Commission time to consider the extenuating circumstances that prevented the transmission provider from processing requested studies on a timely basis. If, upon review of such a filing, the Commission finds that delays were caused by extenuating circumstances, the Commission will not require the transmission provider to continue to post the additional performance metrics. As a result, we expect transmission providers with legitimate extenuating circumstances should not have to post any additional metrics.

721 Similarly, we decline to exempt, as a general matter, studies that are delayed by customer agreement or that are associated with resource planning. The transmission provider can explain the circumstances surrounding any particular delay in its notification filing, which the Commission will review on a case-by-case basis. The process adopted in Order No. 890 is sufficiently flexible to relieve any transmission provider who completes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines for two consecutive quarters from any additional posting requirements, or operational penalties, if the Commission finds the delays were due to extenuating circumstances.

722 The Commission grants rehearing to make several typographical revisions to our rules implementing these posting requirements. In Order No. 890, the Commission stated that short-term and long-term requests for point-to-point service must be aggregated for purposes of the posting requirement in order to ease the burden on transmission providers and in recognition that many customers requesting short-term point-to-point service are unwilling to pay for studies.[13] The accompanying regulations, however, stated that transmission providers must separately calculate and post metrics for long-term and short-term requests.[14] Upon further consideration, we believe it appropriate to allow, but not require,

[11] See Order No. 890 at P 414.
[12] See 18 CFR 37.6(i)(1) and (2).
[13] See id. at P 1309.
[14] 18 CFR 37.6(h)(1).

transmission providers to aggregate requests for long-term and short-term point-to-point service for purposes of the posting requirements. We also clarify that the posting requirements apply to all requests for service, including requests for point-to-point service and requests to designate new network resources or loads. We have revised our regulations to make these requirements more clear.

766 The Commission affirms the decision in Order No. 890 to rely on the NAESB process to develop business practices to govern the processing of transmission requests across multiple transmission systems. We decline to dictate at this time, beyond those principles outlined in Order No. 890, the particular practices that must be implemented. It is more appropriate to allow transmission providers working through NAESB, in the first instance, to consider how best to ensure coordination across multiple systems. It is also appropriate to give NAESB an open timeframe to develop these standards since they must be broad enough to account for the complexities of coordinating multi-system transmission service requests.[15]

786 The Commission affirms the decision in Order No. 890 to give priority based on pre-confirmed status only to short-term firm and long-term non-firm requests for service. As the Commission explained in Order No. 890, the Commission was mindful that the pre-confirmation process could disrupt the transmission study process, undermine longer-term uses of the transmission system, or disadvantage transmission customers that are not in a position to pre-confirm their requests. Restricting the scope of transmission service requests receiving priority for pre-confirmation status to short-term firm and long-term non-firm service requests is necessary in order to minimize disruptions with existing study procedures and power procurement practices in place for long-term firm service requests. We believe this appropriately balances the need to promote long-term transmission rights against the need for increased certainty for customers seeking shorter-term firm and non-firm service.[16] *Similarly, we decline to alter the Commission's long-standing policy of giving longer duration requests for service priority over shorter duration requests. To do so would undermine the Commission's goal of encouraging longer term uses of the transmission system.*

787 We clarify in response to E.ON U.S. that, in the event an offer for service on a pre-confirmed request can only be accommodated by additions to the transmission provider's transmission system, the transmission customer may: (1) take a shorter term of service, if available; (2) agree to undertake any upgrades that may be necessary to accommodated the transmission requests; or (3) decline service. The Commission rejects Tenaska's proposal to adopt a deadline prior to which a transmission customer may withdraw a pre-confirmed transmission service request. Providing an opportunity to pre-confirm applications is intended to reduce overloading of transmission study queues and minimize the amount of transmission requests later withdrawn from the study

[15] NAESB has indicated that business practices governing the coordination of service requests across multiple transmission systems are in development. The Commission requests NAESB to keep us informed regarding the status of developing these and other business practices.

[16] As we explain in section III.D.2.c, a customer exercising a rollover right is only required to match a bona fide competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract.

queue, increasing the efficiency of processing transmission service requests. Allowing transmission customers to withdraw pre-confirmed transmission service requests without reason or penalty as suggested by Tenaska would undermine the very reason pre-confirmation status has been given a priority.

788 We decline Southern's request to extend the effectiveness of the reforms regarding pre-confirmation priority pending development of related business practices by NAESB. We believe that Order No. 890 provides sufficient guidance for transmission providers to implement this priority in advance of any standardization efforts that may be undertaken through the NAESB process.

789 With respect to TranServ's question regarding application of the right of first refusal for eligible customers with requests for service over multiple days, the Commission clarifies that a competing request must exceed the total term of service in order to trigger the right of first refusal. Thus, in order for a competing request of equal price to preempt a reservation for three conservative days of daily service, that request must be for four consecutive days or longer and must be received at least one day before the first day of the original customer's three-day term of service.

790 Upon review of tariff provisions governing pre-confirmation of transmission service requests, the Commission has determined that the language adopted in Order No. 890 did not fully capture the Commission's intent of allowing all eligible customers the opportunity to pre-confirm short-term firm and non-firm reservations. As currently written, the language of sections 1.39, 17.2 and 18.2 of the pro forma OATT make pre-confirmation available only to those that are already transmission customers, rather than all eligible customers. The Commission has revised those sections of the pro forma OATT to more accurately reflect our intent that pre-confirmation service should be available to all eligible customers seeking short-term firm and non-firm transmission services.

WEQ 2008 Annual Plan Item 2.a.i.5

Re-Bid Of Partial Service Business Practice Standards on a Single Transmission Provider's System associated with S&CP Requirements

WEQ 2008 Annual Plan Items 2.a.i.6

Preconfirmation Priority Business Practice Standards associated with S&CP Requirements

WEQ 2008 Annual Plan Items 2.a.ii.1-3

Group 2: Metrics; Redispatch Cost Posting

1. *Metrics Related to Provision of Transmission Service (Paragraph 413 of Order 890)*
2. *Metrics Related to Performance of Transmission Studies (Paragraphs 1308 through 1317 of Order 890*
3. *Redispatch Cost Posting*
   - *Monthly average cost of redispatch*
   - *A high and low redispatch for the month*

b. Description of Recommendation:

c. Business Purpose:

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Please review the following ESS/ITS Subcommittee meeting minutes:

November 8, 2007

November 20, 2007

December 6, 2007

December 18, 2007

January 15-16, 2008

January 31, 2008

February 11-12, 2008

Please review the Motions Document:
http://www.naesb.org/pdf3/weq_ess_its021108a2.doc

Rationale for not allowing increase capacity on re-bids in WEQ-001-4.10.2:

NAESB felt that allowing a customer to request additional capacity as part of the re-bid of partial service capability on OASIS represented a substantive change in the service requested that could require additional studies, etc and should be addressed through submission of an additional request for capacity and new queue position.

Table 4-3 and limitation on pre-emption to require competing requests to be preconfirmed:

NAESB has limited the competition between a confirmed reservation and a pending request of longer duration or equal duration and higher price (short-term firm only) to require that the pre-empting request must be pre-confirmed. We base this decision in part on the Commission's determination "…in section III.D.2.c, a customer exercising a rollover right is only required to match a *bona fide* competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract." We feel extending the same protection for existing confirmed short-term firm or non-firm reservations to only be at risk for preemption and the requirement to

exercise ROFR where there is a "*bona fide* competing commitment", and that such commitment must be provided by the customer's submission of the competing request as pre-confirmed.

A minority opinion was expressed that the "*bona fide* competing commitment "could be met by having the TP and competing customer complete all negotiations and confirm the competing request contingent on all confirmed reservations that will be preempted opting to not match the duration of the competing request. At that point the TP extends the ROFR to the request(s) to be pre-empted. To the extent some existing customers may match and others may not, the competing request would be subject to full or partial displacements based on the amount of capacity that was retained through ROFR by the original customers. This process would NOT require submission of a longer duration request as preconfirmed to be considered a competing request with preemption of confirmed shorter duration reservations.This was found unpalatable by the majority because of the negative ATC during the pendency of the competing request(s) and queue management issues this would raise.

Removal of Standard WEQ-001-4.26:

Order 890 and 890-A have granted pre-confirmation status a higher priority than price. This coupled with revisions to Table 4.3 to require preempting requests to be pre-confirmed warranted removal of WEQ-001-4.26.

(Clean)

RECOMMENDED STANDARDS:

Add the following language to the Introduction section of WEQ-001:

Introduction

In the event of a conflict between these business practices and the Primary Provider's Tariff, the Tariff shall have precedence.

The following proposed additions are to be included in the WEQ-001 Definition of Terms. The specific enumeration for each of these definitions will be established by NAESB Staff after ratification.

001-0.xx **Control Area** – As used in NAESB Standards, shall be synonomous with the NERC definition for the Balancing Authority Area.

001-0.yy **Partial Service** - transmission service offered or granted by a Transmission Provider that is for a shorter duration than requested (start-time through stop-time), less capacity than requested, or both.

The following are proposed redlined changes and additions to WEQ-001-2 Standard Terminology for Transmission and Ancillary Services

001-2.1.9 Sliding Yearly

The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year.

For example SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

001-2.1.13 Extended Yearly

The service starts at 00:00 of any date and stops at 00:00 more than one year later.

The Transmission Provider may limit the service to be in increments of full years or full calendar months.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

Other Service Attribute Values

Seven ancillary services are pre-defined. Other services may be offered pursuant to filed tariffs.

001-2.5.4 Energy Imbalance Service (EI) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour and in accordance with Schedule 4 of the pro forma tariff.

…

001-2.5.7 Generator Imbalance Service (GI) - is provided when a difference occurs between the output of a generator located in the Transmission Provider’s Control Area and a delivery schedule from that generator to (1) another Control Area or (2) a load within the Transmission Provider’s Control Area over a single hour and in accordance with Schedule 9 of the pro forma tariff.

The following are proposed redlined changes and additions to WEQ-001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4.1 All reservations and price and/or capacity negotiations shall be conducted on OASIS.

Phase IA Negotiation Process State Transition Diagram

The NAESB OASIS Implementation Guide (WEQ-013) provides a process state diagram to define the Transmission Customer and Transmission Provider interactions for negotiating transmission service. This diagram defines the allowable steps in the reservation request, negotiation, approval, confirmation and post-confirmation processes.

001-4.4 RESERVED

001-4.5 RESERVED

Negotiations Without Competing Bids

The following practices are defined in order to enhance consistency of the reservation process across OASIS nodes.

001-4.6 A Transmission Provider/Seller shall respond to a Transmission Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-2 Reservation Timing Requirements.** The time limit is measured from the time the OASIS Transmission request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

I. INVALID
II. DECLINED
III. REFUSED
IV. COUNTEROFFER
V. ACCEPTED
VI. RECEIVED or STUDY (leading to REFUSED, DECLINED, COUNTEROFFER, or ACCEPTED).

001-4.7 Prior to setting a request to ACCEPTED, COUNTEROFFER, or REFUSED a Transmission Provider shall evaluate the appropriate resources and ascertain that the requested transfer capability is (or is not) available.

001-4.7.1 If the Transmission Provider determines there is insufficient transfer capability available to grant the Transmission Customer's request and there is no obligation to provide Partial Service (or Partial Service is also not available in cases where the Transmission Provider is obligated to

provide Partial Service), the Transmission Provider may respond by setting the request status to REFUSED.

001-4.7.2 If the Transmission Provider determines there is sufficient transfer capability available to grant the Transmission Customer's request and the customer's bid price is at least equal to the provider's current posted offer price over time and all other Transmission Provider requirements have been met, the Transmission Provider shall respond by setting the request status to ACCEPTED.

001-4.7.2.1 If the Transmission Customer does not specify a bid price, the Transmission Provider shall consider the bid price to be equal to the current posted offer price when evaluating the request.

001-4.7.3 The Transmission Provider shall use the status of COUNTEROFFER to initiate the negotiation of requested capacity (Partial Service) and/or price.

001-4.7.3.1 The Transmission Provider is not required to provide short-term Partial Service in response to a Long-Term request.

001-4.7.3.2 If the available transfer capability can support only a portion of the total capacity requested by the Transmission Customer and the Transmission Provider is obligated or elects to offer what limited capability is available to the customer, the Transmission Provider shall notify the Transmission Customer on OASIS by setting the amount of capacity being offered over time in the transmission request and updating the request status to COUNTEROFFER.

001-4.7.3.3 If the Transmission Customer is attempting to negotiate price by submission of a bid price that is lower or higher than the current posted offer price, and the Transmission Provider elects to not negotiate price, the Transmission Provider shall notify the customer by setting the request status to DECLINED.

001-4.7.3.4 If the Transmission Provider elects to continue to negotiate price, the Transmission Provider shall update the offer price over time in the transmission request, indicate whether the price being negotiated is higher or lower than the posted price, and set the request status to COUNTEROFFER.

001-4.7.3.5 If both capacity and price are being negotiated, that negotiation may be performed simultaneously.

001-4.8 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

001-4.9 The Transmission Customer may change a request from QUEUED, RECEIVED, STUDY, COUNTEROFFER, REBID, or ACCEPTED to WITHDRAWN at any time prior to CONFIRMED except as follows.

001-4.9.1 Preconfirmed requests for short-term firm and non-firm point-to-point service shall not be allowed to be WITHDRAWN by the Transmission Customer unless counteroffered by the Transmission Provider, after which the Transmission Customer shall be allowed to withdraw the request.

001-4.9.2 For a preconfirmed request for short-term firm point-to-point service, if the Transmission Provider has notified the Transmission Customer that a System Impact Study is needed, the Transmission Customer may, prior to execution of the System Impact Study Agreement, request that the Transmission Provider void (status of DECLINED) the request. The Transmission Provider must honor such request.

001-4.9.3 In cases of inadvertent error, the Transmission Customer may in the very near term request that the Transmission Provider void (status of ANNULLED) a pre-confirmed request/reservation for short-term firm or non-firm point-to-point service. Honoring such a request is at the discretion of the Transmission Provider.

001-4.10 From ACCEPTED or COUNTEROFFER, a Transmission Customer may change the status to CONFIRMED, REBID or WITHDRAWN. The Transmission Customer has the amount of time designated as Customer Confirmation Time Limit in Table 4-2 Reservation Timing Requirements to change the state of the request to CONFIRMED. The Customer Confirmation Time Limit is measured from the first time the request is moved to ACCEPTED or COUNTEROFFER, and is not reset with subsequent iterations of negotiation.

001-4.10.1 The Transmission Customer shall use the request status of REBID to initiate or continue the negotiation of price and/or capacity.

001-4.10.2 The Transmission Customer may negotiate for a lower amount of transmission capacity by updating the capacity requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID. For example, the Transmission Customer may choose to coordinate the level of transmission service purchased across multiple Transmission Providers or other such purposes. Negotiation for a higher amount of transmission capacity shall not be allowed. A Transmission Customer seeking additional capacity must submit a new request which will be assigned a new queue position.

001-4.10.3 The Transmission Customer may negotiate for a higher or lower price by updating the bid price requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID.

001-4.10.4 The Transmission Customer shall positively acknowledge and agree to both the price and capacity over time by setting the bid price and requested capacity equal to the Transmission Provider's offer price and granted capacity prior to confirmation of the transmission service request.

001-4.12 Should the Transmission Customer elect to initiate or continue the negotiation of price and/or capacity by moving a transmission service request to REBID, the Transmission Provider shall respond by taking the request to a DECLINED, SUPERSEDED, ACCEPTED, or COUNTEROFFER state within the Provider Counter Time Limit, specified in **Table 4-2 Reservation Timing Requirements.** The Transmission Provider response time is measured from the most recent REBID time.

001-4.12.1 The Transmission Provider shall positively acknowledge and agree to both the price and capacity over time by setting the offer price and granted capacity equal to the Transmission Customer's bid price and requested capacity prior to acceptance of the transmission service request.

001-4.13 The following timing requirements shall apply to all Point-to-Point transmission service requests:

TABLE 4-2
Request Timing Requirements

Class	Service Increment	Time QUEUED Prior to Start	Provider Evaluation Time Limit[1]	Customer Confirmation Time Limit[2] after ACCEPTED or COUNTEROFFER[3]	Provider Counter Time Limit after REBID[4]
Non-Firm	Hourly	<1 hour	Best effort	5 minutes	5 minutes
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes	10 minutes
Non-Firm	Daily	N/A	30 minutes	2 hours	10 minutes
Non-Firm	Weekly	N/A	4 hours	24 hours	4 hours
Non-Firm	Monthly	N/A	2 days [5]	24 hours	4 hours
Firm	Daily	< 24 hours	Best effort	2 hours	30 minutes
Firm	Daily	N/A	30 days[6]	24 hours	4 hours
Firm	Weekly	N/A	30 days[6]	48 hours	4 hours
Firm	Monthly	N/A	30 days[6]	4 days	4 hours
Firm	Yearly	60 days [7]	30 days	15 days	4 hours

Notes for Table 4-2:

[1] Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.

[2] Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override pre-exemption deadlines.

[3] Measurement starts at the time the request is first moved to either ACCEPTED or COUNTEROFFER. The time limit does not reset on subsequent changes of state.

[4] Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.

[5] Days are defined as calendar days.

[6] Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers shall make best efforts to respond within 72 hours, or prior to the scheduling deadline, whichever is earlier, to a request for Daily Firm Service received during period 2-30 days ahead of the service start time.

[7] Subject to Section 17.1 of the pro forma tariff, whenever feasible and on a nondiscriminatory basis, Transmission Providers should accommodate requests made with less than 60 days notice.

Negotiations with Competing Bids for Constrained Resources

001-4.14 The following are the relative queue priorities of Service Request Tiers[17]. The priorities refer only to negotiation of service and do not refer to curtailment priority.

001-4.15 Reservations and requests shall be handled in a first-come-first-served order based on QUEUE_TIME. Within a given Service Request Tier, with the exception of Service Request Tier 1, where there are competing requests for a constrained resource, the following request attributes shall be used to determine the relative priority for granting of service.

I. ..... Service Increment (Monthly, Weekly, Daily, Hourly)
II. ..... Duration (the amount of time between the Start Date and the Stop Date)
III ..... Pre-confirmation Status
IV…… ..Price
V……..Queue Time

001-4.16 Table 4-3 describes the relative queue priorities of competing service requests and reservations, with respect to the conditions whereby a subsequent request preempts a previously queued request or reservation, and the rules for offering right-of-first-refusal. If two competing requests do not meet the specific criteria listed in Table 4-3, the requests shall be evaluated and processed in a first-come-first-served order based on QUEUE_TIME. While the table indicates the relative priorities of two competing requests, it also is intended to be applied in the more general case of more than two competing requests.

Table 4-3
Priorities For Competing Reservations And Requests

[1]Note: The term Tier is introduced to avoid confusion with existing terms such as TS_CLASS.

ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
1	Tier 1: Long-term Firm, Native Load, and Network Firm	N/A - Not preempted by a subsequent request.	N/A
2	Tier 2: Pending (not confirmed) or confirmed but conditional Short-term Firm	Tier 1: Long-term Firm, Native Load, and Network Firm, Once Request 1 is unconditional, it may not be preempted.	No
3a	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment.	No
3b	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	No
3c	Tier 2: Pending pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] but higher price	No
3d	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	No
3e	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment and of equal or longer duration[1]	No
3f	Tier 2: Confirmed but conditional[2] Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	Yes
3g	Tier 2: Confirmed but conditional[2] Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	Yes
3h	Tier 2: Confirmed but conditional[2] Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] but higher price.	Yes
4	Tier 3: Network Service From Non-Designated Resources	Tiers 1 and 2: All Firm (including Network).	No
5	Tier 4: All Non-Firm PTP	Tiers 1 and 2: All Firm (including Network).	No
6	Tier 4: All Non-Firm PTP	Tier 3: Network Service from Non-Designated Resources.	No
7	RESERVED		

ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
7a	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment.	No
7b	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	No
7c	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration but higher price	No
7d	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment	No
7e	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment and of equal or longer duration[1]	No
7f	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration but higher price	No
7g	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm of higher service increment	Yes
7h	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	Yes
8	RESERVED		
9	Tier 5: Non-firm PTP Service over secondary receipt and delivery points.	Tiers 1 through 4	No
10	Tier 6: Non-firm Next Hour Market Service	Tiers 1 through 5	No

Notes for Table 4-3:

[1] Longer duration means more multiples of the same SERVICE_INCREMENT in a single request. Each such multiple must be at the same level of capacity. For example, a single request for three consecutive days shall be considered longer duration than a single request for two consecutive days. Also, multiple service requests or reservations may not be grouped for the purpose of determining duration. For example, three separate one-day requests for three consecutive days of service shall not be considered longer duration than a single request for two consecutive days.

[2] Short term firm reservations that are conditional as defined in Section 13.2 of the pro forma tariff.

001-4.17 For a request or reservation that is SUPERSEDED or DISPLACED, respectively, the Transmission Provider must indicate the Assignment Reference Number of the competing request and the reason for denial of service in the SELLER_COMMENTS field.

001-4.18 Given competing requests for a constrained resource when a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from any pending (not confirmed) state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-3. These state changes require dynamic notification to the Transmission Customer if the Transmission Customer has requested dynamic notification on OASIS.

001-4.26 RESERVED

001-4.27 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

The following are proposed additions to the WEQ-001 OASIS Standards

001-13 OASIS GENERAL POSTING STANDARDS

001-13.1 OASIS HOME PAGE

The Transmission Provider shall establish the following HTML hyperlinks to standardized information postings of a general (i.e., non-template) nature located on the Transmission Provider's OASIS Home Page at their registered OASIS URL address. These links must appear as named and in the following order:

NAESB Home Page

Standards of Conduct

Performance Metrics

Business Practices, Waivers, and Exemptions

ATC Information

Nothing in this standard shall preclude the Transmission Provider from establishing additional hyperlinks or making additional content available on their OASIS Home Page.

In the case where a Transmission Provider has one or more Transmission Owners who are subject to the Standards of Conduct posting requirements, the Transmission Provider will provide links to such postings on each of the individual Transmission Owner's website. The information posted on the individual Transmission Owner's website shall be posted according to WEQ-001-13.1.2.

001-13.1.1 NAESB HOME PAGE LINK

The "***NAESB Home Page"*** hyperlink shall direct an OASIS user to the NAESB Home Page.

001-13.1.2 STANDARDS OF CONDUCT LINK

The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g,* Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g,* Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the "***Standards of Conduct***" link displayed on the Transmission Provider's OASIS Home Page.

Emergency Circumstances Deviations (§358.4(a)(2))

Marketing and Energy Affiliate List (§358.4(b)(1))

Shared Facilities (§358.4(b)(2))

Organizational Charts and Job Descriptions (§358.4(b)(3)(i))

Common Employees (§358.4(b)(3)(iii))

Potential Merger Partners (§358.4(b)(3)(v))

Transfers[18] (§358.4(c))

Information Disclosure[19] (§358.5(b) (3))

Voluntary Consent to Share Non-Affiliated Customer Information (§358.5(b)(4))

Discretionary Actions under Tariff [20] (§358.5(c)(4))

Discounts[21] (§358.5(d))

Chief Compliance Officer (§358.4(e)(6))

Written Procedures for Implementation (§358.4 (e)(3))

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to Standards of Conduct. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to WEQ 002-3.1

[18] According to WEQ 002-4.3.10.4 a template is required for this item.
[19] According to WEQ 002-4.3.10.6 a template is required for this item.
[20] According to WEQ 002-4.3.10.5 a template is required for this item.
[21] According to WEQ 002-4.3.2.1 a template is required for this item.

001-13.1.3 PERFORMANCE METRICS LINK

The following types of information, as required by FERC Statutes and Regulations (18 CFR 37.6(h), 18CFR 37.6(i), and 18 CFR 37.6(j)(2)) shall be accessible from the ***"Performance Metrics"*** link.

a. The Transmission Provider shall establish a link entitled ***"Transmission Study Metrics"*** to view the information as required by 18 CFR 37.6(h), Posting and retention requirements for this information are addressed in WEQ-001-1.6(h)(2) and (4).

b. The Transmission Provider shall establish a link entitled ***"Transmission Service Request Metrics"*** to view the information as required by 18 CFR 37.6(i). The information must be made available on a monthly basis and be posted by the 15th day of the subsequent month. The information must remain available for download on OASIS for three months after its posted date. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

c. The Transmission Provider shall establish a link entitled ***"Redispatch Cost"*** to view the information as required by 18 CFR 37.6(j)(2). The data must be made available on a monthly basis and be posted as soon as practical after the end of each month, but no later than when the invoice for redispatch-related services is sent to the Transmission Customer. The information must remain available for download on OASIS for three months after its posted date. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

001-13.1.4 BUSINESS PRACTICES, WAIVERS, AND EXEMPTIONS LINK

The Transmission Provider shall post information related to 1) any Transmission Provider-specific business practices, 2) any waivers or exemptions granted from any of the OASIS requirements or standards, and 3) any other pertinent information related to the conduct of business with the Transmission Provider.

001-13.1.5 ATC INFORMATION LINK

The following are proposed redlined changes to WEQ-002-3.4 PROVIDER UPDATING REQUIREMENTS

002-3.4 PROVIDER UPDATING REQUIREMENTS

The following are the Provider update requirements:

a. **Provider Posting of TS Information**: Each Provider (including Secondary Providers and Value-Added Providers) shall be responsible for writing (posting) and updating TS Information on their OASIS Node. No User shall be permitted to modify a Provider's Information.

b. **General Postings**

(i) **INFO.HTM:** Each Provider shall provide general information on how to use their node and describe all special aspects, such as line losses, congestion charges and assistance. The address for the directory of this information shall be INFO.HTM (case sensitive), an HTML web page, linked to the Provider's registered URL address. See WEQ 002-4.5 for information required to be on the web page INFO.HTM.

(ii) **OASIS Home Page:** NAESB Standard WEQ-001-13 establishes specific HTML hyperlinks which must be made available on the Transmission Provider’s OASIS home page at their registered URL address.

…

The following are redlined changes to WEQ-002-4.5 GENERAL POSTINGS

002-4.5 GENERAL POSTINGS

002-4.5.1 INFO.HTM

When a regulatory order requires informational postings on OASIS and there is no OASIS S&CP template to support the postings or it is deemed inappropriate to use a template, or the location of the posting has not been specified in WEQ-001-13, there shall be a reference in INFO.HTM to the required information, including, but not limited to, references to the following:

- A common source of interconnection wide curtailment and interruption information, such as the NERC Transmission Loading Relief (TLR) web site.
- The location of the list of system studies conducted.
- Information on requesting the text file of the tariffs and service agreements.

For the purposes of this section, any link to required informational postings that can be accessed from INFO.HTM would be considered to have met the OASIS posting requirements, provided that the linked information meets all other OASIS accessibility requirements.

002-4.5.2 OASIS Home Page The NAESB WEQ-001-13 Standards establishes specific informational postings that must be accessible from the Transmission Provider's OASIS Home Page.

The following are proposed redlined changes to WEQ-013-2.2 Transaction Status to reflect the addition of WEQ-001- 4.9.3. Note: The definition of ANNULLED for the Data Dictionary Element Name Status will also be changed to reflect the addtion of WEQ-001- 4.9.3.

013-2.2 Transaction Status

ANNULLED = assigned by the Seller when, by mutual agreement with the Customer, a reservation or pre-confirmed request is to be voided, or assigned unilaterally by the Primary Provider when a resale reservation is to be voided. (Final state).

To: NAESB Office; WEQ Executive Committee Chairs

From: Barbara Rehman, Bonneville Power Administrative

Subject: Additional Minor Corrections
ATC Information Link, 2008 AP Item 2.b.vii, WEQ-001 changes for "ATC Information Link" on OASIS and TTC and ATC methodologies and values

Date: June 20, 2008

During a review of the above Recommendation currently out for member ratification, it was determined that there is a need for additional minor corrections, as set forth below:

(Redline)

001-13.1.5 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC or AFC, that information shall be found in the CBM Implementation Document – CBMID or TRM Implementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links:

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC or AFC Methodology Contact (as required by WEQ-001-xx), as applicable,
    - o Transmission Provider
    - o Transmission Operator for TTC or TFC questions or concerns associated with Joint/Mulitiple Ownership Facilitie-s
- Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5 [*"n" represents 2008 WEQ Annual Plan Item 2.b.vii]*)

001 – XX.1 **Procedure for Addressing ATC or AFC Methodology Questions**

The Transmission Provider shall respond to questions related to the applicable ATC of AFC methodologies, including but not limited to derivation of values, underlying assumptions or data inputs within one week of the receipt by the Transmission Provider's ATC or AFC Methodology Contact and shall respond to the question or shall provide an estimate of the amount of time needed to respond. Such questions must be submitted to the contact specified by the

Transmission Provider 's contact information under the ATC Information Link as specified under WEQ- 001-13.1.5.

(Clean)

001-13.1.6 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC or AFC, that information shall be found in the CBM Implementation Document – CBMID or TRM Implementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links:

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC or AFC Methodology Contact (as required by WEQ-001-xx), as applicable,
    - Transmission Provider
    - Transmission Operator for TTC or TFC qu;estions or concerns associated with Joint/Mulitiple Ownership Facilities
- Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5 [*"n" represents 2008 WEQ Annual Plan Item 2.b.vii]*)

001 – XX.1 **Procedure for Addressing ATC or AFC Methodology Questions**

The Transmission Provider shall respond to questions related to the applicable ATC of AFC methodologies, including but not limited to derivation of values, underlying assumptions or data inputs within one week of the receipt by the Transmission Provider's ATC or AFC Methodology Contact and shall respond to the question or shall provide an estimate of the amount of time needed to respond. Such questions must be submitted to the contact specified by the Transmission Provider 's contact information under the ATC Information Link as specified under WEQ- 001-13.1.5.

To: NAESB Office; WEQ Executive Committee Chairs

From: Paul R. Sorenson, Open Access Technology International, Inc.

Subject: Minor Corrections to NAESB Standards WEQ-002 and WEQ-003 *(Attachments to 2007 WEQ Annual Plan Item 2(ii) Final Action – Ratified February 29, 2008)*

Date: June 19, 2008

The following red-lined changes are recommended as minor corrections to the WEQ-002, WEQ-003 and WEQ-013 NAESB Standards. In addition to minor typographical errors, these corrections are required to reinstate a template data element in the ***systemdata*** template which was inadvertently omitted in preparation of the final ratified standards documents. A review of the pre-ratification red-lined documents posted for review and comment will show that these data elements were present.

Business Practices for Open Access Same-Time Information Systems (OASIS) Standards & Communication Protocols Version 1.5

Correction to 002-2.3:

002-2.3 COMMUNICATION STANDARDS REQUIRED

a. **Point-to-Point Protocol (PPP) and Internet Protocol Control Protocol (IPCP)** (reference RFCs 1331 and 1332) shall be supported for private internet network dial-up connections.

b. **Serial Line Internet Protocol (SLIP)** (reference RFC 1055) shall be supported for private internet network dial-up connections.

c. **Transport Control Protocol and Internet Protocol (TCP/IP)** shall be the only protocol set used between OASIS Nodes whenever they are directly interconnected, or between OASIS Nodes and Users using private leased line internet network connections.

d. **Hyper Text Transport Protocol (HTTP)**, Version 1.1 (RFC 2616), shall be supported by TSIPs so that User's= web browsers can use it to select information for viewing displays and for downloading and uploading files electronically.

e. **Internet Protocol Address:** All OASIS Nodes are required to use an IP address registered with the Internet Network Information Center (InterNIC), even if private connections are used.

Correction to 002-4.2.1.3:

002-4.2.1.3 Script Names

Common Gateway Interface (CGI) scripts shall be located in the directory "data" as follows (case sensitive): **http://(OASIS Node name)/OASIS/ (PRIMARY_PROVIDER_CODE) /data/(cgi script name)?(Query Variables)**

Where:

(**cgi script name**) is the OASIS Template name in lower case (see Section 4.3). Other cgi scripts may be defined as required to implement the HTML interface to the documented Templates.

(**Query Variables**) is a list of query variables with their settings formatted as defined by the HTTP protocol (i.e., URL encoded separated by ampersands).

Example:

To request the hourly schedule Template at Primary Provider WXYZ Co.

http://www.wxyz.com/OASIS/WXYZ/data/schedule ?templ=schedule&
ver=1.~~2~~5& fmt=data &stime=19960412040000PD
&sptime=19960412100000PD& pprov=wxyz

Correction to 002-4.2.7.2 and 002-4.2.7.3 (consistent with notation in 002-4.2.10.3.1:

002-4.2.7.2 Input Header Records

The following standard header records are required for the uploading of Input data for all Input/Response OASIS Templates:

VERSION=~~1.4~~nn.n↵
TEMPLATE=aaaaaaaaaa↵
OUTPUT_FORMAT=DATA↵
PRIMARY_PROVIDER_CODE=aaaa↵
PRIMARY_PROVIDER_DUNS=nnnnnnnnn↵
RETURN_TZ=tz↵
DATA_ROWS=nnn↵
COLUMN_HEADERS=[Template Data Element names separated by commas] ↵

The format of the value associated with each of the Input header record Data Elements are dictated by the Data Dictionary. The value associated with the DATA_ROWS Data Element shall define the total number of Data Records that follow in the message after the COLUMN_HEADERS record. The COLUMN_HEADERS record defines, by Data Element name, the data associated with each comma separated column contained in each subsequent Data Record (row). On Input, either the Data Element's full name or alias listed in the Data Dictionary may be specified.

002-4.2.7.3 Response Header Records

When explicitly specified using the OUTPUT_FORMAT=DATA Query Variable or implied by the Input of a CSV format message, the OASIS Nodes shall respond with the following standard response header records for all OASIS Templates:

REQUEST_STATUS=nnn↵
ERROR_MESSAGE=aaa↵
TIME_STAMP=yyyymmddhhmmsstz↵
VERSION=nn.n~~1.4~~↵
TEMPLATE=aaaaaaaaaa↵
OUTPUT_FORMAT=DATA↵
PRIMARY_PROVIDER_CODE=aaaa↵
PRIMARY_PROVIDER_DUNS=nnnnnnnnn↵
RETURN_TZ=tz↵
DATA_ROWS=nnn↵
COLUMN_HEADERS=[Template Data Element names separated by commas] ↵

The format of the value associated with each of the Response header record Data Elements are dictated by the Data Dictionary. The value associated with the DATA_ROWS Data Element shall define the total number of Data Records returned in the message following the COLUMN_HEADERS header record. The COLUMN_HEADERS record defines, by Data Element name, the data associated with each comma-separated column contained in each subsequent Data Record (row). In all OASIS Node responses, the Data Element's full name shall be listed in the COLUMN_HEADERS record. The order of the column headings shall be the same as shown in the Templates for URL uploads and downloads. For graphical displays, the Provider may define the order that the Data Element names are shown.

Correction to 002-4.2.10:

002-4.2.10 Transaction Process

OASIS shall implement Templates that allow Customers and Sellers to enter, modify and consummate arrangements for transmission and ancillary services. In addition to the Template interface defined by these Standards, OASIS shall also provide a browser-based User Interface that implements the same basic functionality provided by the template interface through one or more displays or forms.

The OASIS transaction process is controlled through the transaction REQUEST_TYPE, identifying the type of transaction being conducted, and STATUS, indicating the request's current state in the transaction process. The WEQ 013-2 OASIS Implementation Guide Standard describes in detail the transaction process that must be implemented on OASIS. The Implementation Guide also provides specific requirements and recommendations related to the handling of particular requests ~~form~~ from both a technical and business process perspective.

Correction to 002-4.2.10.3.1 – line break after TIME_STAMP and before VERSION:

002-4.2.10.3.1 HTTP Notification

OASIS Nodes shall deliver dynamic notification to a client system based on HTTP URL information supplied in part by the STATUS_NOTIFICATION Data Element and by information supplied as part of the Customer's Company registration information. HTTP URL's are formed by the concatenation of a protocol field (i.e., http:), a domain name (e.g., //www.tsin.com), a port designation (e.g., :80), and resource location information.

The STATUS_NOTIFICATION Data Element shall contain the protocol field "http:", which designates the notification method/protocol to be used, followed by all resource location information required; the target domain name and port designations shall be inserted into the notification URL based on the Customer's Company registration information. The resource location

information may include directory information, cgi script identifiers and URL encoded query string name/value pairs as required by the Customer's application. An OASIS Node performs no processing on the resource location information other than to include it verbatim along with the protocol, domain name and port information when forming the URL that will be used to deliver the HTTP protocol notification message. For example,

> Company XYZ has established the domain name and port designations of "//oasistc.xyz.com:80" as part of their registration information. When a transmission reservation is submitted by one of Company XYZ's users (the Customer), and includes a STATUS_NOTIFICATION Data Element with the value of:
>
> http:/cgi-bin/status?DEAL_REF=8&REQUEST_REF=173
>
> An OASIS Node shall deliver an HTTP notification message using the URL:
>
> http://oasistc.xyz.com:80/cgi-bin/status?DEAL_REF=8&REQUEST_REF=173
>
> If the STATUS_NOTIFICATION field contained only the "http:" protocol designation, the notification message would be delivered using the URL:
>
> http://oasistc.xyz.com:80

The contents of the HTTP protocol notification message delivered by an OASIS Node shall consist of the complete URL created by combining fields from the STATUS_NOTIFICATION Data Element and Company registration information as part of an HTTP POST method request. In addition to the POST method HTTP header record, OASIS Nodes shall also append the CSV formatted output of the ***transstatus*** Template information for that particular reservation using the standard Content-type: text/x-oasis-csv and appropriate Content-length: HTTP header records. OASIS Nodes shall use a Primary Provider specific default value for RETURN_TZ in formulating the ***transstatus*** response information. Continuing with the previous example, the important records in the HTTP notification message that would be delivered to Company XYZ for the transmission reservation request submitted to Primary Provider ABC and given an ASSIGNMENT_REF of 245 would be:

> POST http://oasistc.xyz.com:80/cgi-bin/transtatus?DEAL_REF=8&REQUEST_REF=173 HTTP/1.0
> .
> .
> Content-type: text/x-oasis-csv
> Content-length: <byte count of remainder of message>↵
> REQUEST_STATUS=200↵
> ERROR_MESSAGE=aaa↵
> TIME_STAMP=20070910123010ES↵
> VERSION=nn.n↵
> TEMPLATE=transstatus↵

OUTPUT_FORMAT=DATA↵
PRIMARY_PROVIDER_CODE=ABC↵
PRIMARY_PROVIDER_DUNS=123456789↵
RETURN_TZ= ES↵
DATA_ROWS=1↵
COLUMN_HEADERS=CONTINUATION_FLAG, ASSIGNMENT_REF, . . . ↵
N, 245, . . . ↵

In the event an error is encountered delivering the HTTP notification message to the target URL as indicated by a failure of the target system to respond, or return of HTTP response status of 408, 500, 503, or 504, OASIS Nodes shall retry up to two more times, once every 5 minutes.

Correction to 002-4.3.4.1 *scheduledetail* template response – remove extra line break before ANNOTATION:

2. Response

CONTINUATION_FLAG
TIME_OF_LAST_UPDATE
SCHEDULE_REF
TRANSACTION_ID
    PATH_NAME
    POINT_OF_RECEIPT
    POINT_OF_DELIVERY
    GCA_CODE
    LCA_CODE
    SOURCE
    SINK
    SCHEDULE_PRIORITY
START_TIME
STOP_TIME
SCHEDULE_REQUESTED
SCHEDULE_GRANTED
ASSIGNMENT_REF
    SELLER_CODE
    SELLER_DUNS
    CUSTOMER_CODE
    CUSTOMER_DUNS
    AFFILIATE_FLAG
    SERVICE_INCREMENT
    TS_CLASS
    TS_TYPE
    TS_PERIOD
    TS_WINDOW
    TS_SUBCLASS
    NERC_CURTAILMENT_PRIORITY
    OTHER_CURTAILMENT_PRIORITY
    CAPACITY_USED
(if the transaction is subject to curtailment:)
PROVIDER_ACTION

SCHEDULE_LIMIT
CURTAILMENT_OPTIONS
SECURITY_REF
EVENT_ID
SECURITY_TYPE
INITIATING_PARTY (e.g., CA/TP code)
RESPONSIBLE_PARTY (e.g., SC code)
PROCEDURE_NAME (e.g., "NERC TLR", or registered)
PROCEDURE_LEVEL (e.g., "2a", "3")
FACILITY_CLASS (e.g., transformer, etc.)
FACILITY_LIMIT_TYPE (e.g., thermal, stability, etc.)
FACILITY_LOCATION (e.g., "INTERNAL" or "EXTERNAL")
FACILITY_NAME

ANNOTATION

Correction to 002-4.3.4.2 *security* template response – addition of line break at end of section:

2. Response

TIME_OF_LAST_UPDATE
SECURITY_REF
EVENT_ID
SECURITY_TYPE
INITIATING_PARTY (e.g., CA/TP code)
RESPONSIBLE_PARTY (e.g., SC code)
PROCEDURE_NAME (e.g., "NERC TLR", or registered)
PROCEDURE_LEVEL (dependent on PROCEDURE_NAME)
FACILITY_CLASS (e.g., "FLOWGATE", "LINE", etc.)
FACILITY_LIMIT_TYPE (e.g., "THERMAL", "STABILITY", etc.)
FACILITY_LOCATION (e.g., "INTERNAL" or "EXTERNAL", etc.)
FACILITY_NAME (e.g., path or flowgate name)
START_TIME
STOP_TIME
ANNOTATION

Correction to 002-4.3.4.3 *reduction* template response – addition of line break at end of section:

2. Response

CONTINUATION_FLAG
ASSIGNMENT_REF
CAPACITY_GRANTED
CAPACITY_AVAILABLE
START_TIME
STOP_TIME
REDUCTION_TYPE

REDUCTION_REASON
IMPACTING_REF (if applicable)
CAPACITY_REDUCED
NERC_CURTAILMENT_PRIORITY
OTHER_CURTAILMENT_PRIORITY

Correction to 002-4.3.4.4 *systemdata* template query and response:

Template**: systemdata**

1. **Query**

SYSTEM_ELEMENT_TYPE*
SYSTEM_ELEMENT*
SYSTEM_ATTRIBUTE*
START_TIME
STOP_TIME
TIME_OF_LAST_UPDATE

2. **Response (acknowledgment)**

POSTING_REF
SYSTEM_ELEMENT_TYPE
SYSTEM_ELEMENT
SYSTEM_ATTRIBUTE
START_TIME
STOP_TIME
ATTRIBUTE_VALUE
ATTRIBUTE_UNITS
ANNOTATION
TIME_OF_LAST_UPDATE

~~**002-4.3.5 Query/Response of Lists of Information**~~

~~**002-4.3.5.1 List (list)**~~

~~List (***list***) is used to provide lists of valid names. The minimum set of lists is LIST, SELLER_CODE, PATH_NAME, POINT_OF_RECEIPT, POINT_OF_DELIVERY, SERVICE_INCREMENT, TS_CLASS, TS_TYPE, TS_PERIOD, TS_SUBCLASS, TS_WINDOW, NERC_CURTAILMENT_PRIORITY, REQUEST_TYPE, ANC_SERVICE_POINT, FACILITY_CLASS, FACILITY_LIMIT_TYPE, PROCEDURE_NAME, SYSTEM_ATTRIBUTE, SECURITY_TYPE, FACILITY_LOCATION, OTHER_CURTAILMENT_PRIORITY, AS_TYPE, CATEGORY, and TEMPLATE. The information returned by the ***list*** Template may be used as values for the associated OASIS Data Elements to query information, post or request services.~~

~~Template: **list**~~

~~1.**Query**~~

~~LIST_NAME~~
~~TIME_OF_LAST_UPDATE~~

~~2.~~**~~Response~~**

~~TIME_OF_LAST_UPDATE~~
~~LIST_NAME~~
~~LIST_ITEM~~
~~LIST_ITEM_DESCRIPTION~~

~~002-4.3.6~~ ~~Purchase Transmission Services~~

~~The following Templates shall be used by Customers and Sellers to transact purchases of services.~~

Correction to 002-4.3.6.1 remove parentheses in third paragraph:

002-4.3.6.1 Customer Capacity Purchase Request (transrequest)

The **Customer Capacity Purchase Request** (Input) (***transrequest***) is used by the Customer to request the purchase of transmission services or request changes to previously submitted reservations for transmission services. The response simply acknowledges that the Customer's request was received by the OASIS Node. It does not imply that the Seller has received the request. Inputting values into the reference Data Elements is optional.

CUSTOMER_CODE and CUSTOMER_DUNS shall be determined from the registered connection used to input the request.

Supporting "profiles" of service, which request different capacities ~~(~~and/or price ~~)~~ for different time periods within a single request, is at the discretion of the Primary Provider. Continuation records may be used to indicate requests for these service profiles; use of continuation records is only supported when using the CSV Format upload of Template data. Each segment of a profile is represented by the set of Data Elements START_TIME, STOP_TIME, CAPACITY_REQUESTED, and BID_PRICE which define the intervals in time over which the specified capacity and price values apply. The initial segment of a profile is defined by the START_TIME STOP_TIME, CAPACITY_REQUESTED, and BID_PRICE Data Elements specified in the first or only record submitted; subsequent segments are specified in continuation records each containing the appropriate START_TIME, STOP_TIME, CAPACITY_REQUESTED, and BID_PRICE values defining the segment.

Correction to 002-4.3.6.2 add omitted period (.) in second paragraph:

002-4.3.6.2 Status of Customer Purchase Request (transstatus)

The **Status of Customer Purchase Request** (***transstatus***) is provided upon the request of any Customer or Provider to indicate the current status of one or more reservation records. Users may also view any transaction's status. However, the SOURCE and SINK may be masked for User requests until Transmission Providers must make source and sink information available at the time the request status posting is updated to show that a transmission request is confirmed.

Continuation records may be returned in association with a transmission reservation to convey information regarding: 1) sale or assignment of transmission rights on the secondary market (reassignments), 2) profiled requests, or 3) service over multiple paths. Each continuation record associated with a transmission reservation shall be identified by the CONTINUATION_FLAG Data Element set to 'Y' and include the ASSIGNMENT_REF Data Element.

Correction to 002-4.3.6.3:

002-4.3.6.3 Seller Approval of Purchase (transsell)

Seller Approval of Purchase (Input) (***transsell***) is input by a Seller to modify the status and queue of a request by a Customer.

The following fields may be submitted in continuation records for the ***transsell*** Template to convey transmission rights from multiple original transmission reservations to this new reservation: REASSIGNED_REF, REASSIGNED_CAPACITY, REASSIGNED_START_TIME, and REASSIGNED_STOP_TIME. Use of continuation records is only supported when using the CSV format upload of Template data.

If the Provider/Seller cannot accommodate the Customer's CAPACITY_REQUESTED and is obligated or elects to offer the Customer partial service that varies over the total period of the reservation or the Provider/Seller supports the negotiation of price on individual segments of a profiled reservation request (support for reservation profiles is at the discretion of the Provider), the set of data elements START_TIME, STOP_TIME, CAPACITY_GRANTED, and OFFER_PRICE must be specified ~~on the first record and START_TIME and STOP_TIME must be repeated in continuation records as necessary for varying CAPACITY_GRANTED and OFFER_PRICE. In all cases the full profile should be represented.~~ and may be repeated in continuation records.

SELLER_CODE and SELLER_DUNS shall be determined from the registered connection used to input the request. The SELLER_REF Data Element may be set by the SELLER to a seller specific internal tracking number.

If the reservation is subject to the right of first refusal pending a status change to Displaced, the COMPETING_REQUEST_FLAG shall be set to Y, and SELLER_COMMENTS shall be updated with a reference to the competing request's ASSIGNMENT_REF. If the reservation is subject to the right of first refusal pending a status change to Superseded, the

COMPETING_REQUEST_FLAG shall be set to Y, the OFFER_PRICE shall be updated, the SELLER_COMMENTS shall be updated with a reference to the competing requests ASSIGNMENT_REF, and the STATUS shall be set to COUNTEROFFER. Once the disposition of the request is finalized, the COMPETING_REQUEST_FLAG shall be reset to N and any appropriate status change shall be made.

OASIS shall allow the Seller to set the transmission service request's STATUS to ACCEPTED only when the CAPACITY_REQUESTED and BID_PRICE match the corresponding CAPACITY_GRANTED and OFFER_PRICE data elements over the START_TIME and STOP_TIME of the request.

With the exception for REQUEST_TYPEs of PART_TRANSFER or FULL_TRANSFER, OASIS shall set a pre-confirmed transmission service request to CONFIRMED when the Provider/Seller sets the request's STATUS to ACCEPTED. PART_TRANSFER and FULL_TRANSFER requests require that both STATUS be set to ACCEPTED and PRIMARY_PROVIDER_APPROVAL be set to the value of Y prior to OASIS moving the STATUS to CONFIRMED.

If the service requested is subject to specific non-conforming conditions for service, e.g., Conditional Curtailment Option for long-term Firm service, and those conditions are subject to review and renegotiation by the Primary Provider, the time when such a reassessment may be performed is identified in the REASSESSMENT_DUE_TIME.

The deadline for submitting a RENEWAL request to exercise rollover rights shall be captured in the RENEWAL_DUE_TIME data element. If applicable, any limitations to renewal/rollover rights associated with a confirmed reservation are documented in one or more sets of ROLLOVER_START_TIME, ROLLOVER_STOP_TIME, and ROLLOVER_CAPACITY data elements.

If this template is submitted by the Provider, and the Provider is not listed as the SELLER in the request, the Provider may only submit non-null values for the CONTINUATION_RECORD, ASSIGNMENT_REF, PRIMARY_PROVIDER_–APPROVAL, PRIMARY_PROVIDER_COMMENTS, RENEWAL_DUE_TIME, ROLLOVER_START_TIME, ROLLOVER_STOP_TIME, and ROLLOVER_CAPACITY data elements; all other template data elements must be null.

If this template is submitted by the Seller that is not the Primary Provider, the PRIMARY_PROVIDER_APPROVAL, PRIMARY_PROVIDER_COMMENTS, ~~PRIMARY_PROVIDER_CONDITIONS,~~ REASSESSMENT_DUE_TIME, RENEWAL_DUE_TIME, ROLLOVER_START_TIME, ROLLOVER_STOP_TIME, and ROLLOVER_CAPACITY data elements must be null.

Correction to 002-4.3.6.4 *trancust* template response:

2. Response

RECORD_STATUS
CONTINUATION_FLAG
ASSIGNMENT_REF
START_TIME
STOP_TIME
REQUEST_REF
DEAL_REF
BID_PRICE
STATUS
STATUS_COMMENTS
ANC_SVC_LINK
STATUS_NOTIFICATION
CUSTOMER_COMMENTS
CAPACITY_REQUESTED
ERROR_MESSAGE
~~CAPACITY_REQUESTED~~

Correction to 002-4.3.7.2 addition of line break after template Input and before Response:

1. **Input**

POSTING_REF (Must be provided)
CAPACITY (only if modified)
START_TIME (only if modified)
STOP_TIME (only if modified)
OFFER_START_TIME (only if modified)
OFFER_STOP_TIME (only if modified)
ANC_SVC_REQ (only if modified)
SALE_REF (only if modified)
OFFER_PRICE (only if modified)
SERVICE_DESCRIPTION (only if modified)
SELLER_COMMENTS (only if modified)

Corrections to 002-5.10.1 removal of deleted data element PRIMARY_PROVIDER_CONDITIONS from *transstatus* and *transsell* and SERVICE_INCREMENT from *transupdate*:

002-5.10.1 OASIS DATA ELEMENT CROSS REFERENCE

The following table documents the mapping of Data Element changes from S&CP VERSION 1.4 to VERSION 1.5.

Template	Deleted Data Element	New Data Element	Conversion Requirements
transoffering (response)		OFFER_INCREMENT	If there are transmission offerings that need to be converted OFFER_INCREMENT shall take on the value of SERVICE_INCREMENT.
scheduledetail (response)		ANNOTATION	No data to convert.
security (response)		ANNOTATION	No data to convert.
reduction (query)		CUSTOMER_CODE	
reduction (query)		CUSTOMER_DUNS	
reduction (query)		PATH_NAME	
reduction (query)		POINT_OF_RECIEPT	
reduction (query)		POINT_OF_DELIVERY	
reduction (query)		REDUCTION_TYPE	Prior use of free form text for REDUCTION_TYPE will not be able to be queried directly unless they are registered by the primary provider or otherwise enumerated in the Data Dictionary. Or the primary provider may convert free form text to use registered values.
reduction (response)		NERC_CURTAILMENT_PRIORITY	No data to convert.
reduction (response)		OTHER_CURTAILMENT_PRIORITY	No data to convert.
systemdata (query/response)		SYSTEM_ELEMENT	Existing postings for ATC system attributes shall populate this Data Element from the value of PATH_NAME.
systemdata (query/response)		SYSTEM_ELEMENT_TYPE	Existing postings for ATC system attributes shall populate this Data Element with the literal text PATH.
systemdata (query/response)	PATH_NAME		Converted to SYSTEM_ELEMENT.
systemdata (query/response)	POINT_OF_RECEIPT*		Deleted no longer used.
systemdata (query/response)	POINT_OF_DELIVERY*		Deleted no longer used.

Template	Deleted Data Element	New Data Element	Conversion Requirements
systemdata (response)		ANNOTATION	No data to convert.
transstatus (response)		PRIMARY_PROVIDER_APPROVAL	No data to convert.
~~transstatus (response)~~		~~PRIMARY_PROVIDER_CONDITIONS~~	~~No data to convert.~~
transstatus (response)		REASSESSMENT_DUE_TIME	No data to convert.
transstatus (response)		RENEWAL_DUE_TIME	No data to convert.
transstatus (response)		ROLLOVER_START_TIME	No data to convert.
transstatus (response)		ROLLOVER_STOP_TIME	No data to convert.
transstatus (response)		ROLLOVER_CAPACITY	No data to convert.
transsell (input/response)		PRIMARY_PROVIDER_APPROVAL	No data to convert
~~transsell (input/response)~~		~~PRIMARY_PROVIDER_CONDITIONS~~	~~No data to convert~~
transsell (input/response)		PRIMARY_PROVIDER_COMMENTS	No data to convert
transsell (input/response)		REASSESSMENT_DUE_TIME	No data to convert
transsell (input/response)		RENEWAL_DUE_TIME	No data to convert
transsell (input/response)		ROLLOVER_START_TIME	No data to convert
transsell (input/response)		ROLLOVER_STOP_TIME	No data to convert
transsell (input/response)		ROLLOVER_CAPACITY	No data to convert
transcust (input/response)	PRECONFIRMED		With priority given to pre-confirmed requests, this attribute may only be set at original time of submission.
Transassign (input/response)		REQUEST_TYPE	No conversion required its default value is already defined.
Transassign (input/response)		BID_PRICE	Set to the same value as OFFER_PRICE.
Transassign (input/response)		RELATED_REF	No data to convert
Transpost (input/response)		OFFER_INCREMENT	Must be set to SERVICE_INCREMENT when Seller is the primary provider. Otherwise supplied on input by the Reseller.
~~transupdate (input/response)~~		~~OFFER_INCREMENT~~	~~Must be set to SERVICE_INCREMENT when Seller is the primary provider. Otherwise supplied on input by the Reseller.~~

Template	Deleted Data Element	New Data Element	Conversion Requirements
Anccust (input/response)	PRECONFIRMED		This attribute may now only be set at original time of submission. .

Correction to WEQ-003 to expand SYSTEM_ATTRIBUTE field length to accommodate several of the enumerated values which were beyond stated 15 character limit:

003-0 OASIS DATA DICTIONARY Version 1.5				
Data Dictionary Element Name	**Alias**	**Field Format : minimum characters {type of ASCII} maximum characters**	**Restricted Values**	**Definition of Data Element**
SYSTEM_ATTRIBUTE	SYSATTR	0{ALPHANUMERIC}25~~15~~	Valid Values: CBM FTRM NFTRM TTC FATC NFATC ATC_ANNOTATION ZONE_LOAD_FORECAST SYSTEM_LOAD_FORECAST NATIVE_LOAD_FORECAST ACTUAL_LOAD {Registered}	Type of system data viewed by systemdata template: CBM – Capacity Benefit Margin FTRM – Transmission Reliability Margin for use in FATC NFTRM – Transmission Reliability Margin for use in NFATC TTC – Total Transmission Capability FATC –Firm Available Transmission Capability NFATC – Non-firm Available Transmission Capability ATC_ANNOTATION – Annotation for a change in monthly or yearly posted ATC. ZONE_LOAD_FORECAST – Forecast of anticipated Load in a metered zone SYSTEM_LOAD_FORECAST – Forecast of total system wide load within a Balancing Area NATIVE_LOAD_FORECAST – Forecast of portion of total system load forecast for native load portion of total system load within a Balancing Area ACTUAL_LOAD – Actual daily peak load values for the metered Balancing Area or metered Zone within the BA posted after the fact {registered} – Provider specific registered name for the data posted

Business Practices for Open Access Same-Time Information Systems (OASIS) Implementation Guide
Version 1.5

Correction to 013-2.2 definition of CONFIRMED:

013-2.2 Transaction Status

The following are the defined values that may appear in the STATUS data element associated with a given OASIS transaction:

QUEUED = initial status assigned by TSIP on receipt of "customer services purchase request."

INVALID = assigned by TSIP, or Primary Provider indicating an invalid field in the request, such as improper POR, POD, source, sink, etc. (Final state)

RECEIVED = assigned by Primary Provider or Seller to acknowledge QUEUED requests and indicate the service request is being evaluated, including for completing the required ancillary services.

STUDY= assigned by Primary Provider or Seller to indicate some level of study is required or being performed to evaluate service request.

REFUSED = assigned by Primary Provider or Seller to indicate service request has been denied due to lack of available transfer capability. (Final state)

COUNTEROFFER = assigned by Primary Provider or Seller to indicate that a new value for OFFER_PRICE and/or CAPACITY_GRANTED over time is being proposed in the negotiation of requested service, i.e., offering of partial service or negotiation of price..

REBID = assigned by Transmission Customer to indicate that a new value for BID_PRICE and/or CAPACITY_REQUESTED over time is being proposed.

SUPERSEDED = assigned by Primary Provider or Seller when a request which has not yet been confirmed is preempted by another reservation request. (Final state)

ACCEPTED = assigned by Primary Provider or Seller to indicate the service request at the designated BID_PRICE and CAPACITY_REQUESTED has been approved/accepted. Depending upon the type of ancillary services required, the Seller may or may not require all ancillary service reservations to be completed before accepting a request.

DECLINED = assigned by Primary Provider or Seller to indicate that the terms and conditions of the request, such as the BID_PRICE, are unacceptable and that negotiations are terminated or that contractual terms and conditions have not been met. (Final state)

CONFIRMED = assigned by Transmission Customer in response to Primary Provider or Seller posting "ACCEPTED" or "COUNTEROFFER" status, to confirm service. Once a request has been "CONFIRMED," a transmission service reservation exists. (Final state, unless overridden by DISPLACED or ANNULLED state)

WITHDRAWN = assigned by Transmission Customer during in request evaluation to withdraw the request from any further action. (Final state)

DISPLACED = assigned by Primary Provider or Seller when a "CONFIRMED" reservation from a Transmission Customer is displaced by a higher priority reservation and the Transmission Customer is not offered or has not exercised right of first refusal (i.e. refused to match terms of new request). (Final state)

ANNULLED = assigned by the Seller when, by mutual agreement with the Transmission Customer, a confirmed reservation is to be voided, or assigned unilaterally by the Primary Provider when a confirmed reservation is to be voided. (Final state)

RETRACTED = assigned by Primary Provider or Seller when the Transmission Customer fails to confirm or withdraw the request within the required time period. (Final state)

Standards Review Subcommittee Update May – August 2008

August 19, 2008

Status

- Met twice
  - June 5
  - July 25
- Followed 2008 SRS meeting schedule
- Utilized SRS Exploder List

Accomplishments

- NERC Standards Development Plan 2008 - 2010
  - Reviewed the plan and provided comments to NERC - July 31, 2008.
- 2008 WEQ Annual Plan – 6.f
  - Review and evaluate whether to cut off or put a size limit on the entities for which the standard apply.
    - Recommended that cut off limit should not be addressed by NAESB.
    - Entities should use the existing request for waiver or exemption established by FERC.

Accomplishments

- 2008 WEQ Annual Plan – Provisional Item 5
  - Review Market System Back-Up existing language and review of existing back-up language
    - Developed White Paper for EC Review
    - Request for Executive Committee Guidance - No Action is needed and SRS can close books on this item.
- Requests from other Subcommittees
  - BPS/ESS/ITS – Review FAC Standards
    - No new standards need to be developed
  - BPS – Review EOP-002 R4 and R6
    - Recommended adding an item to the Annual Plan

Accomplishments

- Formal Comments on Draft Standards to EC
  - 2008 AP Item 6.d – Ancillary Services Definitions
  - 2008 AP Items 2.a.i.2, 2a.vii.1 – Conditional Firm
  - 2008 AP Items 2a.iv.4, 2.a.vi.4, 2.b.ii.1 – Existing Transmission Commitments
  - 2008 AP Items 2.b.ii.2 – Postbacks and Counterflows

Ongoing

- Continue to track NERC Activity through the SRS Review of NERC Activity Report
- Reviewing NERC/NAESB definitions for consistency where applicable
- For the subcommittee to accomplish its work, it is going to need continuous industry support.

Questions/Feedback

- Are there other activities the subcommittee should be performing?

Request for Executive Committee Guidance

Quadrant:	Wholesale Electric Quadrant
Annual Plan Item:	2008 Provisional Item 5 Review Market System Back-Up existing language and review of existing back-up language
Submitted By:	Standards Review Subcommittee
Date:	July 25, 2008

OVERVIEW

The WEQ Standards Review Subcommittee (SRS) is requesting guidance from the Executive Committee on how to proceed with 2008 WEQ Annual Plan Provisional Item 5 "Review Market System Back-Up existing language and review of existing back-up language." Based on the analysis performed by the SRS, which was reviewed at the June 5, 2008, SRS meeting they would like clarification from the WEQ Executive Committee (EC) as to whether the analysis perform satisfies this annual plan item or whether additional work is required.

If the WEQ EC believes that the analysis provided below meets the objective of Provisional Item 5, the SRS would recommend that the Provisional Item be moved off the Provisional List to an active 2008 Annual Plan item. The SRS would submit a Recommendation that no further action is required beyond the analysis performed to date. If the WEQ EC believes that additional work is required, the SRS is requesting that the EC provide additional detail as to the objective of the Provisional Item so that the SRC could continue to develop work products to meet the objective.

BACKGROUND

Research into scope of the annual plan item did not provide much assistance as to the overall objective of this initiative. Additionally it seems somewhat awkward that the SRS is asking for guidance on a Provisional Item that they asked to be included in the Annual plan. During the September 19, 2007, meeting, the SRS reviewed the NAESB Standards Authorization Request (SAR) for Back-up Facilities Project 2006-04. During the course of discussion it was determined that NAESB did not need to develop complementary standards to the proposed SAR, but it was suggested that NAESB may want to add some verbiage for Market System Backup to the Annual Plan.

> *9. Backup Facilities*
>
> *Mr. Saini suggested waiting until more information on this issue could be ascertained. Ms. Rehman questioned whether this issue had a commercial application because it was addressed to ensuring reliability. She went on to say that OASIS does have a backup requirement that is stringent but other than that there is no other existing business practices regarding backup requirements. Ms. Kennedy stated that if there is a need for a backup requirement for e-tag it would not be a NAESB standard, because e-tag is not currently a NAESB standard. Ms. Kennedy also recommended adding this to the list as an annual plan item for 2008 as Market System Backup. Mr. Saini was in favor of this. Ms. Rehman was also in favor of adding this item to the annual plan for 2008 and*

suggested removing this item from the agenda. All participants agreed to remove this item without formal vote.

As a result of this discussion a Provisional Line item was added to the annual plan that has no set scope.

ANALYSIS SUMMARY

After completing the 2008 WEQ Annual Plan Items specifically assigned to the SRS, the subcommittee agreed to look at those Provisional Items, which could be worked by the SRS. From this review the SRS agreed to conduct the initial analysis on two provisional items:

- Review and evaluate whether to cutoff or put a size limit on the entities for which the standards apply, and
- Review Market System Back-Up existing language and review of existing back-up language.

Dean Ulch, Roman Carter, and JT Wood conducted the initial analysis of the request to add the Annual Plan to Review Market System Back-Up existing language and review of existing back-up language. They reviewed the meeting minutes and identified several items that are discussed below along with the subcommittee's determination.

1. It was proposed that the subcommittee should not take action on this item until information could be developed.

   Response: The subcommittee believes that the analysis in this document provides sufficient information for the WEQ EC to determine if the Provisional Item should be pursued further.

2. A question was raised regarding whether the issue of Back-up Facilities had a commercial application because it was addressed to ensure reliability.

   Response: The subcommittee does agree that back-up facilities such as OASIS backup procedures/processes, and applications do have commercial applications.

3. It was mentioned that OASIS has a backup requirement that is stringent but other than that there are no other existing Business Practices regarding backup requirements.

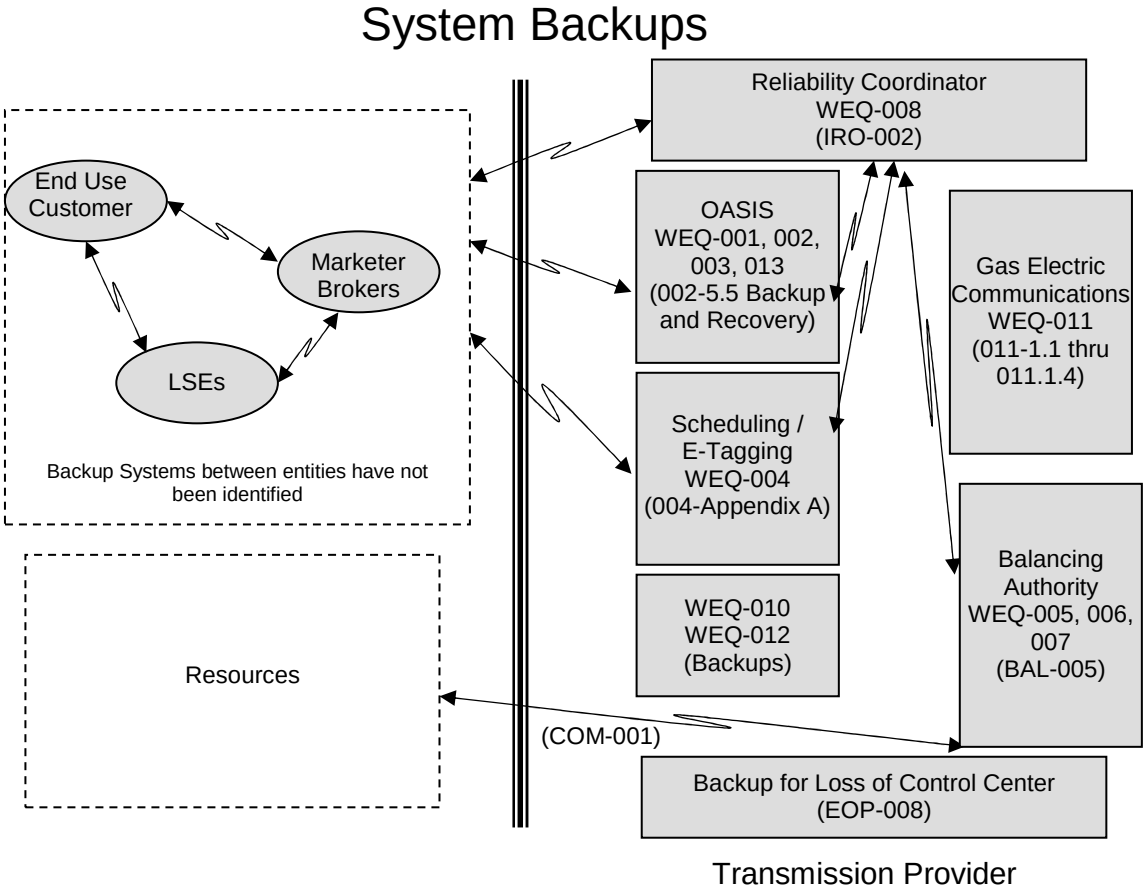
   Response: The analysis looked at those applications which are under the NAESB and Joint NERC/NAESB purview to determine if those systems had sufficient back-up standards.

4. It was stated that if there is a need for a backup requirement for e-tag it would not be a NAESB standard, because e-tag is not currently a NAESB standard.

   Response: The analysis conducted does show the NAESB through the Coordinate Interchange Business Practice (Recommendation R05001) does in fact have input on the back-up requirements for the e-tagging system.

ANALYSIS BY NAESB BUSINESS PRACTICES

The subcommittee reviewed each of the NAESB business practices to determine if addition backup standards should be created as documented in the graphic below. The analysis of each business practice is also provided.



WEQ 001 – OASIS BUSINESS PRACTICES, WEQ 002 – OASIS STANDARDS AND COMMUNICATION PROTOCOLS, WEQ 003 – OASIS DATA DICTIONARY, AND WEQ 013 – OASIS IMPLEMENTATION GUIDE

The OASIS Business Practices have already addressed backup requirements under WEQ 002-5.5 Backup and recovery. This business practice includes requirements for "Spurious Failure Recovery Time", "Long-Term Backup", and "Catastrophic Failure Recovery." Based on what is included in the existing business practices the subcommittee determined backup requirements for OASIS have already been addressed.

WEQ 004 – COORDINATE INTERCHANGE

For Coordinate Interchange the subcommittee reviewed the requirements specified in R05001 (ratified in June 2006) which provide backup requirement for the e-tagging system. Based on the table listed below the subcommittee

determined that adequate back-up procedures are available for the e-tagging system.

The table below lists typical tagging failures that might occur and the emergency actions that the entity will take to compensate for that failure:

Entity	***Connectivity Problem***	***Backup actions***
Requesting PSE	Unable to submit tag to Interchange Authority Service.	Ask another entity in the transaction chain to submit the schedule for you. He then becomes the author. Create a backup paper copy of the schedule and fax to authority service entity and all approval entities in the transaction.
Path Participant	Not receiving update messages.	Use Recovery Process to resynchronize from authority service. Use telephone with Authority Service Entity to update status.
Interchange Authority Service Entity	Unable to send messages to generation or load Balancing Authorities.	Telephone schedule author to notify of the message failure. The author will fax the schedule to the Approval Entity for these control areas. Telephone Approval Entity to notify of the message failure. Approve or deny the schedule at the request of the Approval Entity (override).
Interchange Authority Service Entity	Unable to send messages to an Approval Entity for an intermediate Transmission Provider or Balancing Area.	Telephone schedule author to notify of the message failure. The author will fax the schedule to the Approval Entity. Telephone Approval Entity to notify of the message failure. Approve the schedule automatically. Deny the schedule at the request of the Approval Entity (override).
Interchange Authority Service Entity	Unable to send messages to an information only entity.	No Action required.
Interchange Authority Service Entity	Unable to receive messages.	Broadcast a message by email or fax to all entities that use your authority service. The message should forecast a recovery time for your service. In the meantime, your Interchange Authority Service is down.

Entity	*Connectivity Problem*	*Backup actions*
Approval Entity	Unable to receive messages from an authority service. (The Authority has an obligation to notify you and the authoring PSE. The Authoring PSE has an obligation to fax the tag to the approver.)	Use the Recovery Process to resynchronize from Authority Services or Central Repository. Telephone the Authority Service entity with the approval or denial of the schedule.
Approval Entity	Unable to send messages to an authority service.	Telephone the Interchange Authority Service Entity with approval or denial of the schedule.
Checkout Partner	Unable to exchange messages.	Telephone net exchange to the checkout partner. Create a backup paper copy of the checkout data and fax to the checkout partner.

Notes:

1. The first action in every case is to attempt to establish connection by using an alternate communication method, a second Internet service provider, dial up connection, or a private network if one is available.
2. Next, the backup actions are attempted in the order specified.
3. The backup actions include printing paper reports from the internal energy management system. The reports include a schedule detail report for a short time period, net exchange between two operational entities, and transmission reservation usage between a transmission provider and a customer.
4. Every backup action list ends with a fax or telephone call that is completely independent of the public Internet.

WEQ 005 – ACE EQUATION SPECIAL CASES; WEQ 006 – MANUAL TIME ERROR CORRECTIONS; AND WEQ 007 INADVERTENT PAYBACK

These NAESB Business Practices are closely aligned with the NERC Balancing Authority Control Standards. The subcommittee reviewed the NERC controls for the complementary standards and determined that adequate back-up requirements are documented on the NERC side and no additional requirements need to be developed by NAESB. In reaching this decision the subcommittee reviewed:

Balancing Authority Back-Up Systems and Procedures:

The following sections of BAL standards address the requirements for back-up systems for Balancing Authority activities:

BAL-005-R7 AGC Inoperative

The Balancing Authority shall operate AGC continuously unless such operation adversely impacts the reliability of the Interconnection. If AGC has become inoperative, the Balancing Authority shall use manual control to adjust generation to maintain the Net Scheduled Interchange.

BAL-005-R8.1 Redundant Frequency Metering
Each Balancing Authority shall provide redundant and independent frequency metering equipment that shall automatically activate upon detection of failure of the primary metering.
This overall installation shall provide a minimum availability of 99.95%.

BAL-005-R15 Control Center Back-Up Power
The Balancing Authority shall provide adequate and reliable backup power supplies and shall periodically test these supplies at the Balancing Authority's control center and other critical locations to ensure continuous operation of AGC and vital data recording equipment during loss of the normal power supply.

Communication Equipment Procedures during Facility Failure:

COM-001-R1.4 Redundant Telecommunications Facilities
Each RC, TO, and BA shall provide adequate and reliable telecommunications facilities and redundancy of that equipment, where applicable.

COM-001-R5 Written Procedures for Actions during Equipment Failure
Each RC, TO, and BA shall have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications facilities.

Loss of Control Center Functionality

NERC Standard EOP-008 (Plans for Loss of Control Center Functionality) in its entirety addresses the requirements and standards for back-up control center operations.
ftp://www.nerc.com/pub/sys/all_updl/standards/rs/EOP-008-0.pdf

Reliability Coordination Facilities

IRO-002-R8. Back-Up Facilities (SOL and IROL Monitoring) Each Reliability Coordinator shall continuously monitor its Reliability Coordinator Area. Each Reliability Coordinator shall have provisions for backup facilities that shall be exercised if the main monitoring system is unavailable. Each Reliability Coordinator shall ensure SOL and IROL monitoring and derivations continue if the main monitoring system is unavailable.

IRO-002-R9. Procedures for Loss of Analysis Tools. Each Reliability Coordinator shall control its Reliability Coordinator analysis tools, including approvals for planned maintenance. Each Reliability

Coordinator shall have procedures in place to mitigate the effects of analysis tool outages.

WEQ 008 – TRANSMISSION LOADING RELIEF

These standards are related to the NERC Interchange Distribution Calculator (IDC) application which is outside of the control of NAESB. If NAESB was to develop back-up requirements for the IDC it should be addressed under the provisional item directly linked to the IDC 2008 WEQ AP Provision Item 7 "Determine any needed NAESB action in support of the Interchange Distribution Calculator (IDC) and develop any necessary standards."

WEQ 009 – STANDARDS OF CONDUCT

This Business Practice has been deleted from the NAESB Business Practices Version 1.

WEQ 010 – CONTRACTS RELATED STANDARDS

Considering the Funds Transfer Agent Agreements are included only by reference in the WEQ Business Practices the subcommittee did not consider the need for developing additional back-up standards for this Business Practice.

WEQ 011 – GAS/ELECTRIC COORDINATION

The Business Practices as they exist provide for alternate methods for the public utilities to receive notices from gas transportation service providers as well as allowing the parties to "mutually create alternative communication procedures." Based on the flexibility in the current Business Practices the Subcommittee has determined no additional backup requirements are needed.

WEQ 012 – PUBLIC KEY INFRASTRUCTURE

This Business Practice discusses in detail the PKI standards. The subcommittee has determined that no unique backup standards need to be developed under this Business Practice as it exists today. However, backup requirements may be required as PKI standards are developed for OASIS (2008 AP Item 3.b.ii) and for e-tagging (2008 AP Item 3.b.iii). If so, the back-up requirements should be developed under those AP Items part of a total package for rolling out the PKI standards for a specific application.

SUBCOMMITTEE RECOMMENDATIONS

1. Upon completing its review of backup requirements currently in place and the current Business Practices the Standards Review Subcommittee does not see a need at this time to develop additional backup requirements.
2. As new standards are developed back-up requirements should be considered as part of the Business Practice rather than as a separate initiative.

3. The provisional requirement “Review Market System Back-Up existing language and review of existing back-up language” should be moved to a 2008 annual plan item with fourth quarter completion date.
4. The SRS should create a “No Action” recommendation for this item to close the books on the Provisional Item.
5. The Annual Plan Committee should consider requiring a write-up for new items being added to future annual plans, in order to provide some level of scope to the annual plan item.

CONCLUSION

The subcommittee believes they have met the objective of the Provisional item and no further work, beyond creating a “No Action” recommendation is required by the subcommittee. In the event the WEQ EC does not agree with the subcommittee’s findings the subcommittee will need additional guidance from the WEQ EC on this provisional item before work can continue on this item.

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
ATC GROUP ASSIGNMENTS (ESS/ITS and BPS)				
243, 244, 246	Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitment (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard* Paragraphs 243, 244, and 246 will require coordination with the NERC Order 890 reliability standards development *Posting requirements for ETC assigned to ESS/ITS (see 2008 AP 2(a)(vi)(4) and Order 890 WP, Group 6) **Order 890-A:** 63. The Commission also found that inclusion of all requests for transmission service in ETC would likely overstate usage of the system and understate ATC. The Commission therefore found that reservations that have the same point of receipt (POR) (generator) but different point of delivery (POD) (load), for the same time frame, should not be modeled in the ETC calculation simultaneously if their combined reserved transmission capacity exceeds the generator's nameplate capacity at the POR. The Commission directed public utilities, working through NERC, to develop requirements in MOD-001 that lay out clear instructions on how these reservations should be modeled. The Commission also concluded that some elements of ETC are candidates for business practices instead of reliability standards and directed public utilities, working through NAESB, to develop business practices necessary for full implementation of the MOD-001 reliability standard. 151. We decline to impose additional posting requirements regarding ETC uses, as requested by EPSA and Powerex. In Order No. 890, the Commission required transmission providers to make available all data used to calculate ATC for constrained paths and any system planning studies or specific network impact studies performed for customers. This would include information regarding ETC uses, including grandfathered agreements, that affect ATC calculations or study results. EPSA and Powerex fail to demonstrate that it is necessary to require the posting of additional information regarding ETC uses to verify the accuracy of the transmission provider's ATC calculations. We note in response to Powerex that, if any new service taken upon expiration of a pre-Order No. 888 contract, the terms and conditions of the transmission provider's OATT would apply.	WEQ 2008 Annual Plan Item 2(b)(ii)(1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter , 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	The NAESB ESS/ITS and BPS are working to draft complementary business practices to the NERC MOD028, MOD029, and MOD030, which includes ETC. The NERC team has determined that there is not a need for explicit posting of ETC values; the ESS/ITS and BPS supports the decision. ESS/ITS/BPS will look at the NERC MODs to determine if additional business practices are needed for ETC components. Recommendation was voted out of subcommittee on June 17, 2008. Formal comment period closed on July 21, 2008.
293	• Business practice standards for accounting for **counterflows**. These standards will be included in the ATC business practice standards (Paragraph 293 will require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(ii)(2)	**These dates are dependent on NERC deliverables and may be changed if NERC**	The ESS/ITS and BPS have created a list of items that are considered post-backs to be used in the creation of

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
			timelines for Order 890 are changed: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter 2008	post back requirements. NERC has requested that NAESB practices address post-back requirements. (8/16/07) On March 11-12, 2008, the ESS/ITS and BPS passed motions to define high level concepts for counterflows and post backs. Draft standards are being developed by sub-teams. Subcommittee voted recommendation for counterflows and Postbacks out of subcommittee on May 15, 2008. Formal comment period closed on June 23, 2008.
257	**Capacity Benefit Margin (CBM) Business Practices** • Business practice standards to set forth "how the CBM value shall be determined, allocated across transmission paths, and used" and how transmission providers will "reflect the set-aside of transfer capability as CBM in the development of the rate for point-to-point transmission service." (Paragraph 257 will require coordination with the NERC Order 890 reliability standards development) **Order 890-A:** 68. The Commission directed public utilities, working through NERC and NAESB, to develop clear standards and business practices for how the CBM value is determined, allocated across transmission paths and flowgates, and used. To ensure that CBM is used for its intended purpose, the Commission provided that CBM shall only be used to allow an LSE to meet its generation reliability criteria. The Commission rejected requests to allow CBM to be used to meet reserve-sharing needs, explaining that TRM is the appropriate category for that purpose. Public utilities were directed to work with NAESB to develop an OASIS mechanism that will allow for auditing of CBM usage. 83. The Commission did not mandate a particular methodology for allocating CBM over transmission paths and flowgates in Order No. 890. We therefore reject Southern's argument	WEQ 2008 Annual Plan Item 2(b)(iii)(1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD004. The ESS/ITS and BPS have identified the NAESB business practice standards that may be needed to address CBM, including where the CBM value shall be posted; how to allocate priority use of CBM; how to allocate the amount of CBM; the ability to audit CBM usage; a new request type on OASIS to distinguish a CBM

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	that development of a consistent methodology for calculating CBM would be harmful to LSEs because reserve needs vary from area to area. While we expect the NERC and NAESB process to produce a consistent and transparent process for setting aside and allocating CBM based on LSE requests, we decline to prescribe a specific method for how CBM should be obtained or allocated or otherwise determine the amount of capacity that the transmission provider has to set aside in response to requests from multiple LSEs.			reservation; and for the posting of CBM on the OASIS systemdata template. The joint subcommittee has determined no additional standards need to be developed for this work plan item. Recommendation voted out of subcommittee on July 30th.
262	• Business practice standards that include an OASIS mechanism to "allow for auditing of CBM usage." (Paragraph 262 does not require coordination with the NERC Order 890 reliability standards development) **Order 890-A:** 68. The Commission directed public utilities, working through NERC and NAESB, to develop clear standards and business practices for how the CBM value is determined, allocated across transmission paths and flowgates, and used. To ensure that CBM is used for its intended purpose, the Commission provided that CBM shall only be used to allow an LSE to meet its generation reliability criteria. The Commission rejected requests to allow CBM to be used to meet reserve-sharing needs, explaining that TRM is the appropriate category for that purpose. Public utilities were directed to work with NAESB to develop an OASIS mechanism that will allow for auditing of CBM usage.	WEQ 2008 Annual Plan Item 2(b)(iii)(2)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for CBM, including auditing of CBM usage. 8/16/07 If we are using existing templates and the existing templates have corresponding "Audit Templates", additional work may not be needed**.** The joint subcommittee is working with JISWG on this annual plan item. Changes are expected to be required for WEQ 001, 002, 003, 004, and 013. Recommendation voted out of subcommittee on July 30th.
	• Any additional business practice standards needed to complement the NERC CBM reliability standards (MOD004) created as a result of this effort. (This item is a catchall section in case there are areas where business practices are needed as a result of the	WEQ 2008 Annual Plan Item 2(b)(iii)(3)	**These dates are dependent on NERC deliverables and may be**	The ESS/ITS and BPS have begun identifying complementary business

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	NERC CBM reliability standards. This item will require coordination with the NERC Order 890 reliability standards development).		**changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter,, 2008	practices to NERC MOD004. The joint subcommittee has determined no additional standards need to be developed for this work plan item. Recommendation voted out of subcommittee on July 30th.
272	• Transmission Reliability Margin (TRM): Business Practice Standards to complement the NERC reliability standards for TRM (Paragraph 272 will require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(iv) (1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD008. The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for TRM, 8/16/07 The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 3/31/08. Recommendation posted for 30-day formal comment period on April 8th. The recommendation was voted out of the EC on May 13.
273	• The TRM business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM (Paragraph 273 will	WEQ 2008 Annual Plan Item 2(b)(iv)(2)	**These dates are dependent on NERC deliverables and may be**	The ESS/ITS and BPS have begun identifying complementary business

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	require coordination with the NERC Order 890 reliability standards development) **Order 890-A:** 94. The Commission clarifies that NERC was not directed to identify an actual number or a particular methodology to include in the TRM standards, MOD-008-0 and MOD-009-0. The Commission's intent was to require NERC and NAESB to include consistent criteria and guidelines in the calculation and uses of TRM by transmission providers. Likewise, in response to Southern's concern regarding flexibility to use something other than the ratings reduction method discussed in Order No. 890, we clarify that the ratings reduction method is only an example of a simple method that could be used. Our intent is not to prohibit a transmission provider from using a more sophisticated method, so long as it is consistent with the reliability standards developed by NERC.		**changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: NA	practices to NERC MOD008. The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for TRM, 8/16/07 The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 3/31/08. Recommendation posted for 30-day formal comment period on April 8th. The recommendation was voted out of the EC on May 13.
	• Any additional business practice standards needed to complement the NERC TRM reliability standards (MOD008) created as a result of this effort (This item is a catchall section in case there are areas where business practices are needed as a result of the NERC TRM reliability standards. This item will require coordination with the NERC Order 890 reliability standards development).	WEQ 2008 Annual Plan Item 2(b)(iv)(3)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD008. The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for TRM, 8/16/07 The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments

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				3/31/08. Recommendation posted for 30-day formal comment period on April 8th. The recommendation was voted out of the EC on May 13.
301	Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)): • Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards (Paragraph 301 will require coordination with the NERC Order 890 reliability standards development) **Order 890-A:** 53. We clarify in response to NorthWestern that TRM may be used to accommodate the procurement of ancillary services used to provide service under the pro forma OATT. We deny as premature EPSA's and Williams' requests for clarification regarding the realtime determination and posting of ATC and AFC values, as well as posting of utilization of transmission provider's own system ETC. In Order No. 890, the Commission required an exchange of the data both for short and long-term ATC/AFC calculation that will increase the accuracy of ATC calculations.[33] The Commission also required that ATC be recalculated by all transmission providers on a consistent time interval, and in a manner that closely reflects the actual topology of the system, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data, and that NERC/NAESB revise the related reliability standard and business practices accordingly.[34] EPSA and William should address their concerns through the NERC and NAESB processes implementing these requirements. 60. Order No. 890 requires NERC and NAESB to develop a single set of ATC-related standards that will apply to all transmission providers, including RTOs and ISOs. We understand that the NERC ATC standard drafting team includes representatives from various industry sectors, including RTOs/ISOs, and we encourage NYISO to participate in the standard development process to provide NERC an opportunity to address its concerns. To the extent NYISO feels its concerns are not address in this process, it should bring the issue to the	WEQ 2008 Annual Plan Item 2(b)(v)(1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS has drafted several sets of language and is in the process of coordinating alignment with the NERC ATC Drafting Team. The ESS/ITS and BPS are drafting documents that will facilitate agreement on concepts/scope. The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 4/16/08. Recommendation posted for 30-day formal comment period on April 23rd.

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	Commission's attention on review of the resulting reliability standards. 101. The Commission directed public utilities, working through NERC and NAESB, to revise reliability standard MOD-001 to require ATC to be recalculated by all transmission providers on a consistent time interval and in a manner that closely reflects the actual topology of the system, e.g., generation and transmission outages, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data. The Commission stated that this process must also consider whether ATC should be calculated more frequently for constrained facilities. 104. The Commission agrees with Powerex that the standards adopted through the NERC and NAESB processes should serve as minimum or "no less frequent than" requirements to recalculate ATC. Transmission providers also must update their ATC calculation when they receive substantial and material changes in data, such as updated load forecasts, changes in topology and dispatch patterns, which may be more frequent than the NERC and NAESB standards would otherwise require. In the absence of substantial and material changes in data, transmission providers are not required to update ATC on a more frequent basis than the minimum frequency that the NERC and NAESB standards require, once implemented. The Commission will consider the adequacy of the time frame for ATC updates on review of these standards. 148. In Order No. 890, the Commission required transmission providers to make available, upon request, all data used to calculate ATC, TTC, CBM and TRM for any constrained posted path. We believe that this adequately addresses Constellation's request for access to modeling data used by the transmission provider. Specifically, we expect transmission providers to make available, upon request and subject to appropriate confidentiality protections and CEII requirements, the following modeling data: (1) load flow base cases and generation dispatch methodology; (2) contingency, subsystem, monitoring, change files and accompanying auxiliary files; (3) transient and dynamic stability simulation data and reports on flowgates which are not thermally limited; (4) list of transactions used to update the base case for transmission service request study; (5) special protection systems and operating guides, and specific description as to how they are modeled; (6) model configuration settings; (7) dates and capacities of new and retiring generation; (8) new and retired generation included in the model for future years; (9) production cost models (including assumptions, settings, study results, input data, etc.), subject to reasonable and applicable generator confidentiality limitations; (10) searchable transmission maps, including PowerWorld or PSSE diagrams; (11) OASIS names to Common Names table and PTI bus numbers; and, (12) flowgate and interface limits including limit category (thermal, steady state or transient, voltage or angular). We decline, however, to require the transmission provider to post this information on OASIS, as Constellation suggests. We conclude that making this information available on request provides sufficient transparency for customers without unduly burdening			

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	the transmission provider. 149. With regard to the modeling support information sought by Constellation, we believe much of this information should already be stated in each transmission provider's Attachment C. In Order No. 890, the Commission required each transmission provider to set forth in the Attachment C to its OATT the ATC calculation methodology used by the transmission provider. To the extent necessary, we clarify that the step-by-step modeling study methodology and criteria for adding or eliminating flowgates (permanent and temporary) is part of the ATC methodology that must be stated in the transmission provider's Attachment C. We direct any transmission provider that has failed to include this information in its Attachment C to include that information as part of the compliance filing directed in section II.C. If the transmission provider has already satisfied this obligation in a previous compliance filing, it should refer to that filing instead. 150. We deny as premature Constellation's request to require OASIS postings of additional model benchmarking and forecasting data/TSR study audit data. Such information would be utilized in the process of updating and benchmarking models to actual events, which is the subject of ongoing efforts to modify relevant reliability standards from the MOD and facilities design, connections and maintenance (FAC) groups. 152. We deny TDU Systems' request to require transmission providers to grant customers access to proprietary modeling software used to calculate ATC values. The Commission believes at this time that the requirements of Order No. 890 are sufficient to achieve the Commission's transparency goals without further requiring the disclosure of proprietary software.			
310	• Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards including any OASIS posting requirements to achieve the data exchange (Paragraph 310 will require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(v)(2)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	NERC will be addressing data exchange standards and will identify any new OASIS posting requirements or template query requirements which are needed in order to facilitate data exchange for ATC modeling On March 13, 2008 the ESS/ITS and BPS determined the work associated to this item has been completed by NERC and recommended no

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				further action be taken by NAESB**.** Recommendation posted for 30-day formal comment period on March 17th. The recommendation was voted out of the EC on May 13.
369	• Business practice standards that will set forth how transmission providers will post "explanations of the reason for a change in monthly and yearly ATC values on a constrained path." The standards will include a requirement that the transmission provider post the reason for the change in a narrative form. The posted information will include "the (1) specific events which gave rise to the change and (2) new values for ATC on that path (as opposed to all points on the network)." (Paragraph 369 will not require coordination with the NERC Order 890 reliability standards development) Although not specified in the WEQ 2008 AP, it is expected that this standard will also contain requirements associated with annotations when ATC remains at zero for six months or longer. **Order 890-A:** 124. We believe that E.ON U.S. overestimates the burden of complying with this requirement. Since TTC standardization is ongoing, it is impossible to identify with precision the steps that will need to be taken to comply with the posting requirement. The appropriate forum to raise concerns regarding the burden of particular TTC calculation requirements is in the NAESB standards development process. In any event, we would expect that the posting of narratives for changes in monthly and yearly ATC values as a result of a 10 percent change in TTC will be triggered mainly by topology changes resulting from transmission lines and generator in-service status, as well as new facilities additions, that are reported on OASIS. 125. We clarify in response to Southern that transmission providers do not need to list each and every circumstance or occurrence that impacts TTC values from the previous month or year and, instead, may list the primary events that give rise to the update. Again, we expect that TTC changes will generally result from topology changes and, therefore, the primary reasons for an update would be changes in schedules of transmission or generation additions, prolonged outages, or changes in maintenance schedules causing a TTC change of 10 percent. We agree with Southern that the transmission provider should post these narrative explanations on OASIS via a template and data element that is to be defined by NAESB. We	WEQ 2008 Annual Plan Item 2(b)(v)(3)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Voted out of subcommittee for formal comment on February 13, 2008. Approved by the EC via notational ballot on April 14th. Membership ratification completed on May 16th.

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	direct transmission providers, working through NAESB, to develop the OASIS functionality necessary for such postings. Pending completion of this work by NAESB, we direct transmission providers to post these narrative explanations as comments on OASIS.			
413	• Business practice standards for posting on OASIS of the "underlying load forecast assumptions for all ATC calculations" (Paragraph 413 will not require coordination with the NERC Order 890 reliability standards development) **Order 890-B:** 35. We clarify, however, that the Commission intended for transmission providers to post the underlying factors used to make load forecasts that have a significant impact on calculations, such as temperature forecasts, not all economic and other data that underlies each and every daily load forecast. Transmission providers must post a description of their load forecast method including how economic and weather assumptions are used in load forecasting. The Commission's intent is to increase transparency in the transmission provider's process of forecasting, providing assurance to customers that loads are consistently being forecast using methodologies which are not subject to daily manipulation to favor affiliates.	WEQ 2008 Annual Plan Item 2(b)(v)(4)	**These dates are dependent on NERC providing responses to questions forwarded to NERC by the BPS/ESS/ITS.** FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Voted out of subcommittee for formal comment on March 10, 2008. Approved by the EC via notational ballot on April 23rd. Recommendation was posted for membership ratification on June 25th.
405	• Business practice standards for posting on OASIS of the "actual daily peak load for the prior day." (Paragraph 405 will not require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(v)(5)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Voted out of subcommittee for formal comment on March 10, 2008. Approved by the EC via notational ballot on April 23rd. Recommendation posted for Membership Ratification on June 23rd.
	• Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13 (This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development).	WEQ 2008 Annual Plan Item 2 (b)(vi)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008	The ESS/ITS and BPS is in the process of coordinating alignment with the NERC ATC Drafting Team. On May 1, 2008, the subcommittee determined no additional standards were required for this work plan item. Posted for formal comments on May 5, 2008.

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			RATIFICATION: N/A	
	• Business practice standards to set forth the procedure for input on TTC and ATC methodologies and values. (During the Order 890 NERC and NAESB joint standards development effort, it was determined that the standards contained in MOD003 should be business practice standards instead of reliability standards. NERC has requested that NAESB adopt the standards as business practices via correspondence to Ms. McQuade, NAESB President.) This item will require coordination with the NERC Order 890 reliability standards development because the language to address this item is contained within a draft standard that addresses items that are dependent on NERC deliverables, i.e., the requirements to create an "ATC Information Link" on OASIS. There is no Order 890 cite for this item.	WEQ 2008 Annual Plan Item 2 (b)(vii)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Voted out of subcommittee for formal comment on March 13, 2008. Approved by the EC via notational ballot on May 2, 2008. Membership ratification period closes June 27, 2008. Recommendation was ratified by the membership.
	Develop any additional business practice standards to support transparency reporting and related functions that may be required as a result of the final order.	WEQ 2008 Annual Plan Item 2(c)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	The ESS/ITS and BPS continue to review the need for additional business practice standards. The ATC information list was posted for informal comment on January 22, 2008. 05-13-2008 - The BPS/ESS/ITS was directed by the EC to suspend activity on this item. ATC Information List has been assigned to a task force of the EC.
	Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources. (http://www.naesb.org/pdf3/weq_ec051308w2.doc)	WEQ 2008 Annual Plan Item 6(d)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Commissioner Wellinghoff letter Draft recommendation posted for informal comments on June17, 2008 Recommendation was voted out of subcommittee

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				on July 9th. Formal Comment period closes on August 11th.

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ESS/ITS ASSIGNMENTS				
	GROUP 0: RESALES			
815, FN 496	The OASIS business practices developed to align the existing NAESB standards with Order 890 will include the requirement that "all sales or assignments of capacity be conducted or otherwise posted on the transmission provider's OASIS on or before the date the reassigned service commences." The OASIS business practices will also conform to Footnote 496 of Order 890. The business practices will include the requirement that the assignee "execute a service agreement directly with the transmission provider." In addition, the business practices will include the requirement that the assignee pay "the transmission provider for service at the negotiated rate and the transmission provider will bill or credit the assignor with any the difference between the negotiated rate and the assignor's original rate. **Order 890-A:** 394. Reforms to the rules governing reassignments and associated reporting obligations also increase our regulatory oversight of the secondary market, allowing the Commission to effectively monitor that market for any attempts to exercise market power. All reassignments must now be conducted through or otherwise posted on OASIS and assignees must execute service agreements prior to the date on which service commences. Transmission providers must provide information regarding reassignments in their EQRs. As noted above, Commission staff will also closely monitor the quarterly reassignment-related data submitted by transmission providers and prepare a report on staff's findings for the Commission's consideration. The Commission takes seriously the possibility that resellers may attempt to exercise market power in the secondary market for transmission capacity. We continue to believe, however, that the regulatory protections in place and our increased oversight of this market will limit the potential for market power abuse during the period in which the price cap is lifted. There is no need for particularized market power studies regarding secondary transmission capacity, as suggested by TAPS. 408. As noted above, the Commission required in Order No. 890 that all sales or assignments of capacity be conducted through or otherwise posted on the transmission provider's OASIS on or before the date the reassignment commences. The Commission thus eliminated the ability of transmission customers to assign transmission rights to another party with subsequent notification to the transmission provider. The Commission also directed transmission providers, working through NAESB, to develop appropriate OASIS functionality to allow such postings. Transmission providers were not required to implement this new OASIS functionality or any related business practices until NAESB develops appropriate standards.	WEQ 2007 Annual Plan Item 2(a)(i)	FORMAL COMMENT: Posted for formal comment April 5, 2007 with comments due on May 4, 2007. WEQ EC VOTE: The WEQ Executive Committee adopted a revised recommendation during the May 8, 2007 WEQ EC meeting. RATIFICATION: The recommendation, as revised by the WEQ Executive Committee was posted for member ratification on June 22, 2007 with ballots due on July 23, 2007. The ratification results are posted on the NAESB website.	Completed. The final action is posted on the NAESB WEQ Final Actions page: 2007 WEQ Annual Plan Item 2 Final Action - Recommendation for Revision to Final Action R04006D to align the Resales Standards with Order 890 The Subcommittee believes the final action conforms with Order 890-A.

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	422. The Commission affirms the decision in Order No. 890 to require assignees to execute a service agreement with the transmission provider governing reassignments of transmission capacity prior to scheduling use of that capacity. We provide clarification of this requirement, however, in response to the concerns raised by petitioners. In Order No. 890, the Commission required that all reassignments be accomplished by the assignee executing a service agreement with the transmission provider that will govern the provision of reassigned service. The Commission did not intend to impose contracting obligations that are more onerous than the acquisition of primary transmission capacity, which may be accomplished through execution of a service agreement followed by scheduling on OASIS. We clarify that it is equally sufficient for an assignee to execute a service agreement governing its reassignments of capacity generally and to complete a particular assignment through the OASIS. However, as with reservations of primary transmission capacity, there remains a threshold requirement to execute a service agreement with the transmission provider in order to commit the assignee to abide by the terms and conditions of the transmission provider's OATT governing the reassignment of transmission service. 423. It would not be appropriate to relieve assignees of the obligation to execute a service agreement with the transmission provider since such agreements establish the necessary contractual relationship between the assignee and the transmission provider. As we explain above, sales of reassigned capacity now take place under the transmission provider's OATT and, thus, there must be a contractual relationship between these parties. This does not mean, however, that all of the terms and conditions of a particular assignment must be stated in the service agreement. Like short-term firm and non-firm reservations of primary capacity, the transmission provider and assignee may rely on OASIS to provide information regarding the reseller, quantity, and price associated with a particular reassignment of service. This information would then become part of the binding agreement between the transmission provider and assignee governing the assignment, just as confirmation of short-term firm and non-firm transactions on OASIS constitute binding contractual commitments. Because execution of a service agreement with the transmission provider governing reassignments of capacity is a threshold requirement for an assignee wishing to accomplish a particular reassignment on OASIS, Bonneville's concern regarding the failure of an assignee to return its service agreement is misplaced. The assignee in that instance would have no right to schedule a reassignment on OASIS since it has not first executed the appropriate service agreement with the transmission provider. 424. Some of the confusion regarding these contracting requirements may have been caused by the Commission's reference in section 23.1 of the revised pro forma OATT to a service agreement "that will govern the provision of reassigned service," which could be interpreted to refer to transaction-by-transaction service agreements for reassignments. Inclusion of the words "Long-Term Firm" in both the title of the form of service agreement			

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	and the attached specifications in the new Attachment A-1 to the pro forma OATT adopted in Order No. 890 may have added to the confusion by potentially implying that use of the service agreement is limited to long-term firm point-to-point transactions instead of also applying to short-term firm point-to-point and non-firm point-to-point reassignments, as intended by the Commission. We revise section 23.1 of the pro forma OATT and the title of Attachment A-1 to make clear that use of the form of service agreement for reassigned capacity, and associated posting of schedules and transaction information on OASIS, should be similar to the use of such agreements for primary capacity. 425. The execution of a service agreement by the assignee does not itself terminate the reseller's service agreement, as EEI argues. The reseller's service agreement remains in place, granting the reseller scheduling rights for the reserved capacity and obligating the reseller to pay for that reservation. During the term of the assignment, the reseller will continue to be billed under its agreement with the transmission provider. The assignment of service simply transfers to the assignee some or all of the reseller's scheduling rights for the period of the reassignment and, in return, obligates the assignee to pay the transmission provider the negotiated rate. In order to prevent over-recovery by the transmission provider, the transmission provider must therefore credit the reseller the reassignment rate, which leaves the reseller with the net difference between the resale rate and the reseller's original rate. If the assignee defaults and fails to pay for the reassigned capacity, the transmission provider should reverse the credit to the reseller to reflect the lack of payment by the assignee. 426. We disagree that these billing requirements are unduly burdensome. While it is true that the transmission provider may be required to bill at different rates, that is already the case under the pro forma OATT. Transmission providers are permitted to offer discounts from the rates stated in their OATT, provided they offer such discounts to all eligible customers. Offering discounts thus creates different rates for different customers depending on when they negotiate service. The transmission provider therefore should already have mechanisms in place to bill customers based on rates other than those stated in its OATT. In any event, the need to bill assignees directly for reassignments is inextricably linked to the decision to require that all reassignment transactions take place pursuant to the rate on file in the transmission provider's OATT, rather than bilateral agreements between customers. We therefore do not intend for the discount rule or the price ceilings otherwise stated in the transmission provider's OATT to apply to reassignments of capacity. We have revised schedules 7 and 8 of the pro forma OATT accordingly. 427. We clarify that, to the extent necessary, the costs incurred by the transmission provider to account and bill for reassignments of transmission capacity should be included in the transmission provider's cost of service, just like accounting and billing costs for any other service under the transmission provider's OATT. We decline MidAmerican's request to			

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	prohibit further assignments of reassigned capacity. Order No. 888 allowed for multiple reassignments under the pro forma OATT and MidAmerican does not justify departing from this practice. Just as the original transmission customer may find that it has excess capacity it can reassign, so may an assignee. Denying the assignee's right to further assign its scheduling rights would inhibit customers who value the capacity most from accessing it and thereby contradict the Commission goal of creating a competitive secondary market for transmission capacity. 428. With regard to OASIS modifications necessary to allow for the reassignment of transmission capacity, the Commission in Order No. 890 already directed transmission providers working through NAESB to develop appropriate OASIS functionality to allow for reassignment-related postings. We understand that this work is on-going and expect any necessary modifications to NAESB's business practices that are necessary to reflect our rulings in this order will be adopted prior to the submission of those standards for Commission review. In the interim, transmission providers should identify in their business practices any procedures necessary to accomplish the reassignment of capacity by their customers.			
	GROUP 1: POSTING OF ETC; ANNOTATIONS FOR ATC; LOAD FORECAST AND ACTUAL LOAD; RE-BID OF PARTIAL SERVICE; PRECONFIRMATION PRIORITY; and CONDITIONAL FIRM			
	Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority S&CP Requirements	WEQ 2008 Annual Plan Item 2(a)(i)(1)	FORMAL COMMENT: Sent during the 3rd Quarter 2007. WEQ EC VOTE: EC notational ballot due January 16, 2008. RATIFICATION: The ratification of the Recommendation will be completed during 1st Quarter 2008.	
1078	**Conditional Firm:** In Paragraph 1078 of Order 890, the Commission directed transmission providers to "assign short-term firm service to conditional firm customers as the service becomes available." The Commission also directed transmission providers to work with NAESB to "develop the appropriate communications protocols to implement this attribute of conditional firm service." NAESB will develop OASIS business practices (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1))that will implement the ability to assign short-term firm service to conditional firm customers. Development of communication protocols for conditional firm including tracking mechanism and regional variation. Need to review the tagging rules related to the use of conditional firm.	WEQ 2008 Annual Plan Item 2(a)(i)(2)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Initial working paper of draft requirements to be posted in April 2008. On April 4, 2008, the ESS/ITS voted to send this recommendation out for informal comments due April 11, 2008.

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	Order 890-A: 566. During non-conditional periods, conditional firm service is subject to pro rata curtailment consistent with curtailment of any other long-term firm service. During the hours or specific system conditions when conditional firm service is conditional, conditional firm service share the same curtailment priority as secondary network service. In such circumstances, transmission providers will be allowed to curtail only for reliability reasons and conditional firm customers during conditional curtailment hours will be curtailed only after all point-to-point non-firm customers have been curtailed. If the customer selects the annual hourly cap option, the transmission provider will have the flexibility to conditionally curtail the customer for any reliability reason during those hours, including but not limited to, the system condition(s) identified in the system impact study. 567. The Commission provided that short-term firm service reserved prior to the reservation of conditional firm service will maintain priority over conditional firm service in the periods when conditional firm service is conditional, i.e., when specified system conditions exist or conditional curtailment hours apply. Transmission providers were directed to work with NAESB to develop the appropriate communications protocol to allow for automatic assignment of short-term firm point-to-point service to conditional firm customers to the extent short-term service becomes available. Transmission providers need not implement this requirement until NAESB develops appropriate communications protocols. 569. Finally, the Commission recognized that there may be some regional variation in the way transmission providers approach the provision of conditional firm service beyond the minimum attributes that established in Order No. 890. The Commission directed transmission providers located in the same region to coordinate among themselves to develop business practices for implementation of the conditional firm service. In order to allow time for this regional coordination, the Commission directed transmission providers to implement these mechanisms and business practices within 180 days after the publication of this Final Rule in the Federal Register, or October 11, 2007. 585. We also agree with MidAmerican that a transmission provider's waiver of a reassessment for conditional firm or planning redispatch service does not constitute a waiver of all reassessments for the duration of the service, unless explicitly agreed to by the transmission provider. We reiterate, however, that only one reassessment may be performed in each two-year period of service. We also affirm that any waiver must be granted for similarly situated service, which would include conditional firm or planning redispatch service that is limited because of the same constraints or general system limitations. Such a waiver would be an act of discretion that must be posted on OASIS. Waiver of the reassessment presents an opportunity for discrimination among classes of customers on the part of the transmission provider and posting will provide eligible customers with an indicator of how often conditions or redispatch requirements have been reassessed.			Voted out of subcommittee for formal comment on June 24, 2008. Recommendation posted for 30-day formal comment period on June 25th.

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	Transmission providers are directed to develop uniform OASIS posting standards, in coordination with NAESB, for transmission providers to post information regarding waivers of the biennial reassessment for planning redispatch and conditional firm service.			
369	**Annotations for ATC:** OASIS Business Practice Standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) that will "require that the transmission provider post a brief, but specific, narrative explanation of the reason for a change in monthly and yearly ATC values on a constrained path." The posting requirements will include posting of "(1) specific events which gave rise to the change and (2) new values for ATC on that path (as opposed to all points on the network)."	WEQ 2008 Annual Plan Item 2(a)(i)(3)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Assigned to BPS/ESS/ITS (see above BPS/ESS/ITS item that reference WEQ 2008 AP Item 2(b)(v)(3)). Voted out of subcommittee for formal comment on February 13, 2008. Approved by the EC via notational ballot on April 14th. Membership ratification to be completed by May 16th. Ratified by the membership on 5/16/2008.
416	**Load Forecast and Actual Load:** OASIS Business Practice Standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) for the posting of "load forecasts and actual daily peak load for both system-wide load (including native load) and native load." **Order 890-B:** 35. We clarify, however, that the Commission intended for transmission providers to post the underlying factors used to make load forecasts that have a significant impact on calculations, such as temperature forecasts, not all economic and other data that underlies each and every daily load forecast. Transmission providers must post a description of their load forecast method including how economic and weather assumptions are used in load forecasting. The Commission's intent is to increase transparency in the transmission provider's process of forecasting, providing assurance to customers that loads are consistently being forecast using methodologies which are not subject to daily manipulation to favor affiliates.	WEQ 2008 Annual Plan Item 2(a)(i)(4)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Assigned to BPS/ESS/ITS (see above BPS/ESS/ITS item that reference WEQ 2008 AP Items 2(b)(v)(4) and (5)). Voted out of subcommittee for formal comment on March 10, 2008. Approved by the EC via notational ballot on April 23rd. Membership ratification to be completed by July 23rd.
1378	**Re-bid of Partial Service:** OASIS Business practice standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) for re-bid of partial service across a single Transmission Provider's system.	WEQ 2008 Annual Plan Item 2(a)(i)(5)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
				13. Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership on June 23rd
1392, 1401	**Pre-confirmation Priority:** Development of OASIS business practice standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) to prohibit "transmission customers from changing a request into a pre-confirmed request and requiring OASIS platforms to be accessible on non-Windows/Explorer computers." **Pre-confirmation Priority:** Development of OASIS Business Practice Standards and OASIS S&CPs so that "pre-confirmed non-firm point-to-point transmission service requests and short-term firm point-to-point transmission service requests" have priority though "longer duration requests for transmission service will continue to have priority over shorter duration requests for transmission service." The standards will be written such that pre-confirmation will serve as a "tie-breaker" when the requests are of equal duration.	WEQ 2008 Annual Plan Item 2(a)(i)(6)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May 13. Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership on June 23rd.
	Appendix C – OASIS Exemptions	WEQ 2008 Annual Plan Item 2(a)(i)(7)	FORMAL COMMENT: **Voted out of subcommittee 12/17/2007. Formal Comment period 12/19/2007 through 1/19/2008.** WEQ EC VOTE: Approved February 4, 2008 RATIFICATION: Ratification period to close 3/13/2008	Ratified by the membership on 3/13/2008.
	GROUP 2: METRICS; REDISPATCH COST POSTING			
413	**Metrics:** Business Practice standards s to "post on OASIS metrics related to the provision of transmission service under the OATT" including the posting of: • "the number of affiliate versus non-affiliate requests for transmission service that have been rejected"; • "the number for affiliate versus non-affiliate requests for transmission service that have been made";	WEQ 2008 Annual Plan Item 2(a)(ii)(1)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May 13.

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	These standards will also set forth in the above referenced posting requirements the length of the service request and the type of the service requested.			Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership on June 23rd
1318	**Metrics:** OASIS business practice standards to implement the standard performance (planning study) metrics set forth in Order 890, Paragraphs 1308-1317.	WEQ 2008 Annual Plan Item 2(a)(ii)(2)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May 13. Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership on June 23rd
1162	**Redispatch Cost Posting:** Business practices for redispatch cost postings: • The posting of redispatch information will also include the posting of each transmission provider's "monthly average cost of redispatch for each internal congested transmission facility or interface over which it provides redispatch service using planning redispatch or reliability redispatch under the pro forma OATT." • The business practice standards for redispatch cost postings will also include functionality for transmission providers to post "a high and low redispatch for the month" each internal congested transmission facility or interface over which it provides redispatch service. **Order 890-A:** 621. Transmission providers must post internal constraint or interface data for the month if any planning redispatch or reliability redispatch is provided during the month, regardless of whether the transmission customer is required to reimburse the transmission provider for those exact costs. Thus, if the transmission customer pays for planning redispatch pursuant to a negotiated fixed rate, the transmission provider is required to post and calculate the monthly average redispatch costs and the high and low costs in the month even though the transmission provider will bill the customer the fixed rate. The same posting requirement applies if the customer is paying a monthly "higher of" rate. The Commission concluded that the relevant reliability redispatch costs for posting purposes are those costs the	WEQ 2008 Annual Plan Item 2(a)(ii)(3)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May 13. Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership on June 23rd

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	transmission provider invoices network customers based on a load ratio share pursuant to section 33.3 of the pro forma OATT. The transmission provider must post this data on OASIS as soon as practical after the end of each month, but no later than when it sends invoices to transmission customers for redispatch-related services. The Commission directed transmission providers to work in conjunction with NAESB to develop this new OASIS functionality and any necessary business practice standards.			
	GROUP 3: NETWORK SERVICE ON OASIS			
385	Development of OASIS business practice standards and OASIS S&CPs for "transmission providers and network customers to use OASIS to request designation of new network resources and to terminate designation of network resources." Shall be posted on OASIS for 90 days and available for audit for a 5 year period.	WEQ 2008 Annual Plan Item 2(a)(iii)(1) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
385	The standards will include the ability to electronically query requests to designate and terminate network resources and will require development of OASIS templates and to allow for queries of all information provided with designation requests. **Order 890-B:** 209. We also conclude that concerns regarding the ability to verify or monitor the buyer's decision to designate a purchase of system power as a network resource are overstated in light of the clarification that the buyer and seller must be on the same transmission system. In Order No. 890, the Commission directed transmission providers, working through NERC, to develop OASIS functionality for the designation of network resources and for queries of information provided with designation requests. Parties to a sale of system power on the same transmission system will therefore have ready access to the treatment of the resource. Sellers also may rely on commitments made by the buyer to designate the purchase as a network resource.	WEQ 2008 Annual Plan Item 2(a)(iii)(2) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
1477	The standards will include the ability to mask information "about operating restrictions and generating cost on OASIS"	WEQ 2008 Annual Plan Item 2(a)(iii)(3) See also WEQ 2008 Annual	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.

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		Plan item 3(a)(ii)		
1477	Development of OASIS business practice standards and OASIS S&CPs that describe the procedural requirements for submitting designations over any new OASIS functionality. **Order 890-A:** 919. The Commission clarifies, in response to South Carolina E&G's request, that the language in paragraph 1521 of Order No. 890 is only meant to be a paraphrase of the more detailed attestation to be provided in the pro forma OATT itself. A network customer designating network resources should submit an attestation using the language set forth in sections 29.2(viii) and 30.2 of the pro forma OATT, as amended in Order No. 890, not the language of the preamble. A network customer is not permitted to merely reference the applicable section of the pro forma OATT when completing the attestation requirement. If the OASIS customer comment section does not currently allow enough space for a network customer to provide its attestation, transmission providers should modify, in coordination with NAESB, OASIS functionality to accommodate the full attestation. In the interim, the transmission provider should identify alternate means, such as by telefax or e-mail, for the network customer to provide the attestation.	WEQ 2008 Annual Plan Item 2(a)(iii)(4) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
1504	Development of OASIS business practice standards and OASIS S&CPs to specify how designated network service informational postings are posted on OASIS . Develop details of how the view, download, and query requirements for information posted regarding network resource designations informational postings.	WEQ 2008 Annual Plan Item 2(a)(iii)(5) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
1532	Development of OASIS business practice standards and OASIS S&CPs to set forth the "treatment of OASIS requests when the customer fails to provide the necessary attestation," when submitting a request to designate a new network resource. Attestation: Formatting of attestation information that will be provided on OASIS. **Order 890-B:** 182. The Commission grants rehearing to more accurately state the requirement to provide an attestation supporting the designation of network resources pursuant to sections 29.2(viii) and 30.2 of the pro forma OATT. In order to designate a network resource, section 30.7 of the Order No. 888 pro forma OATT required each network customer to demonstrate that (i) it owns or has committed to purchase generation pursuant to an executed contract or (ii) execution of a contract is contingent upon the availability of transmission service in order to	WEQ 2008 Annual Plan Item 2(a)(iii)(6) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.

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	designate a generating resource. In Order No. 890, the Commission adopted the attestation requirement as the means by which the network customer can make this demonstration, revising sections 29.2 and 30.2 accordingly. We affirm this requirement, consistent with the network customer's obligations under section 30.7, and grant rehearing of the Commission's statements in this proceeding indicating that the attestation can instead be submitted at the time a resource designation is confirmed, rather than requested. 183. We disagree with NRECA and TDU Systems that a customer submitting an attestation pursuant to section 29.2(viii) or 30.2 of the pro forma OATT must commit to purchase the resources for which designation is requested irrespective of the outcome of the network service request. Consistent with section 30.7, a network customer may attest that execution of a contract is contingent upon the availability of transmission service under Part III of the pro forma OATT. Network customers are therefore not required to commit to purchasing a resource prior to submitting a request to designate that resource.			
1541	Development of OASIS business practice standards and OASIS S&CPs to describe "the procedural requirements for submitting both temporary and indefinite terminations of network resources, to allow network customers to provide all required information for such terminations." These business practice standards will include the functionality set forth in Order 890, Paragraph 1541.	WEQ 2008 Annual Plan Item 2(a)(iii)(7) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
1541	Development of OASIS business practice standards and OASIS S&CPs to describe "the procedures for submitting and processing requests for concomitant evaluations of transmission requests and temporary terminations. **Order 890-B:** 188. In Order No. 890, the Commission directed transmission providers to evaluate as a single request a request for temporary undesignation and related requests for transmission service. Transmission providers were therefore directed to develop, working through NAESB, business practices allowing for electronic identification of related transmission service requests to be evaluated concomitantly with the request for temporary undesignation. This was appropriate in light of the Commission's decision to allow network customers to temporarily undesignate their network resources without forfeiting the right to use the resource at a specified point in the future, provided they pair the temporary undesignation with a request to redesignate the resource. 189. We find that similar procedures for permanent undesignations of network resources are unnecessary given the transmission provider's obligation to consider clustering transmission service requests at the request of customers. If a network customer or the transmission	WEQ 2008 Annual Plan Item 2(a)(iii)(8) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.

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	provider's merchant function wishes for the transmission provider to take into consideration the effect of a request to terminate a network resource on a concomitant request to designate another network resource, it may request the transmission provider to cluster the requests. As TranServ acknowledges, this will not alter the priority of the network customer or the transmission provider's merchant function with regard to any ATC that may be made available by undesignating the network resource.			
	GROUP 4: CONDITIONAL FIRM; PRE-EMPTION; REQUEST R05019; and REVISIONS TO STANDARD 9.7			
1407	**Pre-emption:** Revise OASIS business practice standards and OASIS S&CPs so that "a new pre-confirmed request for transmission service would preempt a request of equal duration that has been accepted by the transmission provider but not yet confirmed by the transmission customer." It is the expectation that the business practice standards to address preemption will be developed in conjunction with NAESB Request No. R05019 to modify OASIS standards and OASIS S&CPs to clearly document the procedures used to implement the displacement/interruption terms of the Pro Forma tariff. This is consistent with NAESB Standard WEQ 001-4.25. **Order 890-A:** 814. The Commission affirms the decision in Order No. 890 not to change the "first-come, first served" nature of the reservation process and the right of first refusal. These policies have worked well in the past and, as we explain in Order No. 890, benefit transmission providers and customers alike by facilitating the administration of the reservation process and removing confusion about how to comply. 815. We disagree with Duke and TranServ that the right of first refusal policies should be revised based on complex hypotheticals involving the preemption of multiple short-term reservations. The complexities pointed to by these commenters do not by themselves warrant changing the right of first refusal rule. Even though we recognize the potential for complexities to arise under the right of first refusal rule, we believe them to be relatively limited. In the off-chance that multiple eligible customers with short-term reservations choose to exercise their right of first refusal for the same capacity simultaneously, the Commission believes that they should have a right to do so. 816. We therefore decline to expand upon the language of the pro forma OATT to account for every factual scenario that could arise under sections 13.2 and 14.2 of the pro forma OATT. Sections 13.2 and 14.2 of the pro forma OATT set forth adequate guidance for transmission providers to fairly administer competing requests, including the priorities for determining which reservations or requests trump one another as well as the timeframes for eligible customers to respond to competing requests. As noted above, we recognize that certain unique cases can present difficult allocation issues, but conclude that these extreme	WEQ 2008 Annual Plan Item 2(a)(iv)(1)	**REQUEST FOR RECONSIDERATION PENDING AT FERC MAY IMPACT TARGET DATES.** FORMAL COMMENT:3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started

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	cases arise infrequently in the normal course of business. In the vast majority of cases, we believe the right of first refusal rules are efficient and easy to administer without further amending the governing tariff language, as Bonneville and Southern suggest. 817. To the extent necessary, the Commission clarifies that a "competing request" under sections 13.2 and 14.2 of the pro forma OATT may include a transmission service request that overlaps with only part of another existing transmission service reservation since both requests cannot be granted simultaneously. Accordingly, a "competing request" for purposes of sections 13.2 and 14.2 may also include a transmission service request for which transmission capacity cannot be accommodated without preempting one or more existing transmission reservations of parts thereof. 818. In response to TranServ and Duke, we clarify that sections 13.2 and 14.2 allow an eligible customer to retain its original reservation by matching the competing service request's cost or duration terms exactly or by exceeding one or more of the terms of a competing transmission service request. Since any "match" by an eligible customer in response to a potentially preempting request, by definition, either exceeds the costs, duration or both of the eligible customer's original reservation, we do not believe eligible customers opting to match a competing request have a strong incentive, if any, to "match" a competing request with terms that exceed the competing request. Nevertheless, we do not see any harm resulting from a match that exceeds the exact terms of a competing request and therefore believe it would not be appropriate to preclude the ability of eligible customers to make such a request. 819. With regard to reassignments of capacity in the secondary market, we clarify that the associated right of first refusal under sections 13.2 and 14.2 of the pro forma OATT to match a competing transmission service request applies to the primary transmission service, not the reassignment of scheduling rights. Using TranServ's example, the reassignment of one day of a customer's weekly service would not cause the assignor or the assignee to match a competing three day request for service since the initial one week reservation already exceeded the competing request. The fact that one day of service has been reassigned does not alter the assignor's entitlement to use service for the remaining week reserved. **Order 890-B:** 161. The Commission declines to address in this rulemaking proceeding how transmission providers should resolve complicated and fact-specific scenarios such as the cascading rights of first refusal described by Duke. Sections 13.2 and 14.2 of the pro forma OATT provide adequate guidance for transmission providers to fairly administer the vast majority of competing requests, including priorities for determining which reservations or requests trump one another as well as the timeframes for eligible customers to respond to competing			

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	requests. As the Commission explained in Order No. 890-A, we expect that more complex circumstances such as those suggested by Duke will be relatively limited and, therefore, are best addressed on a case-by-case basis. Transmission providers remain free, however, to develop through the NAESB process standard procedures for processing complicated request scenarios.			
	NAESB Request No. R05019: During the work to address FERC Order 890, the ESS/ITS will also use the opportunity to modify OASIS standards and S&CP to clearly document the procedures used to implement the displacement/interruption terms of the Pro Forma tariff as requested in NAESB Request No. R05019	WEQ 2008 Annual Plan Item 2(a)(iv)(2) R05019	**REQUEST FOR RECONSIDERATION PENDING AT FERC MAY IMPACT TARGET DATES.** FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started
1269	**Revisions to Standard 001-9.7:** NAESB will continue to work to revise NAESB WEQ business practice standard WEQ 001-9.7 (which addresses rollover rights for Redirected transmission service) to be consistent with the Commission's policies. **Order 890-A:** 697. Pursuant to Section 22 of the pro forma OATT, a transmission customer taking firm point-to-point service may modify its receipt and delivery points, i.e., redirect its service, on either a non-firm or firm basis. In Order No. 676, the Commission adopted the "Standards for Business Practices and Communication Protocols for Public Utilities" developed by the NAESB's Wholesale Electric Quadrant (WEQ). The WEQ standards include standards addressing requirements for redirects on both a firm and non-firm basis, all of which were incorporated by reference into the Commission's regulations except for WEQ Standard 001-9.7, which addressed the impact of redirects on the rollover rights of a long-term transmission customer. Order No. 676 directed the WEQ to reconsider WEQ Standard 001-9.7 and develop a revised standard consistent with Commission policy. 698. In Order No. 890, the Commission affirmed reliance on the NAESB process to develop business practices implementing the Commission's redirect policy. The Commission also determined that the reforms adopted in Order No. 676, in combination with the OATT-related reforms adopted in this proceeding, were adequate to ensure that transmission providers do not engage in undue discrimination when a customer seeks to modify its receipt and delivery points on a firm basis. With respect to the effect of redirects on rollover rights, the Commission affirmed its policy allowing a redirect of firm, long-term service to retain rollover rights, even if the redirect is requested for a shorter period. The Commission concluded that a transmission customer should not have to choose between maintaining its	WEQ 2008 Annual Plan Item 2(a)(iv)(3)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	On February 11-12, 2008, the ESS/ITS voted to send this recommendation out for informal comments due March 25, 2008.

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	rollover rights and redirecting on a firm basis. The Commission noted, however, that any change to a delivery point would be treated as a new request for service for purposes of determining availability of capacity. As a result, a redirect right does not grant the customer access to system capacity or queue position different from other customers submitting new requests for service. The Commission also provided guidance regarding the processing of, and pricing for, redirected service. 700. If the Commission decides to maintain rollover rights for redirects, MISO proposes the following limitations and requests the Commission to direct NAESB to draft its business practices accordingly. First, MISO suggests that the primary path agreement should have a term of at least five years for any rollover rights to attach. Second, MISO requests that any redirect must be for firm service for one year or longer. If the redirect is for a shorter period, MISO contends that the rollover rights should remain with the original path. Third, MISO requests redirected service to terminate on the same date as the parent service so as to maintain the timing for execution of rollover rights. Finally, MISO suggests that in order to execute a rollover right the redirected service must be requested and granted prior to the one-year deadline for the customer to request rollovers along the original path. 702. TranServ also requests clarification regarding the requirement for the rollover right to follow the redirect, regardless of the duration of the redirect. TranServ questions whether a redirect of a long-term firm service reservation for one day qualifies that customer for rollover rights on the redirected service points. TranServ suggests that the Commission instead restrict rollover rights on redirected service points to redirects of five years or longer and further require that the redirect be co-terminus with the original request being redirected. TranServ argues that more guidance regarding implementation of the rollover and redirect policies will facilitate the NAESB standards development process. 704. The Commission denies petitioners' requests to amend the rights of rollover customers to redirect their service. Under section 22.2 of the pro forma OATT, a request for a firm redirect must be treated like a request for new transmission service. As a new request for service, each redirect request is subject to the availability of capacity and subject to the possibility that the transmission provider may not be able to provide rollover rights on the new redirected path. The transmission provider is required to offer rollover rights to a customer requesting a firm redirect only if rollover rights are available on the redirected path, i.e., to the extent not restricted based on reasonable forecasts of native load growth or preexisting contracts that commence in the future. 705. As the Commission explained in Order No. 890, rollover rights follow the redirect regardless of the duration of the redirect. A transmission customer making a firm redirect request does not convert its original long-term firm transmission service agreement into two short-term service agreements, nor does it lose its rollover rights under its long-term firm transmission service agreement. At the same time, a customer can exercise its rollover right			

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	only at the end of the contract. Thus, if a customer with rollover rights chooses to redirect its capacity for less than the full remaining term of the contract, absent some further request to redirect, the original path will automatically be reinstated and rollover rights would remain on only the original path. By contrast, if the customer chooses to redirect its capacity until the end of its contract, the customer would have rollover rights along only the redirected path, and only to the extent not restricted based on native load growth or future contracts along the redirected path. 706. We therefore reject requests to restrict rollover rights to longer-term redirects. A long-term transmission customer may request multiple, successive redirects for firm service. This discretion is limited by the fact that each successive request is treated as a new request for service in accordance with section 17 of the pro forma OATT. Each request is therefore subject to the availability of capacity and subject to the possibility that the transmission provider may not be able to provide rollover rights on the new, redirected path. If the customer has not been granted rollover rights for a redirect that extends to the end of its contract, the redirected service will terminate on the same date as the parent service. 707. We also reiterate that a customer cannot exercise any rollover rights unless it first has provided the appropriate notice to the transmission provider. If a customer requests and is granted a rollover right prior to the relevant notice deadline (60 days for pre-Order No. 890 agreements or one year for all others) and subsequently requests and is granted a redirect for firm service for the remainder of the contract term (i.e., within the notice period), the new reservation governs the rights at the new receipt and delivery points and the customer can obtain rollover rights with respect to the redirected capacity to the extent rollover rights are available for the redirected points. If, however, a customer fails to request a rollover right prior to the relevant notice deadline, the customer forfeits rollover rights along the current or any redirected path. 708. We clarify, to the extent necessary, that transfer capability is not freed up for earlier queued service requests until a redirect has been granted. A redirect request must be evaluated in accordance with section 17 of the pro forma OATT using the same system assumptions and analysis applicable to any other new request for service, including whether sufficient ATC exists to accommodate the request. If there is insufficient ATC to offer service to customers in the queue, and an existing customer requests redirected service, any increase in ATC along the original path is contingent upon the acceptance and confirmation of the redirect. It cannot be assumed at the time of a redirect request that the transmission provider will grant the request.			
	GROUP 5: PARAGRAPH 1377			
1377	NAESB will develop business practice standards to facilitate the coordination of requests across multiple transmission systems using the principles set forth in Paragraph 1377 of	WEQ 2008 Annual Plan	FORMAL COMMENT: 4th	Not Started

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	Order 890. Develop S&CPs related to coordination of request across multiple transmission systems. **Order 890-A:** 762. The Commission also required transmission providers working through NAESB to develop business practice standards to better coordinate transmission requests across multiple transmission systems. In order to provide guidance to NAESB, the Commission articulated the principles that should govern processing across multiple systems. The Commission further required transmission providers working through NAESB to develop business practice standards to allow a transmission customer to rebid a counteroffer of partial service so the transmission customer can take the same quantity of service for linked transmission service requests across multiple systems. The Commission explained that the transmission customer should not be required to take the same quantity of service across consecutive transmission service requests and, instead, it should simply have the option to do so. 766. The Commission affirms the decision in Order No. 890 to rely on the NAESB process to develop business practices to govern the processing of transmission requests across multiple transmission systems. We decline to dictate at this time, beyond those principles outlined in Order No. 890, the particular practices that must be implemented. It is more appropriate to allow transmission providers working through NAESB, in the first instance, to consider how best to ensure coordination across multiple systems. It is also appropriate to give NAESB an open timeframe to develop these standards since they must be broad enough to account for the complexities of coordinating multi-system transmission service requests.	Item 2(a)(v)(1)	Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	
1378	**Re-bid of Partial Service:** OASIS Business practice standards for re-bid of partial service across multiple Transmission Providers' systems. NAESB will develop business practice standards to "allow a transmission customer to rebid a counteroffer of partial service so the transmission customer is allowed to take the same quantity of service across all linked transmission service requests.	WEQ 2008 Annual Plan Item 2(a)(v)(2)	FORMAL COMMENT: 4th Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started
	GROUP 6: MISCELLANEOUS			
1390	NAESB plans to review the existing business functions set forth in the NAESB WEQ standards to determine if changes should be made to address Paragraph 1390 of Order 890. FERC: OATT is sufficient to allow a Transmission Provider to manage situations where the Transmission Customer modifies its application for service to the point that the request is "meaningfully different" than initial request. ESS/ITS: need to review if this has any impact on business functions.	WEQ 2008 Annual Plan Item 2(a)(vi)(1)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
1627	Development of OASIS business practice standards and OASIS S&CPs for "the posting of additional curtailment information on OASIS" via a "detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. Posting of curtailment information on OASIS: develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. **Order 890-A:** 973. The Commission did not propose in the NOPR, or adopt in Order No. 890, any changes to the terms and conditions under which a transmission provider may curtail service to maintain reliable operation of the grid, as set forth in sections 13.6 and 14.7 for point-to-point service and section 33 for network service. The Commission did, however, conclude that the posting of additional curtailment information is necessary to provide transparency and allow customers to determine whether they have been treated in the same manner as other transmission system users, including customers of the transmission provider. Accordingly, the Commission required transmission providers, working through NAESB, to develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments, including all circumstances and events contributing to the need for a firm service curtailment, specific services and customers curtailed (including the transmission provider's own retail loads), and the duration of the curtailment.	WEQ 2008 Annual Plan Item 2(a)(vi)(2)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started
1005	**Redispatch Cost Posting:** Business practices for redispatch cost postings: The business practice standards for redispatch cost postings will include OASIS business practices and any needed additions or revisions to the OASIS Standards & Communication Protocols (S&CPs) to allow for posting of third party offers of planning redispatch services. The business practice standards developed for redispatch cost postings may affect the existing NAESB business practice standards for Transmission Loading Relief. (moved from Group 2) **Order 890-A:** 568. Transmission providers also were directed to work with customers to facilitate the use of third party generation, where available, in provision of planning redispatch. To facilitate provision of redispatch service by third parties, the Commission further directed transmission providers, working through NAESB, to modify their OASIS sites and develop any necessary business practices to allow for posting of third party offers to provide planning redispatch. Again, transmission providers were not required to implement the new OASIS functionality and any related business practices until NAESB develops appropriate standards. **Order 890-B:**	WEQ 2008 Annual Plan Item 2(a)(vi)(3)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
	131. In Order No. 890, the Commission directed transmission providers to modify their OASIS sites to allow for posting of third-party offers for planning redispatch and to work with NAESB to develop the OASIS functionality and any necessary business practice standards to allow for third-party planning redispatch. The Commission noted that provision of third party planning redispatch required coordination between the customer, transmission provider and reliability coordinator, but determined that the customer bears the burden to ensure that the necessary contractual and technical arrangements are in place to maintain reliability.			
243-244	**Posting of ETC:** OASIS business practice standards and S&CPs necessary to implement the Business Practice Standards developed to complement NERC Reliability Standards for **Existing Transmission Commitment (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard. (moved from Group 1)* *Requirements for a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses" is assigned to BPS/ESS/ITS (see above BPS/ESS/ITS item that references WEQ 2008 AP Items 2(b)(ii)(2)).	WEQ 2008 Annual Plan Item 2(a)(vi)(4) and 2(a)(iv)(4)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Started May 15, 2008. Task has been reassigned to BPS/ESS/ITS. Recommendation was voted out of subcommittee on June 17, 2008. Formal comment period closes on July 21, 2008.
	GROUP 7: Tagging for Conditional Firm Service, Submittal Windows			
Order 890-A, para-graph 592	**Tagging for CFS:** Within 180 days of Order 890-A publication, develop tracking capabilities and business practices for tagging for implementation of conditional firm service. **Order 890-A:** 592. We agree with petitioners that the NAESB rules regarding tagging do not allow a transmission provider to change the tag of a transmission customer. That is why, in Order No. 890, the Commission directed transmission providers to coordinate with other transmission providers in their regions to develop their own business practices to implement the tagging and tracking of conditional firm service. Upon consideration of petitioners' concerns, we grant rehearing to require transmission providers, in coordination with NERC and NAESB, to develop within 180 days of publication of this order in the Federal Register a consistent set of tracking capabilities and business practices for tagging for implementation of conditional firm service. We agree with petitioners that a consistent set of practices followed by the industry will reduce transmission provider discretion and bring uniformity in implementing conditional firm service. In the interim, the existing business practices of each transmission provider for tracking and tagging conditional firm service shall remain in effect.	WEQ 2008 Annual Plan Item 2(a)(vii)(1)	FORMAL COMMENT: WEQ EC VOTE: RATIFICATION:	Assigned to the ESS/ITS. Order 890-A publications date: January 16, 2008. On April 4, 2008, the ESS/ITS voted to send this recommendation out for informal comments due April 11, 2008. Recommendation posted for 30-day formal comment period on June 25th.

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
Order 890-A, para-graph 805	**Submittal Windows:** Standardized practices for allocating capacity among requests received during a submittal window. **Order 890-A:** 805. The Commission recognizes that developing methods to allocate capacity among requests received during a submittal window may require detailed procedures, particularly when transmission requests received simultaneously exceed available capacity. As the Commission explained in Order No. 890, however, we believe that each transmission provider is in the best position to develop allocation procedures that are suitable for its system. This does not preclude transmission providers from working through NAESB to develop standardized practices, as suggested by Southern. For example, as we pointed out in Order No. 890, allocation methods such as that used by PJM to allocate monthly firm point-to-point transmission service could provide useful guidance in developing general allocation procedures.	WEQ 2008 Annual Plan Provisional Item 7	FORMAL COMMENT: WEQ EC VOTE: RATIFICATION:	

WEQ ESS/ITS & BPS 890 Progress Report

(November 27, 2008 Filing)
Based on WEQ 2008 Annual Plan
As of July 30, 2008

Annual Plan Item	Annual Plan Item	Underway	Scheduled	Concept Discussion	Draft Recommen-dation	Subcommittee Review	Post Informal Comments	Review Comments	Subcommittee Final Review	Subcommittee Approval	NAESB Clean-up	Post for Formal Comments
2.a.i.3	Annotations For ATC Business Practice Stan											
2.a.i.4	Load Forecast And Actual Load Business Pra											
2.b.ii.1	Develop the Business Practice Standards cor											
2.a.iv.4	Posting of ETC: OASIS business practice sta											
2.a.vi.4	Posting of ETC: OASIS business practice sta											
2.b.ii.2	Business practice standards for accounting fo											
2.b.iii.1	Determine if business practice standards are											
2.b.iii.2	Business practice standards that include an C											
2.b.iii.3	Any additional business practice standards ne											
2.b.iv.1	Transmission Reliability Margin (TRM): Busi											
2.b.iv.2	The business practice standards will include s											
2.b.iv.3	Any additional business practice standards ne											
2.b.v.1	Business practice standards to address the f											
2.b.v.2	Business practice standards for data exchang											
2.b.v.3	Business practice standards that will set forth											
2.b.v.4	Business practice standards for posting on O											
2.b.v.5	Business practice standards for posting on O											
2.b.vi	Business practice standards to complement N											
2.b.vii	ATC Information Link/Transition of MOD-003											
2.c	Develop version 1 business practice standard											
6.f	Modify WEQ-001 to reflect in the definition of											

LEGEND:

Completed Prior to May EC Meeting

Completed since May EC Meeting

OPEN ACTION ITEMS

BPS/ESS/ITS Action Items								
Issue #	**Item Number**	**Status**	**Description**	**Assigned to**	**Dates**			**Notes**
		O = Open					Meeting	
	(Request Number or	C = Closed					When will	
	Annual Plan Number)	H = On Hold			Assigned	Due	be Addressed	
78		H	Using the List of ATC Information, begin addressing which items should be confidential based on commercial concerns	Subcommittee				5/13/2008 On Hold pending direction from the EC.
99		C	Approve BPS/ESS/ITS 02/13/2008 meeting minutes	Subcommittee	2/13/2008			Meeting Minutes were approved at the July 30th Meeting.
100		C	Post Final BPS/ESS/ITS 02/13/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 99.
103		O	Approve BPS/ESS/ITS 02/21-22/2008 meeting minutes	Subcommittee	2/22/2008			
104		O	Post Final BPS/ESS/ITS 02/21-22/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 101.
141		C	Post Final Joint NERC/NAESB 4/7/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 140.
142		C	Approve BPS/ESS/ITS 04/07/2008 meeting minutes	Subcommittee				Meeting Minutes were approved at the July 30th Meeting.
143		C	Post Final BPS/ESS/ITS 04/07/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 142.
145		O	Review NERC MODs once finalized to confirm that ATC postings at a minimum are consistent with the NERC recalculations.	Co-Chairs NAESB Staff	4/16/2008			Documents need to be reviewed after the NERC Mods have been finalized.
151		O	Approve Joint BPS/ESS/ITS 4/16-17/2008 meeting minutes	Subcommittee	4/17/2008			
152		O	Post Final Joint Joint BPS/ESS/ITS 4/16-17/2008 meeting minutes	NAESB Staff	4/17/2008			Action item is dependent on the completion of Action Item 151.
165		O	Approve Joint BPS/ESS/ITS 5/14-16/2008 meeting minutes	Subcommittee	5/16/2008			
166		O	Post Final Joint Joint BPS/ESS/ITS 5/14-16/2008 meeting minutes	NAESB Staff	5/16/2008			Action item is dependent on the completion of Action Item 165.

OPEN ACTION ITEMS

BPS/ESS/ITS Action Items								
Issue #	**Item Number**	**Status**	**Description**	**Assigned to**	**Dates**			**Notes**
		O = Open					Meeting	
	(Request Number or	C = Closed					When will	
	Annual Plan Number)	H = On Hold			Assigned	Due	be Addressed	
171		O	Approve Joint NERC NAESB meeting minutes from 5/29/2008	Subcommittee	5/29/2008			
172		O	Post Final Joint NERC NAESB meeting minutes from 5/29/2008	NAESB Staff	5/29/2008		6/23/2008	Action item is dependent on the completion of Action Item 171.
173		O	Approve Joint BPS/ESS/ITS 5/29/2008 meeting minutes	Subcommittee	5/29/2008			
174		O	Post Final Joint Joint BPS/ESS/ITS 5/29/2008 meeting minutes	NAESB Staff	5/29/2008			Action item is dependent on the completion of Action Item 173.
178		O	Approve Joint BPS/ESS/ITS 6/12-13/2008 meeting minutes	Subcommittee	6/13/2008			
179		O	Post Final Joint Joint BPS/ESS/ITS 6/12-13/2008 meeting minutes	NAESB Staff	6/13/2008			Action item is dependent on the completion of Action Item 178.
185		O	Approve Joint BPS/ESS/ITS 6/17-18/2008 meeting minutes	Subcommittee	6/18/2008			
186		O	Post Final Joint Joint BPS/ESS/ITS 6/17-18/2008 meeting minutes	NAESB Staff	6/18/2008			Action item is dependent on the completion of Action Item 185.
194		O	Approve Joint BPS/ESS/ITS 7/8 through 7/9 meeting minutes	Subcommittee	7/9/2008			
195		O	Post Final Joint BPS/ESS/ITS 7/8 through 7/9 meeting minutes	NAESB Staff	7/9/2008			Action item is dependent on the completion of Action Item 194.
202		C	Follow-up with BPS (TLR Drafting team about possible changes needed to support CBM Usage Tracking)	Ed Skiba	7/17/2008			7/29 -Discussed changes to WEQ 008 and they were in agreement with adding the changes to the CBM recommendation rather than the TLR recommendation that was currently being drafted. Email from chair of NERC TLR standards drafting team did not foresee and impact to them. Changes for the IDC are currently being tested.

OPEN ACTION ITEMS

BPS/ESS/ITS Action Items								
Issue #	**Item Number**	**Status**	**Description**	**Assigned to**	**Dates**			**Notes**
		O = Open					Meeting	
	(Request Number or	C = Closed					When will	
	Annual Plan Number)	H = On Hold			Assigned	Due	be Addressed	
203		C	Create Agenda for July 30th meeting	Co-Chairs	7/17/2008	7/23/2008		Agenda was posted in advance of meeting.
204		C	Check on Southern Co approach for paying for CBM	JT Wood	7/17/2008		7/30/2008	7/30 - CBM recommendation was voted out of subcommittee on July 30th an update on this action item is no longer required.
205		O	Approve Joint BPS/ESS/ITS 7/17 meeting minutes	Subcommittee	7/17/2008			
206		O	Post Final Joint BPS/ESS/ITS 7/17 meeting minutes	NAESB Staff	7/17/2008			Action item is dependent on the completion of Action Item 205.
207		O	Approve Joint NERC/NAESB 7/17/2008 meeting minutes	Subcommittee				
208		O	Post Final Joint NERC/NAESB 7/17/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 207.
209		C	Update CBM Requirements Recommendation	Paul Sorenson	7/16/2008		7/30/2008	Action item is dependent on the JISWG making a decision on changes to Coordinate Interchange. 7/30 - Document was updated on 7/18 and then again on 7/28.
210		O	Approve Joint BPS/ESS/ITS 7/30 meeting minutes	Subcommittee	7/30/2008			
211		O	Post Final Joint BPS/ESS/ITS 7/30 meeting minutes	NAESB Staff	7/30/2008			Action item is dependent on the completion of Action Item 210.
212		O	Post Agenda for NERC NAESB Joint ATC/AFC Meeting	Co-Chairs NAESB Staff	7/30/2008	7/4/2008		
213			Next number to be assigned					

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via email, August 12, 2008

TO: Mason Emnett, Michael Goldenberg, Ryan Irwin, and Bill Lohrman
FROM: Jonathan Booe
RE: NAESB Background Materials for Meeting August 13, 2008

Please find below the Order 890 and Order 698 items to be included in the August filing.

DEADLINE RELATED ORDER 890 ITEMS

2008 WEQ ANNUAL PLAN ITEM	DESCRIPTION	STATUS
2.c	Order 890 Modifications to WEQ-001 and Attachment	Ratified December 19, 2007 (Minor Corrections applied February 27, 2008)
2.b.v.3 & 2.a.i.3	ATC/TTC Narratives	Ratified May 16, 2008
2.a.i.4, 2.b.v.4, and 2.b.v.5	Load Forecast and Actual Load	Ratified July 23, 2008
2.b.vii	ATC Information Link	Ratified June 27, 2008
2.b.v.2	Data Exchange for ATC Modeling	No Action – Addressed in NERC standards
2.b.iv.1-3	TRM	No Action – Addressed in the ATC Information Link & ESS/ITS's Group 1 (Conditional Firm, Annotations for ATC, Load Forecast and Actual Load, Rebid of Partial Service, and Preconfirmation Priority)
2.b.v.1	ATC and AFC Calculation Methodologies	Awaiting EC Action – Recommending No Action – Addressed in the ATC Information Link & Order 890 Modifications to WEQ-001 (with minor corrections 2/27/08)
2.b.vi	BPS to complement NERC Supplemental SAR	Awaiting EC Action – Recommending No Action – Per discussions with NERC and MOD003 was addressed by the ATC Information Link
2.b.ii.2	Postbacks and Counterflows	Awaiting EC Action - Comment Period Ended June 23, 2008
2.a.iv.4, 2.a.vi.4, and 2.b.ii.1	ETC	Awaiting EC Action – Comment Period Ended July 21, 2008
2.c	ATC Information List**	Awaiting EC Action
2.a.i.2 & 2.a.vii.1	Conditional Firm	Awaiting EC Action – Comment Period Ends July 25, 2008
2.b.iii.1-3	CBM**	Awaiting EC Action - Out for Formal Comment Period Ending September 5, 2008
2.b.i.2	Remaining requirements documented in R05004 and R05004A	Awaiting EC Action – Recommending No Action Comment Period Ends August 11, 2008

** These items will be filed subsequently

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NON-DEADLINE RELATED ORDER 890 ITEMS

2008 WEQ ANNUAL PLAN ITEM	DESCRIPTION	STATUS
2.a.i.1	Group 1: Conditional Firm; Annotations for ATC; Load Forecast and Actual Peak Load; Rebid of partial Service; Preconfirmation Priority; and Conditional Firm - Attachment 1 (S&CP) – Attachment 2 (Data Dictionary) – Attachment 3 (Implementation Guide)	Ratified February 29, 2007 (February 27, 2008 minor corrections applied)
2.a.i.7	OASIS Exemptions Appendix C and Attachment	Ratified March 13, 2008
2.a.ii.1-3 & 2.a.i.5-6	Group 2: Metrics Redispatch Cost Posting & WEQ-001 Changes for Rebid of Partial Service and Preconfirmation Priority	Ratified June 23, 2008
6.d	Incorporating Demand Resources into Certain Ancillary Services Definitions	Awaiting EC Action – Comment Period Ends August 11, 2008

ORDER 698 ITEMS

2008 WGQ ANNUAL PLAN ITEM	DESCRIPTION	STATUS
4.a.i	Business Practices for Indexed Base Pricing for Capacity Release	Out for Ratification – Due August 25, 2008
4.a.ii	Technical Implementation of Business Practices for Indexed Base Pricing for Capacity Release	In Development in the WGQ IR and Technical Subcommittees
4.b.i	Business Practices to allow for increased receipt and delivery point flexibility	Out for Ratification – Due August 25, 2008
4.c.i	Modifications to the existing intra-day nomination timeline	No Action – Approved by the WGQ Executive Committee July 14, 2008

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NAESB DSM-EE ACTIVITY SUMMARY
MAY 30, 2008

DSM-EE PROJECT – ASSIGNED TO RETAIL GAS, RETAIL ELECTRIC AND WHOLESALE ELECTRIC:

- **April 11, 2007:** Several representatives of the NAESB WEQ, REQ, and RGQ as well as representatives of the US Department of Energy, US Environmental Protection Agency, FERC, and other industry experts met at the Department of Energy offices in Washington, D.C. to discuss the NAESB effort to draft business practices for Demand Side Management and Energy Efficiency. Ongoing Energy Efficiency and DSM projects and programs by other groups (such as NAPEE) were reviewed by the meeting attendees. The following resolution outlines the scope of the initial effort by NAESB to draft business practice standards for these topics: It was decided that NAESB should begin its standards development focus on measurement and verification of energy savings and peak demand reduction from both a wholesale and retail electric market perspective. A future schedule of meetings for DSM and Energy Efficiency should be posted on the NAESB website shortly.
- **May 24, 2007:** 75 NAESB members, FERC, DOE, EEI, ISO and State regulatory personnel, experts in DSM and energy markets participants (22% more than the first meeting) met in person and by conference telephone at NAESB headquarters in Houston to refine the scope of Phase 1 activities, agreeing on a specific list of tasks and assigning subgroups of volunteers to work on each task. At this meeting, no less than 28 individuals spoke to the group.
- **June 18, 2007:**. 51 NAESB members, FERC, DOE, EEI, ISO and State regulatory personnel, experts in DSM and energy markets participants met in person and by conference telephone at BGE offices in Baltimore to further refine the scope of Phase 1 activities by reviewing the initial task list and revising it with more detailed deliverable requirements and dates, and with identification of base documents to support completing each task.
- **July 26, 2007:** 46 NAESB members, FERC, DOE, EEI, ISO and State regulatory personnel, experts in DSM and energy markets participants met in person and by conference telephone at AGA offices in Washington DC to present deliverables of existing demand response measurement and verification protocols and a list of 41 possible topics and subtopics for NAESB model business practices. The task force reviewed all 41 possibilities, deciding whether to draft MBPs and which ones can be grouped together.
- **September 14, 2007:** The results of the meeting including possible standards text were sent out for comment including notes, considerations and possible standards text. Comments were requested on each of the nine standards development areas including whether the remarks were directed to wholesale or retail markets, pre program evaluation or post implementation evaluation, or to DSM or EE projects.
- **September 25, 2007:** A DSM-EE meeting was held in Austin, Texas hosted by ERCOT. The purpose of the meeting was to review the comments, determine the level of progress made towards the task list and determine is adjustments to the task, focus or schedule were needed. When reviewing the comments it was determined to focus in five areas specific to demand response programs, and develop business practice standards that would prove helpful – (1) DR programs administered by ISOs and RTOS in the wholesale markets, (2) DR programs administered by utilities in wholesale markets, (3) DR programs administered by utilities in the retail markets, (4) a glossary to support the DR programs, and (5) a preamble to put the business practice standards in context. To focus on the DR programs, each of the three areas outlined will develop a matrix that describes the aspects of the DR programs in effect today, planned, or has been in effect in the past.
- **November 6, 2007:** Several of the NAESB leadership met with Commissioners Kerr and Ervin of NC to gain further understanding of expectations for DSM-EE NAESB activity for electricity for the retail markets.
- **November 11, 2007**: NAESB participated in a panel on DSM-EE at the NARUC Annual Meeting in Anaheim.
- **November 30, 2007:** Meeting hosted by Dominion in Richmond. During the meeting, each of the five groups described the progress made and plans to date. Drafts of the three matrices were reviewed, as was a draft glossary

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NAESB DSM-EE ACTIVITY SUMMARY
MAY 30, 2008

and outline for the preamble. It is possible that the two wholesale matrices will be combined, as The calendar for 2008 was also set. The next meeting is scheduled for January 23 in Baltimore hosted by BGE.

- **December 3, 2007:** A meeting was held with Commissioner Mason of Ohio to gain further understanding of expectations for DSM-EE NAESB activity for natural gas for the retail markets.
- **January 23, 2008:** The group met in Baltimore to review progress on the two matrices, the preamble and the glossary. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. Data is being placed in five separate categories -Initial Testing and Auditing, Ongoing Testing and Auditing, Triggering; Construction, Statistical Analysis, Performance and Baselines. The matrix for retail DR programs is lagging but several companies have provided or agreed to provide data – including BGE, Dominion, ConEd, Alabama Power and ComVerge. Procedures for how to collect the data was discussed with both interviews online and distributed surveys discussed. Both the preamble and glossary while first drafts are available are dependent on the work of the matrices and cannot be further developed until after more progress has been made on the matrices.
- **March 28, 2008:** The group met in Houston to review progress on the two matrices. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. The matrix had expanded significantly to provide for more comparability for responses. 45 DR programs have been identified and the data is now being verified. A template for the type of standards to be expected from this effort was reviewed. The retail matrix now has additional data and several interviews were conducted online, with the conclusion that it is the preferred way to gather data. The retail group is to set up a face-to-face meeting in May to review the matrix and make changes before sending it out to utilities for interviews.
- **May 30, 2008** – The group met in Holyoke to continue review progress on the two matrices. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. The matrix had expanded significantly to provide for more comparability for responses. With the 45 DR programs identified, the group is now consolidating the data to higher levels from the more specific items collected. With the consolidation, the business practices should be drafted. The outline for the business practices has been prepared. The retail matrix now has contributions from 11 DR programs and the matrix structure is being validated against flow charts of the programs. Once the matrix structure is validated, online interviews will be held. It was determined to concentrate on dispatchable DR programs first.
- **Planned, July 30, 2008** – Planned meeting hosted by ACES Power in Indianapolis
- **Planned, September 30, 2008** – Planned meeting hosted by ERCOT in Austin
- **Planned, December 2, 2008** – Planned meeting hosted by NAESB office in Houston

THE FOLLOWING INCLUDES:

- WHOLESALE WORK PLAN AND MATRIX 2

LINKS ON THE NAESB WEB SITE:

- DSM-EE NAESB PAGE FOR MEETINGS AND MATERIALS: http://www.naesb.org/dsm-ee.asp
- RELEVANT DOCUMENTS AND WORK PAPERS: http://www.naesb.org/dsm-ee_doc.asp

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WHOLESALE PLAN

ISO/RTO Wholesale Matrix Plan					
#	**Task**	**Description**	**Deliverable**	**Completion Date**	**Who**
1	Finalize Framework	The draft framework will serve as a basis for documenting the technical M&V requirements for the different ISO/RTO products. It should guide each ISO-RTO in answering the questions of Why, When, and What M&V is done.	Each ISO should provide comments on the Objectives, Frequency and Description. Each ISO/RTO should add any additional comments that it feels it needs to describe the products, (this will help to synthesize any commonalities between products and ISO/RTOs). If the list of product classes are not representative, please comment.	10/30/07 COMPLETE	All
2	ISO/RTO Conference Call	This call is designed to discuss comments submitted in regard to the Framework	Come to consensus on the Framework	Week of November 19 , 2007 COMPLETE	All
3	Report to NAESB DSM/EE Standards Committee	At the September 25th meeting the ISO/RTOs tacitly agreed to report back to the Committee on how we plan on completing the task by the end of the 1st quarter of 2008.	Report to NAESB DSM-EE Task Force the status of the ISO/RTO Wholesale standards development.	11/30/07 COMPLETE	P. Wattles, E. Winkler
4	Add M&V technical data	Each ISO/RTO will fill in the matrix with appropriate technical requirements and how the M&V activity is implemented (where appropriate) for each of its products and each M&V area.	A Draft Matrix with the general description of the M&V areas, products and technical information in M&V requirements for each ISO/RTOs range of products.	12/15/07 COMPLETE	All
5	ISO/RTO Conference Call	This call is designed to review progress on data synthesis from the Framework	Develop status update on development of wholesale standards	January 14, 2008. COMPLETE	All
6	Report to NAESB DSM/EE Task Force	Status report of Wholesale standards	Report to NAESB the status of the ISO/RTO Wholesale standards development.	1/23/2008 COMPLETE	P. Wattles, E. Winkler
7	Update M&V Technical Data	ISO/RTOs will update matrices with appropriate expanded technical requirements.	Expanded draft Matrix	1/30/2008 COMPLETE	All
8	ISO/RTO Conference Call	This call is designed to review progress on data synthesis from the Framework	Develop status update on development of wholesale standards	2/11/08 COMPLETE	All
9	Draft Wholesale Standards	Synthesize Technical Requirements into draft Standards	Draft Standards will be developed by processing the technical requirements provided by all the ISO/RTOs to find commonalities and or create ranges of requirements	2/29/08 COMPLETE internal document	E. Winkler lead, Scott COE, review by All

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WHOLESALE PLAN

ISO/RTO Wholesale Matrix Plan					
#	**Task**	**Description**	**Deliverable**	**Completion Date**	**Who**
10	ISO/RTO Working Meeting	This meeting is designed to review and discuss the draft wholesale standards.	Provide agreement on draft standards to be submitted to NAESB	3/11/08 - 3/12/08 COMPLETE	All
11	Revise Draft Outline of Standards	Revised Draft Wholesale DR Standards outline based on working group session distributed to ISO/RTO working group	Revised Draft Wholesale Standards Outline	3/18/08 COMPLETE	E. Winkler
12	Update M&V Technical Data	Each ISO/RTO will revise entries in the matrix for appropriate technical requirements per the current draft matrix. (IRC Demand Programs 2008-03-14.xls)	A Draft Matrix with the general description of the M&V areas, products and technical information in M&V requirements for each ISO/RTOs range of products and services	3/21/08	All
13	Call to review Presentation & discuss presentation at DSM/EE Meeting	Review of materials and scope of presentation at NAESB DSM/EE standards development meeting, Houston, TX March 28, 2008	Presentation materials for meeting	3/26/08	P. Wattles, E. Winkler
14	NAESB DSM/EE Standards Committee	ISO-RTO documents presented as a draft for wider NAESB stakeholder consideration and comment	Report to NAESB on documented ISO/RTO Wholesale DR M&V standards for use in developing proposed NAESB standards and/or model business practices.	3/28/08 Houston TX	P. Wattles, E. Winkler, S. Coe
15	ISO/RTO Working Meeting	This meeting is designed to review and discuss the draft wholesale standards.	Provide agreement on draft standards to be submitted to NAESB	Mid May, 2008, TBD	All
16	NAESB DSM/EE Standards Committee	ISO-RTO documents presented as a draft for wider NAESB stakeholder consideration and comment	Report to NAESB on documented ISO/RTO Wholesale DR M&V standards for use in developing proposed NAESB standards and/or model business practices.	5/30/08 Holyoke, MA	P. Wattles, E. Winkler, S. Coe
17	NAESB DSM/EE Standards Committee	ISO-RTO documents presented as a draft for wider NAESB stakeholder consideration and comment	Report to NAESB on documented ISO/RTO Wholesale DR M&V standards for use in developing proposed NAESB standards and/or model business practices.	7/30/08 TBD	P. Wattles, E. Winkler, S. Coe
18	ISO/RTO Working Meeting	This meeting is designed to review and discuss the draft wholesale standards.	Provide agreement on draft standards to be submitted to NAESB	Mid Sept, 2008, TBD	All

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WHOLESALE PLAN

ISO/RTO Wholesale Matrix Plan					
#	**Task**	**Description**	**Deliverable**	**Completion Date**	**Who**
19	Draft Wholesale DR Standards	Final Draft Wholesale Standards Completed for submittal to NAESB	Completed draft ISO/RTO contribution of wholesale DR M&V standards	9/30/08	E. Winkler, S. Coe
20	NAESB DSM/EE Standards Committee	ISO-RTO documents presented as a draft for wider NAESB stakeholder consideration and comment	Report to NAESB on documented ISO/RTO Wholesale DR M&V standards for use in developing proposed NAESB standards and/or model business practices.	9/30/08 Austin, TX	P. Wattles, E. Winkler, S. Coe

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WHOLESALE MATRIX

Instructions for Characteristics of DR Programs

ISO/RTO Specific Name	**Region**	Abbreviation for the ISO/RTO.
	ISO/RTO Program or Service Name	Proper name for the program or service within the region. Note: If several products are included in a given Program or Service, then several rows will be shown for each.
	Acronym	Acronym for the Program or Service
Major Features	**Product**	The commodity that is being offered: **AS: Regulation**, **AS: Spin**, **AS: Non-Spin**, **Energy**, or **Capacity**.
	Mapping: NAESB Sections	**CALCULATED FIELD: DO NOT TYPE IN THIS CELL**
Initial Qualification / Testing / Auditing	**Load Deployment Time**	Time at which the requested level of response is completely "off the system" (in minutes)
	Aggregation Allowed	Indication of if composite / aggregated assets are allowed.
Telemetry	**Real-Time On-Site Generation Measurement**	If on-site generation is present; is metering required? **Yes** / **No**
	Accuracy	Precision of the Demand Measurement (or also of the On-Site Generator Output) ***PREFERENCE IS PERCENTAGE OF FULL SCALE***
	Reporting Interval	The time between signals [in seconds]
	Other Measurements	If other variables are measured, a list should be provided here. Example include quality flags, breaker status, response amount, etc .
	Communication Protocol	The IT protocol used to collect the data, such **ICCP** or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.
After-The-Fact Measurements	**On-Site Generation Meter Required**	Yes or No
	Meter Accuracy	Accuracy of the Meter Reading (or also of the On-Site Generator Output) PREFERENCE IS PERCENTAGE OF FULL SCALE and is the net accuracy, i.e. includes PT & CT

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WHOLESALE MATRIX

Instructions for Characteristics of DR Programs

	Clock / Time Accuracy	Accuracy of the time measurement (if any) associated with the Meter Read time.
	Details of Meter/Equipment Standards	Listing of any meter or equipment standards
	Meter Data Reporting Deadline	How often is the meter reading data sent to the ISO/RTO related to demand response reporting. May be absolute or relative to Event period. Also, those entries marked "Daily" or "Monthly" happens regardless of the existence of an Event.
	Granularity	The level of detail in the reported data. For example, if the Periodicity = 1 hour, the Granularity might be 5 minute.
	Validating, Editing & Estimating (VEE) Method	An indication of how missing data are managed, for example, **Skipped**, **Estimated & Flagged**, etc.
	Rules For Statistical Sampling	If statistical sampling is allowed, document the sample size, precision and accuracy parameters, homogeneity, etc.
Performance / Baseline	**Baseline Type**	Either "**Meter-Before vs. Meter-After**", "**Comparable Day**", "**Statistical Algorithm**" , "**Behind the Meter Generation Data**", "**Firm Service Level Drop**"

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
AESO	Demand Opportunity Service	DOS		
AESO	Frequency Load Shed Service	FLSS	AS: Regulation	Regulation
AESO	Supplemental Operating Reserves	SUP	AS: Non-Spin	Reserve
AESO	Voluntary Load Curtailment Program	VLCP		
CAISO	Participating Load Program	PLP	Energy	Energy
CAISO	Participating Load Program	PLP	AS: Non-Spin	Reserve
ERCOT	Emergency Interruptible Load Service	EILS	Capacity	Capacity

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
ERCOT	Loads Acting as a Resource providing Responsive Reserve Service -- Under Frequency Relay Type	LaaR / RRS / UFR	AS: Spin	Reserve
ERCOT	Loads Acting as a Resource providing Responsive Reserve Service -- Controllable Load Resource Type	LaaR / RRS / CLR	AS: Spin	Reserve
ERCOT	Loads Acting as a Resource providing Non-Spinning Reserve Service	LaaR / NSRS /	AS: Non-Spin	Reserve
ERCOT	Controllable Load Resources providing Regulation Service	CLR	AS: Regulation	Regulation
IESO	Emergency Load Reduction Program	ELRP	Energy	Energy
IESO	Emergency Demand Response Program	EDRP	Energy	Energy
IESO	Dispatchable Load	DL	Energy	Energy

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
IESO	Dispatchable Load (Spinning Component)	DL	AS: Spin	Reserve
IESO	Dispatchable Load (Non-Spinning Component)	DL	AS: Non-Spin	Reserve
IESO	Hour Ahead Dispatchable Load	HADL	Energy	Energy
ISO-NE	Real Time Demand Response Program [Capacity Component]	RTDRP	Capacity	Capacity
ISO-NE	Real Time Demand Response Program [Energy Component]	RTDRP	Energy	Energy
ISO-NE	Day Ahead Load Response Program	DALRP	Energy	Energy
ISO-NE	Demand Response Reserves Pilot	DRR	AS: Non-Spin	Reserve

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
ISO-NE	Real Time Price Response Program	RTPR	Energy	Energy
ISO-NE	Real Time Demand Response Resource	RTDR	Capacity	Capacity
ISO-NE	FCM: On-Peak, Seasonal Peak, Critical Peak Resources		Capacity	Capacity
ISO-NE	Real Time Emergency Generation Resource	RTEG	Capacity	Capacity
NBSO	30 Minute Non-Spinning Reserves	30NSR	AS: Non-Spin	Reserve
NBSO	10 Minute Non-Spinning Reserves	10NSR	AS: Non-Spin	Reserve
NBSO	10 Minute Spinning Reserve	10SR	AS: Spin	Reserve

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Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
NBSO	Load Following	LF	AS: Regulation	Regulation
NBSO	Regulation	REG	AS: Regulation	Regulation
NBSO	Interruptible Load	IL	Capacity	Capacity
NBSO	Bid-Based Demand Response	BBDR	Energy	Energy
NYISO	Day-Ahead Demand Response Program	DADRP	Energy	Energy
NYISO	Demand Side Ancillary Services Program	DSASP	AS: Spin	Reserve
NYISO	Demand Side Ancillary Services Program	DSASP	AS: Non-Spin	Reserve

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
NYISO	Demand Side Ancillary Services Program	DSASP	AS: Regulation	Regulation
NYISO	Emergency Demand Response Program	EDRP	Energy	Energy
NYISO	Installed Capacity Special Case Resources (Energy Component)	SCR	Energy	Energy
NYISO	Installed Capacity Special Case Resources (Capacity Compoent)	SCR	Capacity	Capacity
PJM	Economic Load Response		Energy	Energy
PJM	Economic Load Response		AS: Spin	Reserve
PJM	Economic Load Response		AS: Regulation	Regulation

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
PJM	Emergency Load Response		Energy	Energy
PJM	Emergency Load Response (Energy Component)		Energy	Energy
PJM	Emergency Load Response (Capacity Component)		Capacity	Capacity

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WHOLESALE MATRIX DRAFT PROPOSED STANDARDS OUTLINE

DISCLAIMER

THIS DOCUMENT CONTAINS DRAFT INFORMATION ON STANDARDS FOR WHOLESALE ELECTRICITY DEMAND RESPONSE PROGRAMS AND SERVICES. THE INFORMATION CONTAINED WITHIN THIS DRAFT IS NOT INTENDED TO REPLACE APPLICABLE TARIFFS FOR WHOLESALE DEMAND RESPONSE. IN NO CASE DOES THIS INFORMATION SUPPLANT EXISTING STANDARDS USED IN ISO/RTO ADMINISTERED MARKETS. PROPOSED STANDARDS AREAS ARE DRAFT AND SUBJECT TO REVISION OR EXCLUSION.

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WHOLESALE MATRIX DRAFT PROPOSED STANDARDS OUTLINE

BUSINESS PRACTICES FOR WHOLESALE ELECTRICITY DEMAND RESPONSE

Introduction

Definition of Terms

Business Practice Requirements: Regulation Services

PROVISIONS OF MEASUREMENT AND VERIFICATION STANDARDS

Applicability

Purpose

WHOLESALE MARKET DEMAND RESPONSE PRODUCTS

Wholesale Products:
The commodity that is being offered: Regulation, Reserve, Energy, or Capacity.

INITIAL QUALIFICATION / TESTING / AUDITING

Reduction Deadline Standard:
Time at which the requested level of response is completely "off the system" (in minutes)

Aggregation Allowed Standard:
Indication of if composite / aggregate assets are allowed.

TELEMETRY

Real-Time Demand Measurement Required:
Measurement of the real-time demand for each Resource required: Yes / No.

Real-Time On-Site Generation Measurement:
If on-site generation is present; is metering required? Yes / No.

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Accuracy:

Precision of the Demand Measurement (or also of the On-Site Generator Output)

Reporting Interval:

The time between signals [in seconds]

Other Measurements:

If other variables are measured, a list should be provided here. Example include: quality flags, breaker status, response amount, etc.

Communication Protocol:

The IT protocol used to collect the data, such ICCP or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.

AFTER-THE-FACT MEASUREMENTS

On-Site Generation Meter Required:

Yes or No

Meter Accuracy:

Accuracy of the Meter Reading (or also of the On-Site Generator Output) and is the net accuracy, i.e. includes PT & CT

Clock / Time Accuracy:

Accuracy of the time measurement (if any) associated with the Meter Read time.

Details of Meter/Equipment Standards

Listing of any meter or equipment standards

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Meter Data Reporting Deadline:

How often is the meter reading data sent to the ISO/RTO related to demand response reporting. May be absolute or relative to Event period. Also, those entries marked "Daily" or "Monthly" happens regardless of the existence of an Event.

Granularity:

The level of detail in the reported data. For example, if the Meter Data Reporting Deadline = “within 24 hours”, the Granularity might be “1 hour”.

Validating, Editing & Estimating (VEE) Method:

An indication of how missing data are managed, for example, Skipped, Estimated & Flagged, etc.

Rules for Statistical Sampling:

If statistical sampling is allowed, a brief summary of the rules associated with the estimates, for example, minimum percentage of physical measurements.

PERFORMANCE / BASELINE

Baseline Types:

Either "Meter-Before vs. Meter-After", "Comparable Day", "Statistical Algorithm" , "Behind the Meter Generation Data", "Firm Service Level Drop"

Business Practice Requirements: Reserves Services

PROVISIONS OF MEASUREMENT AND VERIFICATION STANDARDS

Applicability

Purpose

WHOLESALE MARKET DEMAND RESPONSE PRODUCTS

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Wholesale Products:

The commodity that is being offered: Regulation, Reserve, Energy, or Capacity.

INITIAL QUALIFICATION / TESTING / AUDITING

Reduction Deadline Standard:

Time at which the requested level of response is completely "off the system" (in minutes)

Aggregation Allowed Standard:

Indication of if composite / aggregate assets are allowed.

TELEMETRY

Real-Time Demand Measurement Required:

Measurement of the real-time demand for each Resource required: Yes / No.

Real-Time On-Site Generation Measurement:

If on-site generation is present; is metering required? Yes / No.

Accuracy:

Precision of the Demand Measurement (or also of the On-Site Generator Output)

Reporting Interval:

The time between signals [in seconds]

Other Measurements:

If other variables are measured, a list should be provided here. Example include: quality flags, breaker status, response amount, etc.

Communication Protocol:

The IT protocol used to collect the data, such ICCP or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.

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WHOLESALE MATRIX DRAFT PROPOSED STANDARDS OUTLINE

AFTER-THE-FACT MEASUREMENTS

On-Site Generation Meter Required:

Yes or No

Meter Accuracy:

Accuracy of the Meter Reading (or also of the On-Site Generator Output) and is the net accuracy, i.e. includes PT & CT

Clock / Time Accuracy:

Accuracy of the time measurement (if any) associated with the Meter Read time.

Details of Meter/Equipment Standards

Listing of any meter or equipment standards

Meter Data Reporting Deadline:

How often is the meter reading data sent to the ISO/RTO related to demand response reporting. May be absolute or relative to Event period. Also, those entries marked "Daily" or "Monthly" happens regardless of the existence of an Event.

Granularity:

The level of detail in the reported data. For example, if the Meter Data Reporting Deadline = “within 24 hours”, the Granularity might be “1 hour”.

Validating, Editing & Estimating (VEE) Method:

An indication of how missing data are managed, for example, Skipped, Estimated & Flagged, etc.

Rules for Statistical Sampling:

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If statistical sampling is allowed, a brief summary of the rules associated with the estimates, for example, minimum percentage of physical measurements.

PERFORMANCE / BASELINE

Baseline Types:

Either "Meter-Before vs. Meter-After", "Comparable Day", "Statistical Algorithm" , "Behind the Meter Generation Data", "Firm Service Level Drop"

Business Practice Requirements: Energy Products

PROVISIONS OF MEASUREMENT AND VERIFICATION STANDARDS

Applicability

Purpose

WHOLESALE MARKET DEMAND RESPONSE PRODUCTS

Wholesale Products:
The commodity that is being offered: Regulation, Reserve, Energy, or Capacity.

INITIAL QUALIFICATION / TESTING / AUDITING

Reduction Deadline Standard:
Time at which the requested level of response is completely "off the system" (in minutes)

Aggregation Allowed Standard:
Indication of if composite / aggregate assets are allowed.

TELEMETRY

Real-Time Demand Measurement Required:
Measurement of the real-time demand for each Resource required: Yes / No.

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Real-Time On-Site Generation Measurement:
If on-site generation is present; is metering required? Yes / No.

Accuracy:

Precision of the Demand Measurement (or also of the On-Site Generator Output)

Reporting Interval:

The time between signals [in seconds]

Other Measurements:

If other variables are measured, a list should be provided here. Example include: quality flags, breaker status, response amount, etc.

Communication Protocol:

The IT protocol used to collect the data, such ICCP or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.

AFTER-THE-FACT MEASUREMENTS

On-Site Generation Meter Required:

Yes or No

Meter Accuracy:

Accuracy of the Meter Reading (or also of the On-Site Generator Output) and is the net accuracy, i.e. includes PT & CT

Clock / Time Accuracy:

Accuracy of the time measurement (if any) associated with the Meter Read time.

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Details of Meter/Equipment Standards

Listing of any meter or equipment standards

Meter Data Reporting Deadline:

How often is the meter reading data sent to the ISO/RTO related to demand response reporting. May be absolute or relative to Event period. Also, those entries marked "Daily" or "Monthly" happens regardless of the existence of an Event.

Granularity:

The level of detail in the reported data. For example, if the Meter Data Reporting Deadline = “within 24 hours”, the Granularity might be “1 hour”.

Validating, Editing & Estimating (VEE) Method:

An indication of how missing data are managed, for example, Skipped, Estimated & Flagged, etc.

Rules for Statistical Sampling:

If statistical sampling is allowed, a brief summary of the rules associated with the estimates, for example, minimum percentage of physical measurements.

PERFORMANCE / BASELINE

Baseline Types:

Either "Meter-Before vs. Meter-After", "Comparable Day", "Statistical Algorithm" , "Behind the Meter Generation Data", "Firm Service Level Drop"

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WHOLESALE MATRIX DRAFT PROPOSED STANDARDS OUTLINE

Business Practice Requirements: Capacity Products

PROVISIONS OF MEASUREMENT AND VERIFICATION STANDARDS

Applicability

Purpose

WHOLESALE MARKET DEMAND RESPONSE PRODUCTS

Wholesale Products:
The commodity that is being offered: Regulation, Reserve, Energy, or Capacity.

INITIAL QUALIFICATION / TESTING / AUDITING

Reduction Deadline Standard:
Time at which the requested level of response is completely "off the system" (in minutes)

Aggregation Allowed Standard:
Indication of if composite / aggregate assets are allowed.

TELEMETRY

Real-Time Demand Measurement Required:
Measurement of the real-time demand for each Resource required: Yes / No.

Real-Time On-Site Generation Measurement:
If on-site generation is present; is metering required? Yes / No.

Accuracy:

Precision of the Demand Measurement (or also of the On-Site Generator Output)

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Reporting Interval:

The time between signals [in seconds]

Other Measurements:

If other variables are measured, a list should be provided here. Example include: quality flags, breaker status, response amount, etc.

Communication Protocol:

The IT protocol used to collect the data, such ICCP or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.

AFTER-THE-FACT MEASUREMENTS

On-Site Generation Meter Required:

Yes or No

Meter Accuracy:

Accuracy of the Meter Reading (or also of the On-Site Generator Output) and is the net accuracy, i.e. includes PT & CT

Clock / Time Accuracy:

Accuracy of the time measurement (if any) associated with the Meter Read time.

Details of Meter/Equipment Standards

Listing of any meter or equipment standards

Meter Data Reporting Deadline:

How often is the meter reading data sent to the ISO/RTO related to demand response reporting. May be absolute or relative to Event period. Also, those entries marked "Daily" or "Monthly" happens regardless of the existence of an Event.

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Granularity:

The level of detail in the reported data. For example, if the Meter Data Reporting Deadline = “within 24 hours”, the Granularity might be “1 hour”.

Validating, Editing & Estimating (VEE) Method:

An indication of how missing data are managed, for example, Skipped, Estimated & Flagged, etc.

Rules for Statistical Sampling:

If statistical sampling is allowed, a brief summary of the rules associated with the estimates, for example, minimum percentage of physical measurements.

PERFORMANCE / BASELINE

Baseline Types:

Either "Meter-Before vs. Meter-After", "Comparable Day", "Statistical Algorithm" , "Behind the Meter Generation Data", "Firm Service Level Drop"

North American Energy Standards Board

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NAESB DSM-EE ACTIVITY SUMMARY
MAY 30, 2008

DSM-EE PROJECT – ASSIGNED TO RETAIL GAS, RETAIL ELECTRIC AND WHOLESALE ELECTRIC:

- **April 11, 2007:** Several representatives of the NAESB WEQ, REQ, and RGQ as well as representatives of the US Department of Energy, US Environmental Protection Agency, FERC, and other industry experts met at the Department of Energy offices in Washington, D.C. to discuss the NAESB effort to draft business practices for Demand Side Management and Energy Efficiency. Ongoing Energy Efficiency and DSM projects and programs by other groups (such as NAPEE) were reviewed by the meeting attendees. The following resolution outlines the scope of the initial effort by NAESB to draft business practice standards for these topics: It was decided that NAESB should begin its standards development focus on measurement and verification of energy savings and peak demand reduction from both a wholesale and retail electric market perspective. A future schedule of meetings for DSM and Energy Efficiency should be posted on the NAESB website shortly.
- **May 24, 2007:** 75 NAESB members, FERC, DOE, EEI, ISO and State regulatory personnel, experts in DSM and energy markets participants (22% more than the first meeting) met in person and by conference telephone at NAESB headquarters in Houston to refine the scope of Phase 1 activities, agreeing on a specific list of tasks and assigning subgroups of volunteers to work on each task. At this meeting, no less than 28 individuals spoke to the group.
- **June 18, 2007:**. 51 NAESB members, FERC, DOE, EEI, ISO and State regulatory personnel, experts in DSM and energy markets participants met in person and by conference telephone at BGE offices in Baltimore to further refine the scope of Phase 1 activities by reviewing the initial task list and revising it with more detailed deliverable requirements and dates, and with identification of base documents to support completing each task.
- **July 26, 2007:** 46 NAESB members, FERC, DOE, EEI, ISO and State regulatory personnel, experts in DSM and energy markets participants met in person and by conference telephone at AGA offices in Washington DC to present deliverables of existing demand response measurement and verification protocols and a list of 41 possible topics and subtopics for NAESB model business practices. The task force reviewed all 41 possibilities, deciding whether to draft MBPs and which ones can be grouped together.
- **September 14, 2007:** The results of the meeting including possible standards text were sent out for comment including notes, considerations and possible standards text. Comments were requested on each of the nine standards development areas including whether the remarks were directed to wholesale or retail markets, pre program evaluation or post implementation evaluation, or to DSM or EE projects.
- **September 25, 2007:** A DSM-EE meeting was held in Austin, Texas hosted by ERCOT. The purpose of the meeting was to review the comments, determine the level of progress made towards the task list and determine is adjustments to the task, focus or schedule were needed. When reviewing the comments it was determined to focus in five areas specific to demand response programs, and develop business practice standards that would prove helpful – (1) DR programs administered by ISOs and RTOS in the wholesale markets, (2) DR programs administered by utilities in wholesale markets, (3) DR programs administered by utilities in the retail markets, (4) a glossary to support the DR programs, and (5) a preamble to put the business practice standards in context. To focus on the DR programs, each of the three areas outlined will develop a matrix that describes the aspects of the DR programs in effect today, planned, or has been in effect in the past.
- **November 6, 2007:** Several of the NAESB leadership met with Commissioners Kerr and Ervin of NC to gain further understanding of expectations for DSM-EE NAESB activity for electricity for the retail markets.
- **November 11, 2007**: NAESB participated in a panel on DSM-EE at the NARUC Annual Meeting in Anaheim.
- **November 30, 2007:** Meeting hosted by Dominion in Richmond. During the meeting, each of the five groups described the progress made and plans to date. Drafts of the three matrices were reviewed, as was a draft glossary and outline for the preamble. It is possible that the two wholesale matrices will be combined, as The calendar for 2008 was also set. The next meeting is scheduled for January 23 in Baltimore hosted by BGE.

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NAESB DSM-EE ACTIVITY SUMMARY
MAY 30, 2008

- **December 3, 2007:** A meeting was held with Commissioner Mason of Ohio to gain further understanding of expectations for DSM-EE NAESB activity for natural gas for the retail markets.
- **January 23, 2008:** The group met in Baltimore to review progress on the two matrices, the preamble and the glossary. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. Data is being placed in five separate categories -Initial Testing and Auditing, Ongoing Testing and Auditing, Triggering; Construction, Statistical Analysis, Performance and Baselines. The matrix for retail DR programs is lagging but several companies have provided or agreed to provide data – including BGE, Dominion, ConEd, Alabama Power and ComVerge. Procedures for how to collect the data was discussed with both interviews online and distributed surveys discussed. Both the preamble and glossary while first drafts are available are dependent on the work of the matrices and cannot be further developed until after more progress has been made on the matrices.
- **March 28, 2008:** The group met in Houston to review progress on the two matrices. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. The matrix had expanded significantly to provide for more comparability for responses. 45 DR programs have been identified and the data is now being verified. A template for the type of standards to be expected from this effort was reviewed. The retail matrix now has additional data and several interviews were conducted online, with the conclusion that it is the preferred way to gather data. The retail group is to set up a face-to-face meeting in May to review the matrix and make changes before sending it out to utilities for interviews.
- **May 30, 2008** – Pl The group met in Holyoke to continue review progress on the two matrices. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. The matrix had expanded significantly to provide for more comparability for responses. With the 45 DR programs identified, the group is now consolidating the data to higher levels from the more specific items collected. With the consolidation, the business practices should be drafted. The outline for the business practices has been prepared. The retail matrix now has contributions from 11 DR programs and the matrix structure is being validated against flow charts of the programs. Once the matrix structure is validated, online interviews will be held. It was determined to concentrate on dispatchable DR programs first.
- **Planned, July 30, 2008** – Planned meeting hosted by ACES Power in Indianapolis
- **Planned, September 30, 2008** – Planned meeting hosted by ERCOT in Austin
- **Planned, December 2, 2008** – Planned meeting hosted by NAESB office in Houston

THE FOLLOWING INCLUDES:

- RETAIL WORK PLAN 3
- RETAIL MATRIX HEADERS 7
- RETAIL MATRIX 10

LINKS ON THE NAESB WEB SITE:

- DSM-EE NAESB PAGE FOR MEETINGS AND MATERIALS: http://www.naesb.org/dsm-ee.asp
- RELEVANT DOCUMENTS AND WORK PAPERS: http://www.naesb.org/dsm-ee_doc.asp

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RETAIL PLAN

Retail Matrix Work Plan for NAESB EE/DSM Standards

Task/Description/Steps	Status
1 FINALIZE THE RETAIL MATRIX SPREADSHEET	
The retail matrix spreadsheet will provide the basis for a utility survey to determine what types of M&V are currently underway for current or past DR programs and what is planned for new programs.	
• Decide if spreadsheet needs to be reformatted. *Assigned to Rae McQuade, presented at the January DSM-EE meeting.*	Completed – 1-17-08
• Add additional columns – past programs, current programs, proposed programs *Assigned to Rae McQuade, presented at the January DSM-EE meeting.*	Completed – 1-17-08
• Add examples from BGE and Alabama Power *Examples provided by BGE (Ruth Kiselewich) and Alabama Power (Neal Allen).*	Completed – 1-17-08
• Add examples from ConEd and Puget Sound Energy *Examples were provided by Puget Sound Energy (Bob Harshbarger) but a follow up call is needed to ensure correct entry to the matrix. ConEd has been contacted. Rip Newcomb and Rae McQuade to contact ConEd and PSE, complete via conference call, and web cast.*	Completed – 3-18-08, ConEd review of matrix entries is not complete.
• Determine if other examples should be added. *Add additional examples from Dominion and reach out to ComVerge. Alabama Power review of its entries in light of the others added. ComVerge has been contacted and may provide data.*	March 31, 2008
• Review the examples to determine if matrix should be revised to provide the analysis needed in later steps. Review for lessons learned with the ISO-RTO Council in its matrix development and reflect such modifications in the retail matrix. Modify instructions based on interviews.	After March 28, 2008
2 PREPARE SURVEY	
The survey will be used to solicit other utility responses for DR programs that they have administered, currently administer or plan to administer. The data will be entered into the retail matrix spreadsheet.	
• Provide cover letter draft for review.	Outline prepared for review pre-March 28.
• Describe the purpose of survey, what is expected and how to respond. Prepare a white paper as part of the cover letter that would outline expectations.	Outline prepared for review pre-March 28.
• The cover letter introducing the survey should allow for two methods of data collection: (1) Phone survey with matrix filled in during conference call/web cast wit the submitter including work papers forwarded prior to the call, or (2)	

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Retail Matrix Work Plan for NAESB EE/DSM Standards

Task/Description/Steps	Status
submitter providing responses directly into the matrix, which may then require a follow up call should additional information be required for the responses.	
• Consider preparation of tutorial (access instructions work sheet from the retail matrix and elaborate to prepare a tutorial) – this may not be required if the instructions are sufficient and we address data collection primarily via the web cast interview process.	Set up a task force call for this after calls with PSE and ConEd. and cover letter has been drafted
3 CONDUCT SURVEY	
The survey instrument will request each participant to submit his or her responses. Responses will be reviewed and segregated into types of programs. A summary report will be produced which describe the quality of the responses and the general types of programs that were submitted. This will be a qualitative assessment to determine the next steps of evaluation and the level of effort required.	
• Identify target audience of utilities.	
• Forward survey and contact utility to determine method of completion of survey for matrix entry.	
• Assemble responses in matrix and review for consistency.	
• Identify follow up contacts as a result of review.	
4 COLLECT AND SUMMARIZE SURVEY RESULTS	
• Identify similarities within programs, related to M&V that may support development of business practices.	
• Identify regional aspects that should be preserved.	
• Determine if business practices have target area for applicability.	
5 REPORT TO NAESB	
Report out on preliminary assessment of the responses with a proposed work plan to complete the analysis and recommend next steps.	
• Draft report	

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Retail Matrix Work Plan for NAESB EE/DSM Standards

Task/Description/Steps	Status

- Review draft report with contributors and edit as needed
- Prepare presentation of results for DSM-EE subcommittee

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RETAIL MATRIX

How to use this Matrix:

To the best of your ability fill in the matrix with tje descriptions for the columns as noted below. If there are multiple programs or product names or triggers within a Class of DR Resource, please include their names and the trigger actions as appropriate . If there are different M&V requirements within a Class of DR Resource include them separated by a notation as to which product name it applies. There is no limit to the amount of information you add for each box, (this should occur rarely). Please note that the description text provided for specific programs is used as examples to put the issue identified in the heading within context. Companies may have different or similar descriptions for programs. There may or may not have differences in program qualification versus program implementation.

This Section in below in Blue is meant to clarify and focus the M&V content to be filled in the matrix following

Column Header	Objective	Frequency	Description
Qualification/ testing/ auditing	To ensure that the DR resources are capable of performing, thereby delivering the product(s) being purchased.	Prior to participation in market, and ongoing.	Up front process to verify adequate infrastructure (measurement & data recording and communication equipment and data validation procedures) in place. May include on-site inspections, data transfers, actual load reduction test to verify that the resource is able to deliver the committed reductions. Process & procedures for disqualification. THe data entered should answer the question: "How do you verify that the equipment is operating as expected?"
Data reporting- frequency and monitoring	To ensure adequate information to measure DR performance, accurate settlement and real-time operating data as appropriate.	Ongoing and/or event-driven.	Requirements around transmittal of meter and/or telemetry data to market. Includes validation, editing & estimation (VEE). *If reporting for a particular product is differentiated by what it is used for, e.g. operations, planning or settlement only. For VEE - addressing missing values, high-low checks, etc.*.Utility best practices should be followed in addressing missing data or questionable data with techniques used to estimate or edit data. Retail business practices may be developed to define parameters supporting addressing estimates or editing to replace missing or questionable data.

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Column Header	Objective	Frequency	Description
Meter and equipment standards	To ensure appropriate granularity (frequency of data collection), frequency of data communication, accuracy and validity of data.	Ongoing or event-driven.	Requirements for meter accuracy, calibration, precision & testing *and frequency of above.* This could include support of ANSI standards for the performance of the meter equipment or control devices for the equipment. There is a difference between the sample population and the normal target population and is dependent on the investment made by the utility.
Performance/ baseline	To ensure the methodologies and techniques used to calculate load response and/or recovery produce results that are within the required error tolerances (i.e., +/- X%).	Ongoing or event-driven.	Method(s) and techniques used to calculate the DR resource's expected load absent the DR instruction or request. Load response is the difference between its actual metered load and the calculated baseline. Baselines may vary depending on age of equipment and other criteria. The following questions may be answerd in the responses for performance/baseline: *How is the baseline calculated? How is an acceptable default reached for a utility operating in a non-ISO footprint?* In comparison to the wholeasle market, ISOs establish baselines and compare to usage immediately prior to an event.
Statistical sampling of non-interval metered loads	To ensure that the methodologies and techniques used to calculate load response and/or recovery create a statistically valid use alternative to interval metering for measuring DR performance or aggregations of loads, produce results that are statistically valid.	Ongoing or event-driven.	Methodology for creating a statistically valid alternative to universal interval metering, to include precision & accuracy requirements, sample size and selection requirements and bias control.
Deployment Limitations	Define any maximum number of events or hours of program deployment. *Limitations of the number of times the event is called, the length of an event, the % of participants*	N/A	Restrictions of program operation and /or participation. Limitations of the number of times the event is called, the length of an event, the % of participants

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Column Header	Objective	Frequency	Description
Regulatory and market context	*This would be helpful to identify the different regulatory contexts under which programs operate.*	N/A	Context under which the service or program is being offered.
Class of DR Resources	Notes:		
Submitter	These columns were added to indicate the submitters and the status of the programs described		
Status	These columns were added to indicate the submitters and the status of the programs described		
Product Type			
Category	Ancillary Services, Capacity, Energy Voluntary, Energy Price		
Program or Product Name	Need to compile a list of programs. Each ISO/RTO calls their products and programs different things. In order to track and define similarities and then translate that back to each ISO/RTO this field should include the program or product name		
When is Product expected to perform - Trigger events	Questionable on whether this is needed for development of M&V model business practices for the retail market - this column is needed for the ISO/RTO matrix. This trigger event will probably vary from company to company. Triggers require date and time stamps. Each ISO/RTO program or product has unique trigger events their products and programs different things. In order to track and define similarities and then translate that back to each ISO/RTO this field should include the trigger action for the program or product.		

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RETAIL MATRIX

NAESB RETAIL MATRIX AS OF MAY 16, 2008

Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
Capacity	Submitter	Dominion, Ripley Newcomb, 804-771-4637, ripley.newcomb@dom.com		Verification: Operate a pilot program to determine that at least 95% of devices both receive and respond to signal to turn off WH at the beginning of the program. Depending on the manufacturers and device, the verification may come from a signal back from device, a data logger, or an IDR on the meter. Ongoing, a sample of at least 250 devices should be tested at least every 5 years to determine the overall failure rate and to develop a net to gross ratio. This ratio will be applied to the deemed kW per customer reduction from the load study.	Data from IDR will be collected on monthly meter reading route for pilot and sample accounts. When program is implemented, the profiled reduction from the sample will be deemed to be the reduction for the program population. Monthly data will be required for PJM settlement	The customer's meter will continue to be used for billing determinants. The WH control switches should be included in the periodic meter tests to verify that 95% of the devices remain operational. The communication signal must be tested annually. Accounts in the load profile sample should have an end-use recorder on the water heater as well as a whole house recorder. Thirty minute interval data is adequate, although fifteen minute data on the water heater is considered preferable.	The algorithm that provides a reasonable estimate of normal customer usage absent any water heater interruption will be utility (and program specific). The CBL formula that is approved by the utility's ISO should be an acceptable default alternative.	An initial sample of 250 homes will provide a reasonably accurate estimate of load reduction that should be within =/- 5% of the true mean at a 90% confidence interval. The estimate for each demand reduction should be calculated with a 90% confidence level and the accuracy determined for each load reduction. An average error bound within +/- 10% will be considered to be accurate. If the net to gross operability study has remained at or above 90%, a sample of 100 homes will be adequate and should produce an error bound within =/- 5%. If net to gross operability drops below 90%, then a full sample of 250 homes will be required. If a tighter error bound is necessary, a larger sample will be required. (NOTE: This recommendation based on "PJM Deemed Savings for Legacy AC/WH Programs" report.)		
	Status	Program not in effect today								
	Product type									
	Category									
	Program or Product Name	Residential Water Heater Control Program								
	Trigger Events	when system load is critical (defined as ____) or when zone load is priced at or above $____ or transmission constraints in zone (defined as _____)								

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Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
Energy Price	Submitter	Dominion, Ripley Newcomb, 804-771-4637, ripley.newcomb@dom.com		Each customer site will provide a dedicated IBM compatible PC with a modem in order to receive the price transmissions and the telecommunication equipment needed for the company to communicate with the meter (dedicated phone line, cellular phone modem, etc.) The company will provide the software to allow receipt of the RTP prices as well as to perform analytical and graphical functions. The company will install an IDR . A rate contract will be executed to insure that the customer fully understands the rate and agrees to a one year minimum commitment. (NOTE: the existing RTP rate is currently closed to new customers.)	The company will maintain access through the provided phone line and will collected half-hourly load data every 24 hours.	Standard billing meter and IDR, meeting company standards for accuracy. Modem and phone line provided by customer.	See Dominion VA Power rate sch.. RTP, paragraph V. DETERMINATION OF BASELINE KW LEVELS, BASELINE ENERGY LEVELS, AND INCREMENTAL ENERGY USAGE.	Not sampled.		
	Status	Program not in effect today								
	Product type									
	Category									
	Program or Product Name	Real Time Pricing rate (RTP)								
	Trigger Events	when system load is critical (defined as ____) or when zone load is priced at or above $____ or transmission constraints in zone (defined as _____)								

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NAESB RETAIL MATRIX AS OF MAY 16, 2008

Specifics of the DR Program Being Described			M&V Aspects of the DR Programs						
Class of DR Resources			Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
Capacity	Submitter	Puget Sound Energy, Shannon McCormick, 425-256-2399, shannon.mccormick@pse.com	The pilot program is administered by EnerNOC for PSE. Participants are provided a no-cost site assessment of potential curtailable loads. Site enablement requires of demand pulse interval meter data and appropriate LAN connections. Five-minute interval meter data is continuously passed via an Internet LAN connection to the EnerNOC's network operations center in Boston, MA. The data is collected during the event, which can span from one to four hours. The participants are estimated to on average curtail 100 - 200 kW in the winter season (November - February) and 100 - 200 kW in the summer (May - September).	The pilot seeks to provide PSE to practical knowledge and performance data for customer facilities during winter and summer control events. Continuous, near real-time interval meter data supports measurement of capacity performance, baseline readings and development of the load adjustment. When the event is called, the participants are notified one hour ahead - for winter season notification windows (6 am to 9 am and 5 pm to 9 pm) and the summer	Demand pulse interval meters are installed at the participants sites as well as a pulse splitter to permit EnerNOC to receive the meter data.	Performance is calculated based on a baseline determined from the highest thee days out of the previous ten business days for a given participant.	Not applicable	The participants represent a mix of facility/operation/load types, of which a maximum of 24 participants can be accommodated in the program. The program is operational from November 2007 to December 2009. The financial incentives offered for participants in measured capacity curtailment is capped at $5000 per participant per season, (provided through $20/kW seasonal average curtailment).	The program is operational in King County, Washington, and falls under the jurisdiction of Washington Utilities and Transportation Commission. The rate schedule is Electric Schedule 249A.
	Status	Pilot program in effect today and began November 2007. The program will end in December 2009.							
	Product type	Direct Load Control							
	Category	Capacity							
	Program or Product Name	Commercial-Industrial Load control Pilot Program							

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Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
	Trigger Events	The program is triggered by weather conditions determined by PSE resource planners.			notification window (2 pm to 6 pm). Following each event, EnerNOC reports to PSE the five minute interval kW data files (for each site) covering the (10 business day) baseline calculation period, through to the end of the event day. PSE separately maintains its own 15 minute utility meter data files for evaluation purposes.					
Price and Capacity Program	Submitter	ConEd, Elena Futoryan, 212-460-2228, futoryane@coned.com		This is not a pilot. A revenue grade interval meter with phone lines is required. For customers -- 50 KW reduction, and for load aggregators -- 100 KW reduction, for 4 consecutive hours. Audit is required for the mandatory program. The rider has been approved. In 2007, the maximum was 6 hours per capability period. Any participation over 6 events or 4 hours is considered voluntary. May 1 to October 31 is the summer capability period for	The customers are billed on the data. The meters are 15 minute interval meters. The data is 15-minute interval data, and the baseload level should be met every hour - so the data is rolled up to hourly. The data is collected after an event is called. The data is stored in a time stamp meter.	Revenue grade interval meters must be used with appropriate telephone lines. Precision levels should be available.	Performance is calculated based on NYISO methodology for capacity and energy payments.	not applicable	The program is capped at 400 MW. The reservation payment is based on a two tier system.	NY PSC
	Status	In effect today								
	Product type									
	Category									
	Program or Product Name	Reservation Payment Program								

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RETAIL MATRIX

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Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
	Trigger Events	The program is triggered in heavy demand conditions as provided by the tariff. The trigger levels are under consideration now and may be changed.		the mandatory program. There is no winter capability option for the mandatory program at this time.						
Capacity	Submitter	Alabama Power, Neal Allen, 205-257-6579, hnallen@southernco.com		Two way communication devices. We send test and customers respond. Test periodically.. In addition, "in field" tests are performed periodically as well.	Interval metered data captured and maintained. Actual load evaluated when IS call occurs. Normal load levels evaluated when no call occurs. This allows for a determination of expected results when called. Program requirements are that customer drop to firm level during a call. No "reduction" constraints utilized.	Utilizes revenue quality meters.	The IS customer is required to cut load to the contracted firm load level. Actual load dropped is determined by evaluating pre and post event load levels of each customer.	N/A	Customer has options to choose various call constraints. Chosen option determines the credit amount to the customer for non-firm load.	PSC regulated tariff
	Status	In effect Today								
	Product type	Interruptible Load								
	Category	Capacity								
	Program or Product Name	Industrial Interruptible Program, IS Program								
	Trigger Events	During a System Reliability Alert "System Alarm" notice. Can be utilized for locational reliability issues if necessary.								

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Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
Capacity	Submitter	Alabama Power, Neal Allen, 205-257-6579, hnallen@southernco.com		Two way communication devices. We send test and customers respond. Test periodically.. In addition, "in field" tests are performed periodically as well. Generators are remotely started monthly for reliability purposes.	Two way communication confirms operating equipment.	Utilizes revenue quality meters.	No baseline requirements. Equipment rating and reliability testing determines expected reduction for a call.	N/A	Program rules set minimum 250 kW size to participate in the program. Program call constrained to 8 hours per day, 5 days per week, 240 hours per year.	PSC regulated tariff
	Status	In effect Today								
	Product type	Utilization of customer owned generation								
	Category	Capacity								
	Program or Product Name	Stand By Generator Program								
	Trigger Events	During a System Reliability Alert "System Alarm" notice. Can be utilized for locational reliability issues if necessary.								
Energy	Submitter	Alabama Power, Neal Allen, 205-257-6579, hnallen@southernco.com		Originally offered years ago prior to any qualification or auditing requirements. None exist today.	TOU metered data captured and maintained. No change or reduction constraints exist.	Utilizes revenue quality meters.	No performance levels expected therefore no baseline required.	N/A	Various TOU rates are available to customers meeting specific SIC codes. Some require separate metering for specific end uses such as irrigation pumps, electric	PSC regulated tariff
	Status	In effect Today								
	Product type	TOU Rates								
	Category	Energy price								

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RETAIL MATRIX

NAESB RETAIL MATRIX AS OF MAY 16, 2008										
Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
	Program or Product Name	TOU Rates							vehicle charging, etc.	
	Trigger Events	Various types of TOU rates exist for various types of residential, commercial, and industrial customers. Rates vary by fixed customer charge, season, and time of day. Majority of rates are based on summer and non-summer seasons with peak, intermediate, and off-peak rate periods.								
Capacity	Submitter	BGE, Ruth Kiselewich, 410-470-1361, ruth.c.kiselewich @bge.com		BGE tests a sample of switches periodically. Switch operability studies must be conducted every 5 years, according to PJM, Manual 19: Load Data Systems.	In addition to the periodic sampling of switch operability, BGE conducts Load Research Studies to estimate the average impact for each participant in the	For its Load Research Studies, BGE uses ANSI certified meters that have been approved by the PSC for load recording. PROVIDED FOR INFORMATION ONLY - BGE BELIEVES THAT THIS FUNCTION IS IMPACT	For the development of average impacts for water heating, BGE compares non-event days to event days using a comparison of means. The	Load data are obtained from meters that were installed on 65 customers' water heaters. This stratified sample design provides a confidence of 90% ± 10% accuracy. PROVIDED FOR INFORMATION ONLY - BGE BELIEVES THAT THIS FUNCTION IS IMPACT EVALUATION		
	Status	In effect Today								

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RETAIL MATRIX

NAESB RETAIL MATRIX AS OF MAY 16, 2008

Specifics of the DR Program Being Described			M&V Aspects of the DR Programs						
Class of DR Resources			Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
	Product type			program. PROVIDED FOR INFORMATION ONLY - BGE BELIEVES THIS FUNCTION IS IMPACT EVALUATION	EVALUATION	difference between these two (2) load shapes forms the average impacts. PJM requires average impacts for each hour between noon and 8 p.m. The non-event profile is comprised of the hottest days of the summer. PROVIDED FOR INFORMATION ONLY - BGE BELIEVES THAT THIS FUNCTION IS IMPACT EVALUATION			
	Category								
	Program or Product Name	BGE's Residential Water Heater Control Program (Rider 6)							
	Trigger Events	BGE can activate switches up to 15 times per year for reliability or economic reasons.							
Capacity	Submitt er	BGE, Mary Straub, 410-470-1416, mary.m.straub@bge.com		Customers interval meter data is captured on weekly basis. This hourly data is stored and facilitates the M&V analysis.	The Participant must have Company-approved interval metering and communications equipment to participate in this Rider.	If the customer is participating by using a metered generator then the generator data forms the basis of the incentive. If the customer is participating by reducing load, then a Customer Baseline Load (CBL) will be developed. In			BGE Rider. Settlements are made with PJM.
	Status	In effect Today							
	Product type	PJM Load Response program							
	Category	Voluntary (Capacity & Energy)							

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NAESB RETAIL MATRIX AS OF MAY 16, 2008

Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
	Program or Product Name	BGE's Load Response Program (Rider 24)								
	Trigger Events	Commercial Customer notifies BGE when they plan on initiating a load response event.								
Capacity	Submitt er	BGE, Ruth Kiselewich, 410-470-1361, ruth.c.kiselewich @bge.com		BGE tests a sample of switches periodically. Switch operability studies must be conducted every 5 years, according to PJM, Manual 19: Load Data Systems.	In addition to the periodic sampling of switch operability, BGE conducts Load Research Studies to estimate the average impact for each participant in the program. PROVIDED FOR INFORMATION ONLY - BGE BELIEVES THAT THIS FUNCTION IS IMPACT EVALUATION	For its Load Research Studies, BGE uses ANSI certified meters that have been approved by the PSC for load recording. PROVIDED FOR INFORMATION ONLY - BGE BELIEVES THAT THIS FUNCTION IS IMPACT EVALUATION	For the development of average impacts for air conditioning, BGE compares non-event days to event days using regression analysis. The model estimates the average impact provided a particular weather conditions. PJM requires average impacts for each hour between noon and 8 p.m.PROVIDED	Load data are obtained from meters that were installed on 100 customers' air conditioner units. This stratified sample design provides a confidence of 90% ± 10% accuracy. PROVIDED FOR INFORMATION ONLY - BGE BELIEVES THAT THIS FUNCTION IS IMPACT EVALUATION		
	Status	In effect Today								
	Product type									
	Category									
	Program or Product Name	BGE's Residential Air Conditioner Control Program (Rider 5)								

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RETAIL MATRIX

NAESB RETAIL MATRIX AS OF MAY 16, 2008										
Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
	Trigger Events	There is no limit to the number of times BGE can activate switches for reliability or ecomic reasons.					FOR INFORMATION ONLY - BGE BELIEVES THAT THSI FUNCTION IS IMPACT EVALUATION			

To the extent that NAESB can provide some protocols that would assist groups such as ISOs in evaluating the effectiveness of programs would be helpful.

Time of Use
Examples:
Schedule of prices published such the consumer can determine his energy consumption based in part on price signals published.

Real Time Pricing

Demand Charges

Peak Time Rebates

Planning Peak Alerts

Interruptible/Curtailable Management Rates

Thermal Storage/Energy Storage

Standby Generation Rates (emergency generators and distributed generators)

Smart Appliances

Ancillary Programs

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August 14, 2008
Via email and posting

TO:	**NAESB Executive Committee (EC) Members**
FROM:	NAESB Office
cc:	EC Alternates, Micki Schmitz, Mike Stender, Cynthia Corcoran, Paul Love, Mitchell Whitehead, Valerie Crockett, Ed Skiba, Michael Desselle, Andy Ott, Rana Mujerki, Kevin Kirby, Bill Phillips
RE:	NAESB Triage Actions Pending for R08012 to R08023 – Request Reply

Dear Triage Committee and EC members,

We have several requests to triage – R08012-R08023 -- all provided below as hyperlinks. The NAESB office recommends the following actions:

For R08012 – submitted by Micki Schmitz on behalf of Northern Natural Gas:

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add 2 detail (contract) level code values to Validation Code and Message elements in Nomination Quick Response (WGQ Standard No. 1.4.2) dataset, it should be assigned to the WGQ Information Requirements Subcommittee (IR). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ IR.
>
> The request notes that EDI shippers have requested that NNG generate an error message when nominated quantity is below EPSQ. The error is at a contract level, which will allows/ensures that the shipper sends lower quantities for each nomination of the contract.

For R08013 – submitted by Paul Love on behalf of Kinder Morgan Energy Partners

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add nominations Transaction Type code value to support wheeling service on Rockies Express Pipeline LLC, it should be assigned to the WGQ Information Requirements Subcommittee (IR). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ IR.
>
> The request notes that operational sales and purchase transactions are used on the Kinder Morgan family of pipelines.

For R08014– submitted by Paul Love on behalf of Kinder Morgan Inc.

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add a new nominations Transaction Type code value to support operational sales and operational purchases for nominations and all related documents where Transaction Type appears, it should be assigned to the WGQ Information Requirements Subcommittee (IR). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ IR.
>
> The request notes that wheeling service exists in the Rockies Express Pipeline LLC tariff and is defined as: the receipt of Gas by a Parking And Wheeling Service (PAWS) shipper, or for a PAWS Shipper's account, at a physical point or Hub Pooling Point within a specified Hub and the redelivery of Gas at a physical point within the same Hub.

For R08015– submitted by Paul Love on behalf of Kinder Morgan Energy Partners

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to modify the TPA to be streamlined to remove the Exhibits from the agreement and relegate such information as contained in the exhibits to operational worksheet(s), it should be assigned to the WGQ Contracts Subcommittee and the WGQ Electronic delivery Mechanisms Subcommittee jointly. There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of both subcommittees.
>
> The request notes that it is Kinder Morgan's opinion that including operational information in the TPA, as opposed to confining it to worksheet(s) outside the agreement, results in un-necessary administrative burdens that produce no practical benefit to anyone. It is Kinder Morgan's opinion that the operational details contained in the current Exhibits is fluid over time and that any change to this information is best resolved by the trading partners' operational contacts exchanging such information, as opposed to contract administrators amending the TPA to reflect such operational changes.

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For R08016– submitted by Micki Schmitz on behalf of Northern Natural Gas:

This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add a Reduction Reason code to Operator Scheduled Quantity, it should be assigned to the WGQ Information Requirements Subcommittee (IR). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ IR.

The request notes that the additional code value will be used to support existing business practices and to more accurately define decreased quantities for shippers and operators.

.For R08017– submitted by Mitchell Whitehead on behalf of Boardwalk Pipeline Partners, LP:

This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add a new transaction type code to the Transportation/Sales Invoice dataset and two new code values for the service requester level charge/allowance amount descriptor to the Transportation/Sales Invoice and the Service Requester/Charge Allowance Invoice datasets, it should be assigned to the WGQ Information Requirements Subcommittee (IR). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ IR.

The request notes that the addition of the transaction type 'Reservation/Enhanced Hourly Flow' to NAESB WGQ Standard 3.4.1 Transportation/Sales Invoice, and the code values (MIS) Miscellaneous and (SST) State Sales Tax for the data element 'Service Requester Level Charge/Allowance Amount Descriptor' to NAESB WGQ Standard 3.4.1 Transportation/Sales Invoice and NAESB WGQ Standard 3.4.4 Service Requester/Charge Allowance Invoice will identify transportation which exceeds hourly contract capacity rights for which authorization has been granted.

For R08018– submitted by Mitchell Whitehead on behalf of Boardwalk Pipeline Partners, LP:

This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add a new code value for Rate Identification Code, it should be assigned to the WGQ Information Requirements Subcommittee (IR). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ IR.

The request notes that the addition of 'Reservation and Commodity' as a new Rate Identification Code within the dataset Transactional Reporting – Firm Transportation is needed to better utilize the Rate Form/Type Code of 'Blended' when the rate is a combination of reservation and commodity.

For R08019– submitted by Mitchell Whitehead on behalf of Boardwalk Pipeline Partners, LP:

This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to change the usage for the data element 'Maximum Tariff Rate' from mandatory to sender's option within the dataset Award Download, and is lined to request no. R07018 as requested by Spectra Energy Transmission, it should be assigned to the WGQ Business Practices Subcommittee (BPS). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ BPS.

The request notes that if the TSP has market based rate authority and an award will have market based rates, there will not be a maximum tariff rate so therefore the data element should be sender's option, and the usage should change to accommodate market based rate authority.

For R08020– submitted by Valerie Crockett on behalf of TVA and other parties:

This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ) and the Wholesale Electric Quadrant (WEQ); and (3) because it is a request to provide for enhanced granularity for public utilities in identifying critical operational flow orders, it should be assigned to the WGQ Business Practices Subcommittee (BPS) and the WEQ Business Practices Subcommittee (BPS). Should it be determined that only one quadrant's standards are affected, then the assignment to change to reflect only that quadrant. There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of both the WGQ and WEQ BPSs.

The request notes that under the current implementation of FERC Order No. 698, the public utilities have signed-up to receive Operational Flow Orders and other Critical Notices. As a result of this implementation, the public utilities in many instances are receiving substantially more information, which does not have an impact on its operations. As a

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result of meeting the letter of the Order, the public utilities are finding the applicable notices have the potential of being lost in the volume of non-applicable notices. The request further notes that the Wholesale Electric Quadrant and the Wholesale Gas Quadrant should review how/which notices are sent to public utilities to reduce the risk of critical notices being missed or overlooked based on the volume of notices now being sent to public utilities.

For R08021– submitted by Mike Stender on behalf of El Paso Natural Gas:

This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to implement a minor adjustment to the Measured Volume Audit Statement to allow for 40 instances of the MEA segment in the QTY loop, it should be assigned to the WGQ Technical Subcommittee. There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ Technical Subcommittee.

The request notes that the NAESB standards permit multiple MEA segments but the EDI mapping permits only one.

For R08022– submitted by Micki Schmitz on behalf of Northern Natural Gas:

This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add a Rate Identification Codes in the transactional reporting data sets, it should be assigned to the WGQ Information Requirements Subcommittee (IR). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ IR.

The request notes that the additional code value will be used to support existing business practices and to more accurately define identify storage related transactional reporting.

For R08023– submitted by Cynthia Corcoran on behalf of Enbridge Energy Partners, LP:

This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to additional Surcharge Codes for Capacity Release Transactions, it should be assigned to the WGQ Information Requirements Subcommittee (IR). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ IR.

The request notes that the additional code values “Fuel Surcharge” and “Event Surcharge” should be added to the Surcharge Identification Codes in the Code Values Dictionary for Standards 5.4.1 – Offer Download, 5.4.2 – Bid Download, 5.4.3 – Award Download, 5.4.7 – Offer Upload, 5.4.9 – Offer Upload Identification, 5.4.18 – Bid Upload, 5.4.20 - Transactional Reporting – Capacity Release, 5.4.21 - Transactional Reporting – Firm Transportation and 5.4.22 - Transactional Reporting – Interruptible Transportation. These additions will clarify the surcharge types available for transactions.

If you have any questions on a specific request, please contact the requestor directly -- their email addresses are provided above. If you have any concerns on the above actions, please respond via email with your concern stated, and we will convene a conference call for its resolution. If no concerns are raised, then on August 28, triage notes will be posted on the NAESB web site indicating that the Triage Subcommittee and the EC agrees with the above actions, and the requests will be forwarded to the chairs of the subcommittees to which they have been assigned.

Business Practices Subcommittee Update
May 2008 – August 2008

August 19, 2008

Joint TLR Work with NERC

- Met June 26-27 with the NERC TLR Standard Drafting Team
  - Updated on market flow threshold field test
  - Discussed definition inconsistencies between WEQ-008 and the NERC Glossary
- Work continues on the System Operator's Reference Manual
- Next meeting September 29-30 in Orlando, FL to work on IRO-006-5

Status of Annual Plan Items

AP Item	Description	Status
1.a.i	Make changes to business practices as related to inclusion of the NERC Reliability Functional Model functional model entities as NERC undertakes the same efforts.	No requests have been submitted
1.a.ii	Continuous support of TLR Procedure in alignment with NERC efforts on TLR Phase II and Phase III which would be included in version 2 development	Reviewed draft standards recommendation on July 29th. Subcommittee is expected to take action on recommendation at September 22nd Meeting.
1.c.ii	Develop business practice standards to support Operate Within Limits (R03017)	N/A – Executive Committee Approved recommendation that declined standards request. No business practices are required.
1.d	Prepare recommendation for future path for TLR in concert with NERC, which may include alternative congestion management procedures.	BPS is recommending the completion date on this Annual Plan Item be moved to 2009 based on coordination effort required with NERC SAR/Standards Development process.

Status of Annual Plan Items

AP Item	Description	Status
6.a	Review/revise WEQ 006 to remove/revise mandatory requirements for Interconnection Time Monitor (R07019)	Complete – Recommendation was posted for formal comments on June 11, 2008.
6.b	Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)	Time and Inadvertent Management Task Force was established in June. Task Force has met multiple times. Currently reviewing draft changes for WEQ-006 and WEQ-007
6.e.iii	Modify NAESB definitions related to remaining business practices	Subcommittee reviewed proposed changes to definitions of terms included in WEQ-005, 006, 007, and 011 at July 29th meeting.

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	Item Description	Completion[1]	Assignment[2]
1	**Develop business practices standards as needed to complement reliability standards**		
	Develop business practice standards to support and complement NERC reliability standards, NERC policies and NERC standards authorization requests (SARs) using the NERC/NAESB Coordination Joint Standards Development Process as appropriate. Current NAESB activities underway to develop business practice standards that are supportive of this annual plan item are:		
	a) Make version 2 changes to business practices as requested.		
	i) Make changes to business practices as related to inclusion of the NERC Reliability Functional Model functional model entities as NERC undertakes the same efforts. Status: No requests.	As requested	BPS
	ii) Continuous support of TLR Procedure in alignment with NERC efforts on TLR Phase II and Phase III which would be included in version 2 development.[3] Status: Ongoing as NERC makes changes.	Ongoing	BPS[4]
	b) Develop business practices to support Coordinate Interchange – R05020 "Include a guideline for rounding schedules with partial mWh's in the coordinate interchange business practice WEQ BPS-002-000" Status: Underway.	2008	JISWG
	c) Operate Within Limits (R03017) as coordinated with the NERC schedule on the same development for reliability standards		
	i) Review the need to develop business practice standards to support Operate Within Limits (R03017) Status: Completed.	1st Q, 2008	SRS
	ii) Develop business practice standards to support Operate Within Limits (R03017) Status: Completed. No standards are needed at this time.	2nd Q, 2008	BPS
	d) Prepare recommendations for future path for TLR in concert with NERC, which may include alternative congestion management procedures[5] Status: Underway.	4th Q, 2008	BPS[6]
	e) Conduct analysis as to whether standards can be developed which outline a standardized process for the coordination and execution of emergency energy schedules. These would be complementary standards to EOP-002-2 Requirements R4 and R6 (SRS Analysis of EOP-002-2 R4 & R6) Status:Not Started	TBD	JISWG

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	Item Description	Completion[1]	Assignment[2]
f)	Review and evaluate whether to cutoff or put a size limit on the entities for which the standards apply Status: Completed	3rd Q, 2008	SRS

2 Develop business practice standards in support of the FERC RM05-25-000 and RM05-17-000 (OATT Reform)

a) Develop version 2 business practice standards to better coordinate the use of the transmission system among neighboring transmission providers. Such business practice standards would be based on recommendations from NERC's Long Term ATC/AFC Task Force and would involve revised procedures for the ATC calculation and/or revised protocols as determined by the final order.

Status: Underway using joint standards development process with NERC. Request R050004 was expanded to include the Order No. 890 (Docket Nos. RM05-25-000 and RM05-17-000) and Order No. 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002), "Preventing Undue Discrimination and Preference in Transmission Services", issued April 11, 2007).

i) Group 1: Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority

1.	Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority S&CP Requirements Status: Completed.	4th Q, 2007	ESS/ITS
2.	Conditional Firm Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Not Started.	3rd Q, 2008	ESS/ITS
3.	Annotations For ATC Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed	1st Q, 2008	BPS, ESS/ITS
4.	Load Forecast And Actual Load Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed.	1st Q, 2008	BPS, ESS/ITS
5.	Re-Bid Of Partial Service Business Practice Standards on a Single Transmission Provider's System associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed.	1st Q, 2008	ESS/ITS
6.	Preconfirmation Priority Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed.	1st Q, 2008	ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
	7. OASIS Exemptions Appendix Status: Completed.	4th Q, 2007	ESS/ITS
ii)	Group 2: Metrics; Redispatch Cost Posting		
	1. Metrics Related to Provision of Transmission Service (Paragraph 413 of Order 890) Status: Completed.	1st Q, 2008	ESS/ITS
	2. Metrics Related to Performance of Transmission Studies (Paragraphs 1308 through 1317 of Order 890 Status: Completed.	1st Q, 2008	ESS/ITS
	3. Redispatch Cost Posting • Monthly average cost of redispatch • A high and low redispatch for the month Status: Completed.	1st Q, 2008	ESS/ITS
iii)	Group 3: Network Service On OASIS		
	1. Use of OASIS to Make Electronic Requests to Designate and Terminate Network Resource Status: Underway.	3rd Q, 2008	ESS/ITS
	2. Ability to Query Requests to Designate and Terminate Network Resources and Allow for Queries of All Information Provided with Designation Requests Status: Underway.	3rd Q, 2008	ESS/ITS
	3. Masking of Designated Network Resource Operating Restrictions and Generating Cost Information Status: Underway.	3rd Q, 2008	ESS/ITS
	4. Procedural Requirements for Submitting Designations over new OASIS Functionality Status: Underway.	3rd Q, 2008	ESS/ITS
	5. Specify How Designated Network Service Informational Postings are Posted on OASIS Status: Underway.	3rd Q, 2008	ESS/ITS

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		Item Description	Completion[1]	Assignment[2]
	6.	Set Forth the Treatment of OASIS Requests when the Customer Fails to Provide the Necessary Attestation Status: Underway.	3rd Q, 2008	ESS/ITS
	7.	Procedural Requirements for Submitting Both Temporary and Indefinite Terminations of Network Resources Status: Underway.	3rd Q, 2008	ESS/ITS
	8.	Procedures for Submitting and Processing Requests for Concomitant Evaluations of Transmission Requests and Temporary Terminations Status: Underway.	3rd Q, 2008	ESS/ITS
iv)		Group 4: Pre-Emption; Request No. R05019; and Revisions to Standard 9.7		
	1.	Pre-Emption Status: Not Started.	3rd Q, 2008	ESS/ITS
	2.	Request No. R05019 Status: Not Started.	3rd Q, 2008	ESS/ITS
	3.	Revisions to Standard 9.7 Status: Not Started.	2nd Q, 2008	ESS/ITS
	4.	Posting of Existing Transmission Commitments (ETC) (moved from Group 1) Status: Completed. (Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	2nd Q, 2008	BPS, ESS/ITS
v)		Group 5: Paragraph 1377		
	1.	Paragraph 1377 Status: Not Started.	4th Q, 2008	ESS/ITS
	2.	Re-Bid Of Partial Service across Multiple Transmission Providers' Systems Status: Not Started	4th Q, 2008	ESS/ITS
vi)		Group 6: Miscellaneous (Paragraphs 1390 and 1627 of Order 890)		
	1.	Paragraph 1390 of Order 890 Status: Not Started.	3rd Q, 2008	ESS/ITS

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Item Description	Completion[1]	Assignment[2]
2. Paragraphs 1627 of Order 890 Status: Not Started.	3rd Q, 2008	ESS/ITS
3. Redispatch Cost Posting to allow for posting of third party offers of planning redispatch services. Status: Not Started	3rd Q, 2008	ESS/ITS
4. Posting of **Existing Transmission Commitments (ETC)** (moved from Group 1) Status: Completed. (Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	2nd Q, 2008	ESS/ITS
vii) Group 7: Tagging for Conditional Firm Service		
1. Tagging for Conditional Firm Service Status: Underway.	2nd Q, 2008	ESS/ITS
b) Develop the needed business practices as companion to the NERC standards for ATC related efforts.[7]		
i) Develop standards to support existing Request No. R05004. Status: Underway.	4th Q, 2008	BPS, ESS/ITS
1. The processing of transmission service requests, which use TTC/ATC/AFC,in coordination with NERC changes to MOD 001 where the allocation of flowgate capability based on historical Network Native Load impacts the evaluation of transmission service requests, requiring the posting of those allocation values in conjunction with queries of service offerings on OASIS Status: Not Started	4th Q, 2008	ESS/ITS
2. Remaining requirements documented in R05004 and R05004A. Status: Completed	3rd Q, 2008	BPS, ESS/ITS
ii) Develop Business Practice Standards for **Existing Transmission Commitments (ETC)**		

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NORTH AMERICAN ENERGY STANDARDS BOARD

2008 WEQ Annual Plan Approved by the Board of Directors on June 26, 2008 and Redlined Changes Suggested by the WEQ EC Leadership

	Item Description	Completion[1]	Assignment[2]
1.	Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed. (Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	2nd Q, 2008	BPS, ESS/ITS
2.	Business practice standards for accounting for counterflows. These standards will be included in the ATC business practice standards. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed (Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	June 1, 2008	BPS, ESS/ITS
iii)	**Capacity Benefit Margin (CBM) Business Practices**		
1.	Determine if business practice standards are needed, and if so, develop them to set forth "how the CBM value shall be determined, allocated across transmission paths, and used" and how transmission providers will "reflect the set-aside of transfer capability as CBM in the development of the rate for point-to-point transmission service." The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed, (The NAESB subcommittees have determined the CBM requirements have been documented in the NERC MOD-004 to address this item, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)~~Underway.~~	3rd Q 2008	BPS, ESS/ITS
2.	Business practice standards that include an OASIS mechanism to "allow for auditing of CBM usage." The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Underway.	3rd Q 2008	BPS, ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
	3. Any additional business practice standards needed to complement the NERC CBM reliability standards (MOD004) created as a result of this effort. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Underway.	3rd Q 2008	BPS, ESS/ITS
iv)	**Transmission Reliability Margin Business Practices:**		
	1. Transmission Reliability Margin (TRM): Business Practice Standards to complement the NERC reliability standards for TRM. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed (The NAESB subcommittees have determined TRM requirements have been documented in previously submitted recommendations, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	April 8, 2008	BPS, ESS/ITS
	2. The business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development Status: Completed. (The NAESB subcommittees have determined TRM requirements have been documented in previously submitted recommendations, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	April 8, 2008	BPS, ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
	3. Any additional business practice standards needed to complement the NERC TRM reliability standards (MOD008) created as a result of this effort. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed. (The NAESB subcommittees have determined TRM requirements have been documented in previously submitted recommendations, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	April 8, 2008	BPS, ESS/ITS
v)	Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)):		
	1. Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed. (The subcommittee determined no additional standards are required from what is already documented in the "ATC Information Link (2008 Annual Plan 2.b.vii)" recommendation and what is required for ATC postings under the previously ratified recommendation "Modifications to WEQ-001 to comply with modifications to 18 C.F.R. 37.6 and 37.7 within Order 890 with Minor Corrections applied on February 27, 2008". Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	April 23, 2008	BPS/ESS/ITS
	2. Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards including any OASIS posting requirements to achieve the data exchange. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed. (The NAESB subcommittees have determined the data exchange requirements have already been documented in the NERC standards, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	1st Q, 2008	BPS/ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
	3. Business practice standards that will set forth how transmission providers will post "explanations of the reason for a change in monthly and yearly ATC values on a constrained path." The standards will include a requirement that that the transmission provider posts the reason for the change in a narrative form. The posted information will include "the (1) specific events which gave rise to the change and (2) new values for ATC on that path (as opposed to all points on the network)." The business practices developed to address this item will not require to coordination with the NERC Order 890 reliability standards development. Status: Completed.	1 Q, 2008	BPS/ESS/ITS
	4. Business practice standards for posting on OASIS of the "underlying load forecast assumptions for all ATC calculations". The business practices developed to address this item will not require to coordination with the NERC Order 890 reliability standards development Status: Completed.	1st Q, 2008	BPS/ESS/ITS
	5. Business practice standards for posting on OASIS of the "actual daily peak load for the prior day." The business practices developed to address this item will not require to coordination with the NERC Order 890 reliability standards development Status: Complete.	1st Q, 2008	BPS/ESS/ITS
vi)	Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13 This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development. Status: Completed.	May 1, 2008	BPS, ESS/ITS

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		Item Description	Completion[1]	Assignment[2]
	vii)	Business practice standards to set forth the procedure for input on TTC and ATC methodologies and values. (During the Order 890 NERC and NAESB joint standards development effort, it was determined that the standards contained in MOD003 should be business practice standards instead of reliability standards. NERC has requested that NAESB adopt the standards as business practices via correspondence to Ms. McQuade, NAESB President.) This item will require coordination with the NERC Order 890 reliability standards development because the language to address this item is contained within a draft standards that addresses items that are dependent on NERC deliverables, i.e., the requirements to create an "ATC Information Link" on OASIS. There is no Order 890 cite for this item. Status: Completed. (Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if modifications to these standards are needed.)	1st Q, 2008	BPS, ESS/ITS
	c)	Develop version 1 business practice standards to support transparency reporting and related functions that may be required as a result of the final order. Status: Underway.	3rd Q 2008	BPS, ESS/ITS
3		**Develop business practices standards to improve the current operation of the wholesale electric market and develop and maintain business practice and communication standards for OASIS and Electronic Scheduling**		
	a)	Develop and/or maintain business practice standards as needed for OASIS and electronic scheduling. Specific items to address include:		
	i)	Develop OASIS S&CP changes to support OASIS business practices. Status: Dependent on development of OASIS business practices.	Ongoing	ESS/ITS
	ii)	Network Services: Determine and develop needed business practice standards or other support is needed to support use of OASIS for Network Service transactions (R04006E). (Related to AP 2(a)(iii)) Status: Underway.	2nd Q, 2008	ESS/ITS
	iii)	Registry (TSIN): Determine and develop needed business practice standards to support the registry functions currently supported by NERC (R04037). Status: Underway.		
		1) Work with the NAESB counsel to develop a confidentiality agreement	4th Q 2008	JISWG
		2) Transition the TSIN Registry from NERC to NAESB.	4th Q 2008	JISWG
		3) Review and correct the Coordinate interchange Business Practice Standard as noted during the development of the e-Tag 1.8 development process.	4th Q 2008	JISWG

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2008 WEQ Annual Plan Approved by the Board of Directors on June 26, 2008 and Redlined Changes Suggested by the WEQ EC Leadership

		Item Description	Completion[1]	Assignment[2]
v)		Document procedures used to implement the displacement/interruption terms of the Pro Forma tariff (R05019). Status: Not Started ~~(Related to request R05004)~~	4th Q, 2008	ESS/ITS
vi)		Make incremental enhancements to OASIS as an outgrowth of the NAESB March 29, 2005 conference on the future of OASIS (R05026). Status: Underway. Scoping statement completed by SRS and assignments made to BPS, ESS/ITS and JISWG.		~~BPS, ESS/ITS and JISWG~~
	1)	Represent ALL pre-Order 888 ("grandfathered") transmission and ancillary services in current use in OASIS Status: Completed	~~2008 as determined~~ 3rd Q, 2008	BPS, ESS/ITS
	2)	Eliminate Masking of TSR tag source and sink when requested status is denied, withdrawn refused, displaced, invalid, declined, annulled or retracted	2008 as determined	ESS/ITS
	3)	Initiate standard that requires ALL historical transmission service reservations to be available for review up to a number of years in the past.	2008 as determined	ESS/ITS
	4)	Initiate standard that eliminates the disparity of posting "sensitive" information. This standard should also include procedures of user certification that allows access to this class of information. Status: Underway.	2008 as determined	JISWG
	5)	Enhance the TSR result postings to allow showing of (i) limiting transmission elements and (ii) available generation dispatch options that would allow acceptance of reservation request.	2008 as determined	ESS/ITS
	6)	Standardize the availability of TSR study result postings, eliminating practice of some Transmission Owners that charge for viewing these documents. Status: Completed. This item was completed with Recommendation (2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3) WEQ-001 Changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting.	1st Q, 2008	ESS/ITS
vii)		Respond to issues in FERC Order No. 676 (Docket No. RM05-5-000) – NAESB WEQ Standards 001 9.7, (paragraph 51 of the order). Status: Underway. Assigned to group 4, reference 2007 WEQ AP item 2(a)(iv)(3).	2nd Q, 2008	ESS/ITS

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2008 WEQ Annual Plan Approved by the Board of Directors on June 26, 2008 and Redlined Changes Suggested by the WEQ EC Leadership

		Item Description	Completion[1]	Assignment[2]
b)		Develop and/or maintain standard communication protocols and cyber-security business practices as needed.		
	i)	Address the surety assessment findings on NAESB PKI standards. Status: Complete, will be provided as a response to the U.S. DoE upon completion by the WGQ for their response to the findings.	1st Q, 2008	JISWG
	ii)	Develop PKI standards for OASIS. Status: Not Started.	3rd Q, 2008	ESS/ITS
	iii)	Develop PKI Standards for e-tagging. Status: Underway. eTagging items are linked to the transition of the Registry from NERC to NAESB.	2008	JISWG
	iv)	Develop enhanced Electric Industry Registry (EIR), (R06027) Status: Underway. . The transition of the Registry from NERC to NAESB as part of this request should take place by yearend 2008.	2008	JISWG
c)		Develop needed business practice standards for organization/company codes for NAESB standards – and address current issues on the use of DUNs numbers. Status: Underway. Common code usage is linked to the transition of the Registry from NERC to NAESB.	2008	NAESB Staff with WEQ support
4		**Review and develop business practices standards to support e-Tariff program**		
		Develop business practices as needed to support the e-Tariff program including submittal of tariffs and metadata. (Docket No RM05-1-000) Status: Underway. Completed.	1st Q 2008	Joint WEQ/WGQ e-Tariff Subcommittee
5		**Review and develop business practices standards to Demand Response, Demand Side Management and Energy Efficiency Programs** Review and develop needed model business practices for a standardized method for quantifying benefits, savings, cost avoidance and/or the reduction in energy demand and usage derived from the implementation of demand side management and energy efficiency programs. This effort will include demand side response, energy efficiency programs and metering, including the 'curtailment service provider' program.		
a)		Develop matrix and business practice standards for measurement and verification for demand response programs in ISO/RTO footprint areas. Status: Underway.	3rd Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee

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	Item Description	Completion[1]	Assignment[2]
b)	Develop matrix and business practice standards for measurement and verification for demand response programs in non-ISO/RTO footprint areas. Status: Underway.	3rd Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee
c)	Develop preamble for business practice standards for measurement and verification for demand response and energy efficiency programs. Status: Underway.	4th Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee
d)	Develop glossary for business practice standards Status: Underway.	4th Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee
e)	Support retail development of matrix and model business practice standards for measurement and verification for demand response programs Status: Underway.	4th Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee
f)	Develop business practice standards to measure and verify energy reductions that are made to comply with a Renewable Portfolio Standard that included energy efficiency or a stand-alone Energy Efficiency Portfolio Standard. Status: Not Started.	Phase 2	Joint WEQ/Retail DSM-EE Subcommittee
g)	Develop business practice standards to factor Demand Control and Energy Efficiency programs into reliability / supply decisions at the wholesale level for generation and transmission planning and operations. Status: Not Started.	Phase 2	Joint WEQ/Retail DSM-EE Subcommittee
h)	Develop business practice standards for cap and trade programs for green house gas Status: Not Started.	Phase 2	Joint WEQ/Retail DSM-EE Subcommittee
6	**Maintain existing body of Version 1 standards**		
a)	Review/revise WEQ 006 to remove/revise mandatory requirements for Interconnection Time Monitor (R07019) Status: Completed.	2nd Q, 2008	BPS
b)	Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020) Status: Underway.	TBD	BPS

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	Item Description	Completion[1]	Assignment[2]
c)	Make consistency changes to Version 1.0 standards as directed by the WEQ Leadership Committee on December 12, 2007 (R08001 – BPS, ESS/ITS, R08002 - ESS/ITS, R08003 - ESS/ITS - BPS, R08004, R08005 - ESS/ITS) ~~Status: Not Started.~~	~~TBD~~	~~BPS, ESS/ITS~~
	1) OASIS Consistency Changes (R08001, R08002, R08003, R08005) ~~Status: Not Started~~ ~~Remaining requirements documented in R05004 and R05004A~~ ~~Status: Completed~~	20094th ~~Q, 2008~~	ESS/ITS~~ESS/ ITS~~
	2) Gas / Electric Communication Consistency Changes (R08004) Status: Not Started	TBD~~3~~rd ~~Q, 2008~~	BPS~~BPS, ESS/ITS~~
d)	Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources. (http://www.naesb.org/pdf3/weq_ec051308w2.doc) Status: ~~Underway.~~Completed.	~~3rd Q~~July~~,~~ 2008	BPS, ESS/ITS
e)	Modify NAESB definitions to address internal inconsistencies and inconsistencies with the NERC glossary, (http://www.naesb.org/pdf3/weq_ec051308w3.doc) Status: Underway.	4th Q, 2008	BPS, ESS/ITS
	i) Modify NAESB definitions related to OASIS Business Practices (001, 002, 003, and 013) Status: Underway.		BPS, ESS/ITS
	ii) Modify NAESB definitions related to Coordinated Interchange (004) and PKI Standards (012) Status: Underway.		JISWG
	iii) Modify NAESB definitions related to the remaining business practices Status: Underway.		BPS
f)	Review and evaluate whether to cutoff or put a size limit on the entities for which the standards apply	3rd Q, 2008	SRS

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NORTH AMERICAN ENERGY STANDARDS BOARD

2008 WEQ Annual Plan with proposed revisions from Executive Committee as of May 13, 2008 and Subcommittee Leadership as of June 3, 2008

PROVISIONAL ITEMS

1 Develop and or modify business practices related to support of NERC effort on the NERC Resources and Transmission Adequacy and Inadvertent Interchange Data Standards BAL-006 revisions.

Status: In review of the NERC development effort, Balancing Authority Controls (Project 2007-05), with Mr. Akens (TVA, NERC Drafting Team Leader) and Mr. Rodriquez (NERC Manager, Business Practice Coordination), it was determined that no changes would be required to NAESB standards. As such, NAESB leadership is not at this time determining if any development would be undertaken, which would then initiate a joint development effort. A letter to this effect was sent to NERC management. This assessment may however change as the NERC drafting team proceeds further in its development, so the provisional item remains on the 2008 WEQ Annual Plan.

2 Develop business practice standards as requested by the regional and state advisory groups.

3 Develop business practice standards as related to the Effectiveness Study of Competitive Wholesale Markets (Congressional Mandate), Electric Energy Market Competition Task Force, Docket No. AD05-17-000, issued by the FERC on October 13, 2005.

4 Develop and/or maintain business practice standards to support gas-electric interdependencies

- Respond to requests as received that are related to Docket No. RM05-28-000.
- Respond directives related to the conclusions of the NAESB reports submitted in FERC Order No. 698, Docket Nos. RM05-5-001 and RM96-1-027.

5 Review Market System Back-Up existing language and review of existing back-up language

6 Develop business practices for allocating capacity among requests received during a submittal window Order 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 - Paragraph 805).

7 Determine any needed NAESB action in support of the Interchange Distribution Calculator (IDC) and develop any necessary standards.

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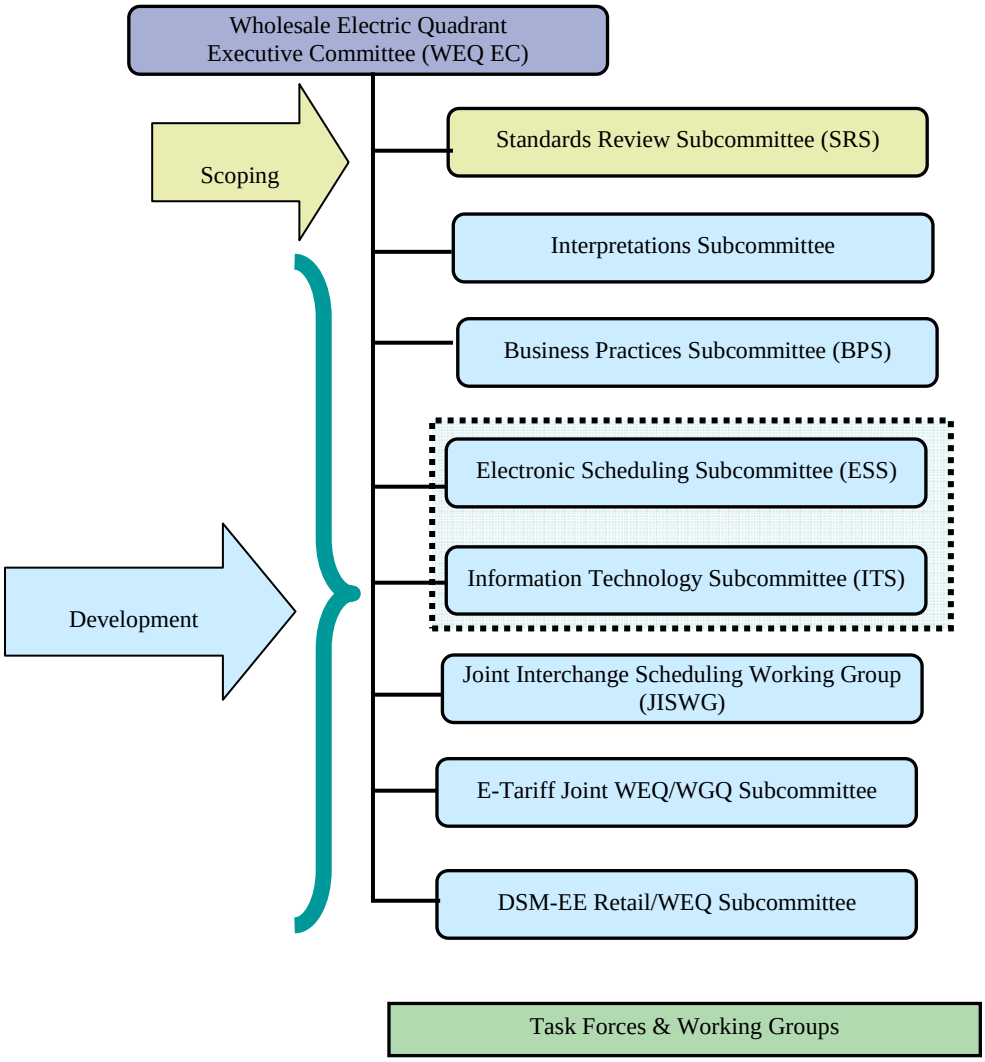

NAESB WEQ EC and Subcommittee Leadership:
Executive Committee: Kathy York (WEQ EC Chair) and Clay Norris (WEQ EC Vice Chair)
Standards Review Subcommittee: Narinder Saini, Ed Skiba
Interpretations Subcommittee: Robert Schwermann
Business Practices Subcommittee & Task Forces: Jim Busbin (TLR), Ed Skiba,
Electronic Scheduling Subcommittee/Information Technology Subcommittee & Task Forces: Paul Sorenson, J.T. Wood, Marcie Otondo
Joint Interchange Scheduling Working Group (JISWG): Bob Harshbarger (NAESB), Jim Hansen (NERC)
e-Tariff Joint WEQ/WGQ Subcommittee (e-Tariff): Jane Daly (WEQ), Keith Sappenfield (WGQ)
DSM-EE Joint Retail/WEQ Subcommittee: Ruth Kiselewich and David Koogler (Retail), Roy True and Paul Wattles (WEQ)

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End Notes WEQ 2008 Annual Plan:

[1] Dates in the completion column are by end of the quarter for completion by the assigned committee. The dates do not necessarily mean that the standards are fully staffed to be implementable by the industry, and/or ratified by membership. If one item is completed earlier than planned, another item can begin earlier and possibly complete earlier than planned. There are no begin dates on the plan.

[2] The assignments are abbreviated. The abbreviations and committee structure can be found at the end of the annual plan document.

[3] For additional information, please see: http://www.naesb.org/pdf3/weq_bps100407w4.ppt for Phase II changes and http://www.naesb.org/pdf2/weq_bps070907w4.doc for Phase III changes.

[4] Joint Development Procedure is to be used by the NERC TLR Drafting Team and NAESB BPS.

[5] [5] For additional information, please see comments submitted by PJM and MISO for this Annual Plan Item: http://www.naesb.org/pdf3/weq_aplan102907w1.pdf.

[6] Joint Development Procedure is to be used by the NERC TLR Drafting Team and NAESB BPS.

[7] The June 1, 2008 dates included in this Annual Plan Item are assigned as a result of FERC extending deadlines to both NERC and NAESB on ATC related Order No. 890 items.

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July 9, 2008

TO: NAESB Board Members, Posting for Interested Industry Participants

FROM: Jonathan Booe, Meeting Administration/Project Manager

RE: Draft Minutes from the NAESB Board of Directors Meeting – June 26, 2008

NORTH AMERICAN ENERGY STANDARDS BOARD
NAESB BOARD OF DIRECTORS MEETING
June 26, 2008 – Wyndham Greenspoint Hotel - Houston, TX
Draft Minutes

1. Administration and Welcome

Mr. Desselle welcomed the Board members and guests in the room and on the phone. Mr. Boswell read the antitrust guidelines. Mr. Booe read the roster of the Board members and quorum was established.

The Board of Directors took a brief recess while the NAESB Annual Meeting of the Members was conducted in accordance with Article IV of the Certificate. After discussion during the meeting of the members, Mr. True moved, seconded by Mr. Sappenfield, to adjourn the meeting of the members. The motion passed without objection. The meeting of the members adjourned at 9:10 AM Central.

The Board members reviewed the draft agenda included on page 14 behind tab 2 of the Board book. Mr. Buccigross moved, seconded by Mr. Lucas, to adopt the agenda as drafted. The motion passed without objection. The Board members reviewed the March 27, 2008 Board meeting minutes included on page 17 behind tab 3 of the Board book. Three minor corrections were made to the draft minutes. Mr. Lucas moved, seconded by Mr. Templeton, to adopt the minutes as drafted. The motion passed without objection. The final minutes are posted on the NAESB Board page: http://naesb.org/pdf3/bd032708fm.doc.

2. Reports from Board Committees

Resources Committee: Next, Mr. Brown provided an update of the work of the Resource Committee. The Committee's report was included behind tab 4 of the Board book, beginning on page 25. Mr. Brown noted that since the last Board meeting, the organization has had a net loss of 13 members. In an effort to bolster membership, the Resource Committee will contact those non-members involved in the Demand Response effort, request time on the agenda of the upcoming NARUC meetings, and continue to discuss the benefits of NAESB membership with the trade organizations. The NAESB office will also distribute a friendly reminder to members to include NAESB membership in their budgets for 2009. Mr. Brown noted that if each quadrant brought in five new members in the upcoming quarter, the organization would be back on track regarding the membership goals for the year. He challenged the Board members to meet that goal and stated that the NAESB office would provide an award for the quadrant that accumulates the most new members.

Retail Restructuring: Mr. Desselle noted that Mr. Bourbonnais is retiring and that the Parliamentary Committee will take the Retail Quadrant restructuring issue into consideration. The Parliamentary Committee will bring back a recommendation by yearend. Mr. Bourbonnais was thanked for his years of leadership in the NAESB organization.

3. Updates on specific standards development efforts

Next, the Board reviewed the progress of several standards development efforts underway.

WEQ and WGQ: e-Tariff Progress: Mr. Sappenfield provided the update for the e-Tariff efforts. The e-Tariff report was included behind tab 5, beginning on page 54 of the Board book. The e-Tariff standards and implementation guide were ratified by the membership on April 4 and filed with the FERC on April 15. On April 17 the FERC issued a Notice of Proposed Rulemaking regarding the e-Tariff filing with a comment period ending

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on May 29. The comments submitted by those in the gas and oil industry were generally supportive. The comments submitted by some members in the electric industry were not critical of the standard, but suggested alternative methods for electronic filing. Mr. Sappenfield noted that the comments were not unexpected based on discussions held at the EC and subcommittee meetings.

WEQ: FERC Order No. 890, Coordination with NERC, ATC deliverable deadlines, OASIS change progress: Ms. York provided an update of the NAESB standards development on FERC Order No. 890. The FERC Order No. 890 information begins on page 71 of the Board book behind tab 5. Ms. York noted that the ESS/ITS has met 14 times, the ESS/ITS and BPS have met 18 times, and there have been 9 WEQ Executive Committee meetings addressing the subcommittees' work since the last Board meeting. Of the 17 Order 890 ATC related items slated for the ESS/ITS and BPS, 13 have been completed, including TRM, Data Exchange, Load Forecast Postings, Daily Peak Load Postings, and TTC/ATC input, which are currently in the ratification phase. The subcommittees' are currently addressing CBM and Commissioner Wellinghoff's concurring opinion in Order 890-A requesting modifications to certain ancillary services to include demand response.

In response to the ESS/ITS and BPS subcommittees' request for direction concerning the controversial ATC Information List, the WEQ Executive Committee organized a task force to review the List and make a determination regarding its future. The task force met on June 6, 2008 and will meet again in mid July to continue discussions and propose a recommendation that will be posted for the 30 day formal comment period.

The ESS/ITS has completed Group 1 (Conditional Firm; Annotations for ATC; Load Forecast and Actual Load; Rebid of Partial Service; and Preconfirmation Priority) and Group 2 (Metrics and Redispatch Cost Posting) of the Order 890 Work Plan and has had several meetings to address Group 3 (Network Resources). In April, the ESS/ITS suspended the work concerning Network Resources in order to address the time sensitive Conditional Firm standards requested in paragraph 592 of Order 890-A, which set a filing deadline of July 14, 2008. Despite the valiant efforts of the subcommittee, the recommendation was not voted out of subcommittee in time to met the deadline established by Order 890-A. Currently, the Conditional Firm standard is out for the 30 day formal comment period ending July 25, 2008, after narrowly passing a subcommittee vote on June 24, 2008. The NAESB office will file a request for a deadline extension through the end of August, so that there will be ample time, if needed, to vet the controversial standard through the Executive Committee.

Ms. York also noted that the coordination with NERC regarding the Order 890 standards has been going well and that the subcommittee will review Order 890-B, which was issued June 24, 2008, at their next meetings.

WGQ: FERC Order No. 698 approach, schedule, progress and correspondence: Ms. Crockett provided the update of the work of the WGQ Business Practices Subcommittee to address FERC Order No. 698. The FERC Order No. 698 information begins on page 105 of the Board book behind tab 5. Ms. Crockett noted that the WGQ BPS has been addressing Order No. 698 for almost a year and that of the three topics involved, 7b (Alternate Receipt Points Upstream of or an Alternate Delivery Point Downstream of a Point of Constraint) is the only item that has been fully vetted and is complete. The standards and definitions related to 7a (index-based capacity release) were voted out of the WGQ Executive Committee yesterday and will be distributed for member ratification very soon. The IR and Technical subcommittees will be addressing the technical implementation of the approved standards for 7a and will be proposing a recommendation. The last topic, 7c (intraday nomination timeline), has been completed by the subcommittee with a recommendation that no action be taken on the item. The no action recommendation is out for formal comment until July 2, 2008 and will be voted on during a subsequent single topic WGQ Executive Committee meeting on July 14, 2008.

Ms. Crockett stated that waiting for the IR and Technical subcommittees to fully staff the index-based capacity release standards would postpone the Order 698 FERC filing until the end of the year, at the earliest. She made a motion to direct the NAESB office to send the index-based capacity release recommendation out for member ratification immediately and to file the completed Order 698 items with the FERC after the July 14, 2008 WGQ Executive Committee meeting. Mr. Ellsworth seconded the motion. Ms. McQuade noted that following yesterday's Executive Committee meeting, concern was expressed about postponing the Order 698 filing until the index-based capacity release recommendation had been fully staffed, as they are expecting a filing from NAESB sooner than first

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quarter 2009. She also noted that if the Board recommends that NAESB proceed with a filing of the index-based release standards and definitions completed to date, that it will be explained that a subsequent filing containing the technical implementation of those standards will be made at a later date. Mr. Kruse stated that if the FERC is focused on receiving the intraday timeline piece of the Order 698 filing, he suggests bifurcating the filing, providing the FERC the intraday timeline recommendation immediately and the index-based release piece once fully staffed. Ms. McQuade stated that she supported Mr. Kruse's recommendation and that she could discuss it with the FERC staff. Mr. Novak noted that 7b (Alternate Receipt Points Upstream of or an Alternate Delivery Point Downstream of a Point of Constraint) is also fully staffed and complete and that there is no reason why it could not be included in the initial filing. He also stated that the technical implementation of the index-based release recommendation should be given high priority so that it can be timely filed after the standards and definitions. The participants discussed the priority the IR and Technical Subcommittees should give to completing 7b with respect to the Order 712 work, and determined that both should be considered high priority.

Mr. Desselle asked if Ms. Crockett and Mr. Ellsworth would consider the suggestions to file the redirect and intraday timeline recommendations after the July 14, 2008 WGQ Executive Committee meeting and to highlight the index-based capacity release work as high priority on Annual Plan, as modifications to the motion. It was noted that Ms. McQuade would discuss the plan with the FERC staff to determine if the approach of two separate filings – one with redirects and nominations deadlines and another with the fully staffed indexed pricing for released capacity would be appropriate. Ms. Crockett and Mr. Ellsworth agreed to the modifications. Mr. Desselle asked the participants if there is any more discussion on the motion. None was offered. The motion passed without opposition. Ms. McQuade noted that she would discuss such with FERC staff regarding a two-staged filing, to provide FERC and the industry with the work completed to date and the indication that NAESB reached the conclusion that no changes were needed at this time for the nominations deadlines as no consensus could be reached on any adjustments.

WEQ and Retail: DSM/EE efforts: Next, Mr. Wattles provided an overview of the WEQ DSM/EE efforts. The materials were included behind tab 5, beginning on page 154 of the Board book. On the wholesale side, the subcommittee is currently on schedule to submit the Demand Response Measurement and Verification standards by September 30, 2008. To this end, the subcommittee is continuing to focus their efforts on defining and distilling a baseline methodology and converting the various elements of the Wholesale Matrix into standards language. The subcommittee has been meeting regularly and having bi-weekly conference calls. Mr. Wattles also noted the leadership of ISO New England's Eric Winkler and Bob Laurita and thanked them for moving the effort forward. Ms. McQuade noted that on the retail market, the team is reviewing air conditioning load programs and dispatchable direct load programs and mapping them for validation against the retail matrix. This effort is being coordinated with the Association of Edison Illuminating Companies (AEIC) Load Research Committee. The next DSM/EE meeting is scheduled for July 30, 2008 in Carmel, Indiana. Mr. Brown added that the publicity surrounding the effort should be very beneficial for NAESB as an organization, both in the eyes of the FERC and at the regional and state levels. He urged the Board members to take advantage of this opportunity and garner support from the various trade organizations for NAESB and the standards the organization is developing. Mr. Wattles noted that representatives from FERC have recognized the efforts of NAESB at several meetings over the last few months.

Retail: Texas Registration Model, Interest in Customer Choice Programs and NAESB Standards: Ms. McKeever reviewed Retail efforts found on page 196 behind tab 5 of the Board book. The Retail quadrant has been focusing their efforts on completing the Technical Guidelines for the Texas Registration Model in time for the NAESB publication date. To meet the deadline, the group has used a streamlined process by focusing their efforts on the transactions that match the model business practices, and delaying completion of the items that could be left up to the states. This is a less prescriptive, less detailed process that could be used in other Retail efforts. The group has made a lot of progress in very little time, thanks to the efforts of Jennifer Teel, Denise Rager, Susan Munson, Cade Burks, Ray Giuliani and the others involved from ERCOT.

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4. Executive Committee Reports

Mr. Buccigross noted that the highpoints of Order 698 and e-Tariff had already been discussed and reviewed the proposed changes to the WGQ 2008 Annual Plan, including changes to support Order No. 712. Mr. Desselle asked that the vote to approve the WGQ 2008 Annual Plan be held until all three Annual Plans have been reviewed, so that they may all be considered together. Mr. Novak reviewed the proposed revisions to the Retail 2008 Annual Plan and noted that most of the revisions concerned modifications to expected completion dates. Ms. York provided a review of the proposed revisions to the WEQ 2008 Annual Plan. Mr. Lucas moved, seconded by Mr. Burks to adopt the proposed revisions to all three annual plans.

5. Membership and Financial Reports

Ms. McQuade reviewed the membership report included on page 237 of the Board book, behind tab 7. The membership profile reflects an 11 member loss from year end 2007 to today. In many cases, the losses can be attributed to members who joined to address single topics which are now complete and members who have held duplicate membership in other segments and quadrants. Mr. Desselle encouraged the Board members to reach out and bring in some new members, as the membership directly affects revenues. There were no questions regarding the membership report. The 2008 Financial Report and budget accrued as of May 2008 are included in the Board book, beginning on page 251 behind tab 7. Ms. Wishart provided a comparison of the income and expenses through May 2008 and the 2008 budget. The organization has a gross income of approximately $1,567,000 through May 2008 and $815,000 in expenses, giving us a net income of $752,000. This puts the organization $55,000 under the net income budget projection for May of 2008 ($807,000). This shortfall can be directly attributed to the loss of members and the increased number of meetings this year. Ms. McQuade noted that page 256 of the Board book contained a comparison of the meeting statistics from January to May 2007 to January to May 2008. The numbers reflect a 53% increase in the number of hours spent on conference calls and a 9% to 10% increase in the number of hours spent in face-to-face meetings. Ms. McQuade also noted that the NAESB office has taken action to reduce expenses by renegotiating our telecommunication contract with our carrier as well as changing our health insurance provider.

Mr. Desselle stated that he would like to create a committee of the Board to investigate the possibility of raising membership dues as well as revenue generated from other sources, and ask that committee to bring back a recommendation at our next Board meeting. Mr. Hebenstreit also suggested that the committee consider stricter enforcement of the NAESB copyright policy. Mr. Desselle supported the suggestion. Mr. Boswell stated that in September he would distribute a letter to the general counsels of companies explaining the NAESB copyright policy and request compliance. Mr. True also suggested adding a statement about copyright infringement to the NAESB newsletter. The members discussed the importance of enforcing the NAESB copyright policy. There were no further questions regarding the financial report

6. Review and Possible Consideration for Vote Procedure Changes to Support Segment Block Restrictions

Next, Mr. Desselle reviewed the proposed modifications to the NAESB Certificate. The modifications are highlighted on page 258 of the Board book under tab 8. He suggested that the Board postpone the vote on the modifications until the next meeting, so that the parliamentary committee may have an opportunity to discuss the modifications and identify other conforming changes to other governance documents (bylaws and standard operating procedures). Ms. McQuade noted that the parliamentary committee should also consider the restructuring of the retail quadrants. Mr. Desselle stated that he would ask that the parliamentary committee bring a recommendation to the Board no later than yearend.

7. Plan for March 2008 Board Meeting

Mr. Desselle noted that the September Board meeting is scheduled for September 25 at the Wyndam Greenspoint in Houston, and that during that meeting the members will conduct usual business as well as be updated on the

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membership and financial issues discussed today and review the roles and responsibilities of Board membership. The Board members were asked to contact Ms. McQuade if they had any agenda items that should be addressed.

8. Old and New Business

Ms. McQuade provided an update of the NAESB liaisons with various external groups. Since the last Board meeting, there has been significant interaction with the FERC Commissioners regarding the standards, and the Commissioners have expressed great interest in demand side management, Order No. 890, and Order No. 698. The NAESB office has also been working closely with NERC to ensure that the Order No. 890 work remains coordinated. The WEQ subcommittees have developed several standards that, while driven by the NERC standards, have been completed before the NERC standards have been finalized. To combat any potential issues that could arise given the situation, all recommendations related to the NERC standards include a coversheet explaining that the subcommittee chairs will review the standards for inconsistencies once the NERC standards have been finalized.

Ms. McQuade and Mr. Minneman met with the Illinois Commerce Commission to review the NAESB retail standards in conjunction with the state's Customer Choice Program. In addition, Ms. McQuade accepted a seat on the National Petroleum Council. Mr. Desselle also noted that a filing has been submitted to the FERC officially dissolving the Joint Interface Committee.

9. Adjourn

Mr. Templeton moved to adjourn and Mr. Buccigross seconded the motion. The meeting adjourned at 11:30 AM Central.

10. Board Attendance (Vacancies Omitted)

Wholesale Gas Quadrant

PRODUCERS SEGMENT		**ATTENDANCE:**
Jay Ellzey	Vice President Commercial Operations, Chevron Natural Gas	In Person
William T. Benham	Vice President – Regulatory Affairs, BP Energy Company	
Keith Sappenfield	Regional Director – US Regulatory Affairs, EnCana Oil & Gas (USA) Inc.	In Person
Marty Patterson	Vice President – Commercial Operations, Foothills Energy Ventures LLC	Phone
Pete Frost	Director - Regulatory Affairs, ConocoPhillips Gas and Power Marketing	In Person
PIPELINE SEGMENT		
Jim Goldmann	Vice President - Transportation Services and Development, Alliance Pipeline LP	
Bill Grygar	Vice President, Panhandle Eastern Pipe Line	In Person
Susanna B. Barry	Vice President – Commercial Operations, Tennessee Gas Pipeline Company	In Person
Anne Bomar	Vice President, Dominion	
Richard Kruse	Senior Vice President, Spectra Energy Transmission	In Person
LOCAL DISTRIBUTION COMPANY (LDC) SEGMENT		
Clifton Olson	Vice President of Supply and Transmission, Energy East Corporation	
Adrian Chapman	Vice President, Regulatory Affairs & Energy Acquisition, Washington Gas	
Amy Hamilton	Vice President, Regulatory Affairs & Energy Acquisition, Washington Gas	
Mike Novak	Asst. General Manager, National Fuel Gas Distribution Corporation	In Person
Lee Stewart	Senior Vice President, Gas Transmission, Southern California Gas Company	

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END USERS SEGMENT		
Valerie Crockett	Senior Energy & Policy Specialist, Tennessee Valley Authority	In Person
Timothy W. Gerrish	Director of Origination-Energy Marketing and Trading, Florida Power & Light	
Tina Burnett	Natural Gas Resources Administrator, The Boeing Co.	In Person
Lori-Lynn C. Pennock	Senior Fuel Supply Analyst, Salt River Project	Phone
Jim Templeton	Principal, Comprehensive Energy Services	In Person
SERVICES SEGMENT		
John Bretz	Vice President - Gas Marketing, Anadarko Energy Services Company	
Jim Buccigross	Vice President Energy Industry Practice, Group 8760 LLC	In Person
Bill Hebenstreit	Manager – Contract Administration, Cheniere Marketing, Inc.	In Person
Rusty Braziel	Managing Director, Bentek Energy, LLC	In Person

Retail Electric Quadrant

DISTRIBUTORS SEGMENT		
David Koogler	Director – State Regulation, Dominion Virginia Power (SERC NERC Region)	In Person
Dennis Derricks	Director Regulatory Policy and Analysis, Integrys Energy Services, Inc.	
Ruth Kiselewich	Director Special Projects and Supplier Services, Baltimore Gas & Electric Company (MAAC NERC Region)	Phone
Debbie McKeever	Market Advocate, Oncor	In Person
END USERS SEGMENT		
Sonny Popowsky	Consumer Advocate, Pennsylvania Office of Consumer Advocate	
SERVICE PROVIDERS SEGMENT		
Jim Minneman	Director of Business Services, PPL Solutions LLC	Phone
J Cade Burks	President, EC Power	In Person

Wholesale Electric Quadrant

TRANSMISSION SEGMENT		**SUBSEGMENT:**	**ATTENDANCE**
Dan Klempel	Director Transmission Regulatory Compliance, Basin Electric Power Cooperative	Muni/Coop	
John E. Lucas	Director - Transmission Policy and Services, Southern Company Transmission	IOU	In Person
Jerry Smith	Alliance/Partnership Manager, Arizona Public Service Co.	IOU	
Jill Horswell	Director of FERC Compliance, Southern California Edison	at large	Phone
Terri Grabiak	Director – FERC and RTO Internal Affairs, Allegheny Energy, Inc.	at large	Phone
Michael Wells	Director – Market-Operations Interface, WECC	at large	
GENERATION SEGMENT			
Curtis Winterfeld	Vice President of Power Marketing, Deseret Generation & Transmission Cooperative	Muni/Coop	In Person
Belinda Thornton	Senior Manager – Real Time Trading, Tennessee Valley Authority	Fed/State/Prov.	
Lou Oberski	Director – Electric Market Policy, Dominion Resources Services, Inc.	IOU	Phone

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Charles W. Severance	Manager – Supply & Wholesale Services, Integrys Energy Services, Inc.	IOU	Phone
Ron Mucci	Manager – Regulatory Affairs, Williams Power Company	At-Large	Phone
Gloria Ogenyi	Vice President Energy Policy, Conectiv Energy Supply, Inc.	Merchant	
MARKETERS/BROKERS SEGMENT			
Roy True	Manager of RTO Market Development, ACES Power Marketing	Muni/Coop	In Person
Jeff Ackerman	Manager, Colorado River Storage Project Energy Management and Marketing Office, Western Area Power Administration	Fed/State/Prov.	
Jim Cashin	Senior Manager of Policy, Electric Power Supply Association (EPSA)	at large	In Person
Sam Forrest	Vice President, Energy Marketing and Trading, Florida Power & Light	IOU	
R. Scott Brown	Vice President and Director, Exelon Generation Power Team	IOU	In Person
Rick Smead	Director, Navigant Consulting, Inc.	At-Large	In Person
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT		**SUBSEGMENT:**	
Arthur G. Fusco	Vice President and General Counsel, Central Electric Power Cooperative Inc.	Muni/Coop	Phone
Barry R. Lawson	Manager-Power Delivery, National Rural Electric Cooperative Association	Muni/Coop	In Person
Leonard Haynes	Executive Vice President – Supply Technologies, Renewables and Demand Side Planning, Southern Company Generation	IOU	Phone
Frank Johnson	Senior Vice President Electric Transmission and Distribution, Consumers Energy	IOU	
Thomas Burgess	Director – FERC Compliance, FirstEnergy Service Company	at large	Phone
Joe Hartsoe	Managing Director – Federal Policy, American Electric Power Service Corp.	at large	
Bruce Ellsworth	New York State Reliability Council	At-Large	In Person
END USERS SEGMENT			
Thomas G. Dvorsky	Director of the Office of Electricity, Gas and Water at the New York State Department of Public Service	Regulator	
Michehl Gent	Open Access Technology International, Inc.	At-Large	In Person
INDEPENDENT GRID OPERATORS/PLANNERS			
Michael Desselle	Vice President Process Integrity, Southwest Power Pool		In Person
Ray Giuliani	Vice President Market Operations, Electric Reliability Council of Texas (ERCOT)		In Person
Kevin Kirby	Vice President Market Operations, ISO New England, Inc.		Phone
Rana Mukerji	Vice President Market Structures, New York Independent System Operator, Inc. (NYISO)		Phone
Andy Ott	Vice President Markets, PJM Interconnection		
Bill Phillips	Vice President Interregional Coordination & Policy, Midwest ISO (MISO)		Phone
Don Tench	Director Planning & Assessments, Independent		Phone

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Electricity System Operator (IESO)

Retail Gas Quadrant

DISTRIBUTORS SEGMENT		
Alonzo Weaver	Vice President of Engineering and Operations, Memphis Light, Gas & Water Division	
William Bourbonnais	Vice President – Transmission, Wisconsin Public Service Corporation	
Ralph Cleveland	Senior Vice President – Engineering and Operations, AGL Resources, Inc.	
SERVICE PROVIDERS SEGMENT		
Leigh Spangler	President, Latitude Technologies Inc.	In Person
Dave Darnell	President & CEO, Systrends USA	
Greg Lander	Principal, Commerce Energy Group	

11. Other Attendance

Name	Organization	Attendance
Jeb Bartley	Accenture	In Person
Jonathan Booe	NAESB	In Person
Bill Boswell	NAESB	In Person
Tammy Bramlett	Tennessee Valley Authority	In Person
Kathryn Burch	Spectra Energy Transmission	In Person
Christopher Burden	Williams Gas Pipeline	In Person
Deonne Cunningham	NAESB	In Person
Dale Davis	Williams Gas Pipeline	In Person
Ed Davis	Entergy	In Person
Michael DiCarlo	Williams Gas Pipeline	In Person
Chuck Feagans	Tennessee Valley Authority	Phone
Melody Fontenot	BG Energy Merchants	In Person
Cory Galik	NAESB	In Person
Michael Goldenberg	FERC	Phone
Mark Gracey	Tennessee Gas Pipeline	In Person
Bill Griffith	El Paso Natural Gas	In Person
Bill Lohrman	FERC	Phone
Annunciata Marino	PA Public Utility Commission	Phone
Rob Martinko	First Energy	In Person
Rae McQuade	NAESB	In Person
Art Morris	Florida Power and Light	In Person

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Name	Organization	Attendance
Susan Munson	ERCOT	In Person
Joelle Ogg	Brunenkant & Cross, LLP	In Person
Marcie Otondo	Arizona Public Service	Phone
Thomas Pearce	Public Utilities Commission of Ohio	Phone
Phil Precht	Baltimore Gas & Electric	Phone
Denise Rager	NAESB	In Person
Ron Ruckman	Dynegy	In Person
Gwen Schoepp	Williston Basin Interstate Pipeline	In Person
Ronald Tomlinson	Dominion Transmission	Phone
Veronica Thomason	NAESB	In Person
Kim Van Pelt	Panhandle Eastern Pipeline	In Person
Paul Wattles	ERCOT	In Person
Jill Web	Preferred Legal Services	In Person
Larry Williford	OnCor	In Person
JT Wood	Southern Company	Phone
Charles Yeung	SPP	In Person
Kathy York	Tennessee Valley Authority	In Person
Randy Young	Boardwalk Pipelines	Phone
Darla Wishart	NAESB	In Person

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via email, August 15, 2008

RE: NAESB Update Notes

EFFORT	NOTES
FERC Order No. 698:	• Business practices for redirecting firm gas transportation from one delivery point to another and pricing released gas transportation capacity based on published indices are complete. • Business practices for introducing additional or more flexible gas transportation timelines for firm service to better match the electric market clearing times was stalemated in the Executive Committee. Three models were considered – one proposed by electric utilities (TVA/APS), one by an electric marketer (FPL Energy) and one by a collaboration of pipelines. All failed to get the requisite super majority vote. Key issues are the FERC policy on no bumping interruptible service in the last nomination period, on the requirement for four hours for pipelines to process each nomination period, the recognition that some gas producers do not operate on a 24 hour basis, possibly be required to make field adjustments at night if timelines are shifted, and the increased value of firm transportation over interruptible transportation should additional bumpable cycles be added. • All of these efforts bring more flexibility to the gas market in not only serving the electric market but also local gas distribution companies and other end users of natural gas. As more firm gas transportation is used, stronger market signals are sent for investing in improved and expanded gas pipeline infrastructure. • The results will be filed with the FERC in August. The FERC may choose to take action on the nomination cycles or ask NAESB to look at other aspects with guidance to resolve the problems reaching consensus. Several state commissions have weighed in on the comment periods and were active in the discussions.
FERC Order No. 890:	• We asked for an extension to August 29 for filing standards supporting conditional firm service and were granted such. The standards were to be filed on July 14 as noted in FERC Order No. 890-A. • The reasons for asking for the extension included a shift of focus from other ATC issues to conditional firm when Order 890-A was released which did not afford our subcommittees enough time to prepare the standards. Key points of debate include: (1) the amount of detail to be provided in the posting real-time information on OASIS to support conditional firm service, (2) the business practices to be developed to support the procedures for resales of conditional curtailment option reservations, and (3) the business practices to be developed to support the procedures for the allocation of capacity as it becomes available for conditional firm service. • Resales, probably the key disagreement in the conditional firm service discussions may be more easily resolved since the release FERC Order No. 676-C. Of most interest to the discussion, as noted in paragraph 59 of the order: *"As the Commission explained in Order No. 890-A, and reiterates above, the reassignment of transmission capacity results in the reseller obtaining the right to schedule the reserved capacity during the period of the reassignment consistent with the original customer's reservation. This applies equally to long-term firm point-to-point service using the conditional firm option adopted in Order No. 890. We conclude that the NAESB standards adequately address resales of conditional firm transactions. WEQ-001-11.1 makes clear that confirmation of a resale "shall also convey any outstanding conditions that may exist on the Parent Reservation (such as conditional approval pursuant to section 13.2(ii) of the OATT)." WEQ-001-11.7 and WEQ-001-11.7.1 also address the transmission provider's right to nullify resale transactions when a higher priority transaction displaces a lower priority transaction and when those rights apply to conditional firm transactions."* • All FERC Order No. 890 efforts are coordinated with NERC, and indeed procedures have been set to ensure that if NAESB is ahead of NERC in processing the standards, there is a checkpoint once NERC concludes its effort to double back and see if additional changes are needed. This procedure is employed for the development efforts that in the first review have been deemed not to have a strong tie between NAESB and NERC. • All other FERC Order No. 890 issues are on schedule and several have already been completed. As conditional firm standards complete, we will work with FERC to determine which of the efforts already complete should be filed.
FERC Order No. 676-C:	• On July 21, (Docket No. RM05-5-005), FERC incorporated into its regulations the latest version of NAESB standards.

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EFFORT	NOTES

	• Key points made in the order included:
	  • The Federal Energy Regulatory Commission (Commission) is revising its regulations to incorporate by reference the latest version (Version 001) of certain standards adopted by the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB). NAESB's standards (1) revise its Open Access Same-Time Information Systems (OASIS) business practice standards, (2) revise four business practice standards relating to reliability issues, (3) add new standards on transmission loading relief for the Eastern Interconnection, (4) add new standards for public key infrastructure, and (5) add a new OASIS implementation guide.
	  • Incorporating these revised standards will provide customers with information that will enable them to obtain transmission service on a non-discriminatory basis and will assist the Commission in supporting needed infrastructure and the reliability of the interstate transmission grid.
	  • According to FERC, incorporation of these standards in its own regulations is appropriate because these standards were approved by NAESB under that organization's consensus procedures, which "helps ensure the reasonableness of the standards by requiring that the standards draw support from a broad spectrum of all segments of the industry."
	  • The commission reiterated that the stakeholder process used by NAESB ensures an industry consensus before any standard is approved, and explained that to the extent implementation of certain standards will result in substantial compliance costs for small-industry participants, they are free to request a waiver of these standards.
	  • As for specific concerns raised regarding the workability of some of the standards, the commission noted that parties are free to petition NAESB to modify those standards through its consensus process.
	  • Moreover, addressing differences in definitions in a few of NERC's and NAESB's standards, FERC praised the two agencies for agreeing to establish a subcommittee to ensure that their definitions are consistent, and incorporated the standards at issue nonetheless "since all industry segments indicate that any existing differences in terms … will not affect reliability or the ability to implement these standards."
	• The order directed public utilities to modify their open-access transmission tariffs to include the new standards the next time they make any unrelated filing to revise their OATTs. The final rule is considered effective 30 days after publication in the Federal Register (has not happened yet).
	• The standards incorporated by reference in the final rule must be implemented by October 1, 2008, with the following exceptions: (1) The reliability related standards (WEQ-004 Coordinate Interchange, WEQ-005 Area Control Error (ACE) Equation Special Cases, WEQ-006 Manual Time Error, WEQ-007 Inadvertent Interchange Payback, and WEQ-008 Transmission Loading Relief - Eastern Interconnection) are required to be implemented by the later of the effective date of the Final Rule in RM08-7-000 or the effective date of this Final Rule; (2) WEQ-001 OASIS Standards are required to be implemented by January 31, 2009; and (3) Appendix D to the WEQ-008 Transmission Loading Relief - Eastern Interconnection standards need not be implemented until NERC completes the field testing.

FERC Order No. 712:	• FERC issued the final rule on Order No. 712 (Docket No. RM08-1-000) on June 19, 2008. In its summary, the Commission changed its regulations governing interstate natural gas pipelines to reflect changes in the market for short-term transportation services on pipelines and to improve the efficiency of the Commission's capacity release program. Market based pricing for short-term capacity releases and facilitation of asset management arrangements by relaxing the prohibition on tying and on its bidding requirements for certain capacity releases is addressed in the order. There was a clarification that the prohibition on tying does not apply to conditions associated with gas inventory held in storage for releases of firm storage capacity. The prohibition on tying and bidding requirements for capacity releases made as part of state-approved retail open access programs is waived in this order. • This order grants flexibility to those entities holding firm transportation and participating in the capacity release market. The modifications to the rules concerning the release of capacity by firm shippers on interstate pipelines is made to enhance the efficiency and effectiveness of the secondary capacity release market and introduce flexibility into the market by providing incentives for releasing capacity. • This order also supports implementation of Asset Management Agreements (AMA), in which capacity holders release their capacity to asset managers (generally marketers) that have greater expertise in maximizing the value

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EFFORT	NOTES

	of pipeline capacity and negotiating beneficial transactions in the gas commodity markets. AMAs maximize the utilization and value of capacity by creating a mechanism for capacity holders to use third party experts to both (1) manage their gas supply arrangements and (2) use that capacity to make gas sales or re-releases of the capacity to others when the capacity is not needed to serve the releasing shipper. AMAs result in ultimate savings for end-use customers by providing for lower gas supply costs and more efficient use of the pipeline grid.
	• Revisions include:
	  • Removing the price ceiling on short-term capacity releases.
	  • Accommodating AMAs, a relatively recent development in the industry.
	  • Allowing a releasing shipper to include conditions in a release concerning the sale/and repurchase of gas in storage inventory, even outside the AMA context
	  • Extending the blanket exemptions from the prohibition against tying and from bidding granted to AMAs to capacity releases made to a marketer participating in a state approved retail access program, finding that such programs provide benefits similar to AMAs.
	• NAESB gas standards supportive of the capacity release program are being reviewed and modified to support the order.
	• The regulatory changes in this rule will become effective as of the effective date of the rule, at which time parties may act in accordance with the revised regulations adopted by this rule. Pipelines must file within 180 days of the effective date of this rule to remove any inconsistent tariff provisions and can incorporate this filing into any other tariff filing made by the pipeline within the 180 day period.
	• The effective date of the rule is 30 days from publishing in the Federal Register.

DSM/EE:	• There is a two-pronged approach to the development of standards. The wholesale market standards are being drafted by the ISOs and RTOs. More than 40 distinct demand response programs in effect to date have been described and the commonalities and best practices related to the measurement and verification (M&V) are being extracted to formulate NAESB business practices. An update will be given on July 30 with draft standards provided to the subcommittee for its consideration on September 30. • The retail market standards are being drafted by a group of utilities who are administering DR programs now. The effort underway by the wholesale group is being reviewed against programs in place by several utilities to begin drafting the retail standards that show coordination between the two markets. Those utilities not in an ISO footprint are also showing remarkable similarities to the wholesale programs for M&V aspects of DR programs. The retail group is running about a quarter behind the wholesale group. • Conversations have been held with FERC to ensure that we are coordinating our efforts with the work underway by FERC to respond to the Congressional request for a state-by-state assessment of demand response to be completed in June 2009. The draft will be out in March with comments due in April. One year later, FERC will develop a national action plan for DR, and by December of 2010 will submit an implementation proposal. • NERC is now considering DR as a critical component of reliability and is in the process of developing a survey for completion by the end of the year. NAESB is participating in the meetings. • NAESB has completed drafting the changes for the specific inclusion of demand resources as part of ancillary services in WEQ-001, as noted by Commissioner Wellinghoff. The draft standards are out for comment now and should be considered by the Executive Committee in August.
Coordination with NERC:	• Glossary: NERC and NAESB will be reviewing procedures to determine how best to coordinate development of definitions and ensure that there are no inconsistencies. It is important in doing so that the flexibility of each organization in meeting deadlines in not compromised such that an overly proscriptive procedure inhibits the leadership of each group. • DSM-EE: NERC and NAESB are participating in each other's development efforts on demand response - standards for NAESB and a survey for NERC. • Order 890: NERC and NAESB continue to work together and hold joint development sessions for ATC standards.

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eTariff:	• NAESB filed eTariff standards with FERC in April. The standards have not yet been the subject of a FERC issuance. • We have discussed holding working sessions on the standards and implementation with FERC staff, and should roll out a schedule for at least 3 sessions shortly. All interested parties will be welcome to attend.
Efforts with Government Agencies and Energy Groups:	• We were recently approached by the GAO to discuss gas imbalance standards and contractual terms as they may apply to the MMS. • NAESB through Rae McQuade was asked to join the National Petroleum Council – a group advising the Secretary of Energy on petroleum and natural gas issues.
Other Related Meetings:	• DSM/EE Meeting: October 3, 2008 • NAESB Board Meeting – September 25, Houston.

NORTH AMERICAN ENERGY STANDARDS BOARD
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Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 890, our subcommittees have accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one balloting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

August 14, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**WEQ EC Ad Hoc Group formed 5-13-08**
Request No.:	**2008 WEQ Annual Plan Item 2.~~b.v.2 (2)~~c**
Request Title:	**Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards – ATC Related Information List**

1. RECOMMENDED ACTION:

_X_ Accept as requested
___ Accept as modified below
___ Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

_X_ Change to Existing Practice
____ Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
_X_ Initiation	_X_ Initiation
___ Modification	___ Modification
___ Interpretation	___ Interpretation
___ Withdrawal	___ Withdrawal
___ Principle	___ Principle
___ Definition	___ Definition
_X_ Business Practice Standard	_X_ Business Practice Standard
___ Document	___ Document
___ Data Element	___ Data Element
___ Code Value	___ Code Value
___ X12 Implementation Guide	___ X12 Implementation Guide
___ Business Process Documentation	___ Business Process Documentation

3. RECOMMENDATION

BACKGROUND: The Joint ESS/ITS and BPS subcommittee reviewed the 2008 WEQ Annual Plan Item 2.~~b.v.2~~c: ~~–~~Develop version 1 business practice standards to support transparency reporting and related functions that may be required as a result of the final order.

~~Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards including any OASIS posting requirements to achieve the data exchange.~~

~~The business practices developed to address this item will require no coordination with the NERC Order 890 reliability standards development.~~

Upon review of this annual plan item and the requirements developed by NERC under MOD-001, MOD-004, MOD-008, MOD028, MOD-029, and MOD-030 the joint subcomittee is recommending no NAESB Business Practice Standards be developed for this annual plan item. The joint subcommittee has opted to take no action on this annual plan item, as the data exchange requirements have been addressed in the NERC standards. Members of the NERC ATC Drafting Team agreed with this action. This position was supported by the WEQ EC on May 13 through a simple majority vote to support no changes (2008 WEQ Annual Plan Item 2.b.v.2). In doing so, on May 13, 2008, the WEQ Executive Committee formed an ad

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hoc group to consider the need for a list of publicly available and not publicly available ATC/TTC related information.

SUMMARY:

The WEQ EC ad hoc group met on June 6, 2008 and determined to pursue the list, not through the proscriptive means of detailing each piece of information that should be made available or not made available publicly, and then uniformly apply such requirements to all transmission providers. Instead the group determined to pursue the list through a standardized report that the TPs would post on OASIS. The report would be standardized, and each TP would complete the report specific to its own operations, and would maintain the currency of the information posted. In this approach, the TPs would not have a "one size fits all" approach to the information to be made public or to remain not-public, and the market participants would have access through a standardized report to the TPs decisions on acess to ATC related information. The ad hoc group met also on July 18 and August 14, 2008 to finalize this approach and draft the needed business practices.

RECOMMENDED STANDARD:

NOTE: NAESB Staff will assign appropriate enumeration to this standard to replac "n" with next sequential standard number within WEQ-001

WEQ-001.n Each Transmission Provider (TP) shall prepare a report according to the format given herein,completing columns ~~–~~and will post such report on OASIS in accordance with WEQ-001.n.1.5 Report on the List of ATC Related Information Report[1] ~~for public access and download~~.

LIST OF ATC RELATED INFORMATION

This List identifies the data associated with ATC calculations, as addressed in NERC ATC Standards (MOD - 001, MOD – 004, MOD – 008, MOD – 028, MOD – 029 and MOD – 030). The Transmission Provider shall indicate whether or not the data will be publicly available.

This standard and table address the provision of ATC-related data to the industry at large, while the NERC MOD standards address the exchange of data amongst those entities that require the data for reliability purposes. Compliance with the NERC MOD standards should not imply compliance with the NAESB standard or vice versa. Nor should non-compliance with the NERC standards imply non-compliance with the NAESB standards or vice versa.

[1] ~~This standard and table address the provision of ATC-related data to the industry at large, while the NERC MOD standards address the exchange of data amongst those entities that require the data for reliability purposes. Compliance with the NERC MOD standards should not imply compliance with the NAESB standard or vice versa. Nor should non-compliance with the NERC standards imply non-compliance with the NAESB standards or vice versa.~~ 2008 WEQ Annual Plan Item 2.b.vii Final Action: http://naesb.org/member_login_form.asp?doc=fa_2008_weq_api_2bvii.doc

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Request Title: **Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards – ATC Related Information List**

Item #	NERC Reference	ATC-Related Item[2]	~~Publicly~~ Available[3,2]	Comments[4,3]
1	MOD-001	The Available Transfer Capability Implementation Document (ATCID) to include the following: How the methodology has been implemented How counterflows are accounted for: - How confirmed transmission reservations, expected Interchange, and internal counterflow are addressed, including rationale for that accounting A description of the allocation processes listed below that are applicable to the Transmission Service Provider: – Processes used to allocate transfer or Flowgate capability among multiple lines or sub-paths within a larger ATC Path or Flowgate. – Processes used to allocate transfer or Flowgate capabilities among multiple owners or users of an ATC Path or Flowgate. – Processes used to allocate transfer or		

[2] The Transmission Provider should enter a response of "Yes" or "No" for each data element.
[3] All "No" responses should contain a reason in the Comment field.
Potential "No" Comments:
a. Market Sensitive Information
b. CEII Information
c. Security Sensitive Information
d. Reliability Sensitive Information
e. Data not created by the Transmission Provider but provided to the Transmission Provider from xxx (include entity identity of information provider)
f. Data not utilized by the Transmission Provider~~, as it is not a requirement of the methodology utilized for ATC/AFC calculations as identified in the ATCID.~~

Potential "Yes" Comments:
a. Available on OASIS
b. Available upon request (in the electronic format in which it was created along with any necessary decoding instructions)
c. Available upon request (in the electronic format in which it was created along with any necessary decoding instructions) but may be subject to a confidentiality agreement

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Item #	NERC Reference	ATC-Related Item[2]	~~Publicly~~ Available[32]	Comments[43]
		Flowgate capabilities between Transmission Service Providers to address issues such as forward looking congestion management or seams coordination A description of how partial period outages or outages from other providers that cannot be directly mapped are handled		
2	MOD-001	Expected generation outages		
3	MOD-001	Expected generation additions		
4	MOD-001	Expected generation retirements		
5	MOD-001	Expected Transmission outages		
6	MOD-001	Expected Transmission additions		
7	MOD-001	Expected Transmission retirements		
8	MOD-001	Load forecasts		
~~10~~9	MOD-001	Unit commitments and order of dispatch, to include all designated network resources and other resources that are committed or have the legal obligation to run, as they are expected to run, in one of the following formats chosen by the data provider: - Dispatch Order - Participation Factors - Block Dispatch		
~~11~~10	MOD-001	Aggregated firm capacity set-aside for Network Integration Transmission Service		
~~12~~11	MOD-001	Aggregated non-firm capacity set-aside for Network Integration Transmission Service (i.e., Secondary Service)		
~~13~~12	MOD-001	Firm Transmission reservations		
~~14~~13	MOD-001	Non-firm Transmission reservations		
~~15~~14	MOD-001	Aggregated capacity set-aside for Grandfathered obligations		
~~16~~15	MOD-001	Firm roll-over rights		

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Request Title: **Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards – ATC Related Information List**

Item #	NERC Reference	ATC-Related Item[2]	~~Publicly~~ Available[32]	Comments[43]
~~17~~16	MOD-001	Any firm adjustments applied by the Transmission Service Provider to reflect parallel path impacts		
~~18~~17	MOD-001	Any non-firm adjustments applied by the Transmission Service Provider to reflect parallel path impacts		
~~19~~18	MOD-001	Power flow models and underlying assumptions		
~~20~~19	MOD-001	Contingencies, provided in one or more of the following formats: – A list of Elements – A list of Flowgates – A set of selection criteria that can be applied to the Transmission model used by the Transmission Operator and/or Transmission Service Provider		
~~21~~20	MOD-001	Facility Ratings		
~~22~~21	MOD-001	Any other services that impact Existing Transmission Commitments (ETCs)		
~~23~~22	MOD-001	Values of Capacity Benefit Margin (CBM), Transmission Reliability Margin (TRM) for all ATC Paths or Flowgates		
~~24~~23	MOD-001	Values of Total Flowgate Capability (TFC) and (AFC) for any Flowgates considered by the Transmission Service Provider selling the Transmission Service		
~~25~~24	MOD-001	Values of Total Transfer Capability (TTC) and Available Transfer Capability (ATC) for all ATC Paths or Flowgates		
~~26~~25	MOD-001	Source and sink identification and mapping to the model		
~~27~~26	MOD004	The Capacity Benefit Margin Implementation Document (CBMID) including the procedures and assumptions for establishing CBM for each ATC Path or Flowgate		
~~28~~27	MOD 004	The amount of CBM set aside for Load-Serving Entities and Resource Planners over each ATC Path or Flowgate		
28	MOD 004	Applicable supporting data, including any models, used for determining CBM or allocating CBM over each ATC Path or		

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Item #	NERC Reference	ATC-Related Item[2]	~~Publicly~~ Available[32]	Comments[43]
		Flowgate		
~~30~~29	MOD 008	The Transmission Reliability Margin Implementation Document (TRMID), including a list of the components of uncertainty used in calculating TRM for each ATC Path or Flowgage and a description of how the component is used and of the method used to allocate TRM across ATC Paths or Flowgates.		
~~31~~30	MOD 028	Each Transmission Service Provider shall include in its ATCID, at a minimum, the following information relative to its methodology for determining TTC: – Information describing how the selected methodology has been implemented – A description of the manner in which the Transmission Operator will account for Interchange Schedules in the calculation of TTC – Any contractual obligations for allocation of TTC – A description of the manner in which Contingencies are identified for use in the TTC process – The following information on how source and sink for transmission service is accounted for in ATC calculations including: a. Define if the source used for ATC calculations is obtained from the source field or the POR field of the transmission reservation b. Define if the sink used for ATC calculations is obtained from the sink field or the POD field of the transmission reservation c. The source/sink or POR/POD identification and mapping to the model d. If the Transmission Service Provider's ATC calculation process		

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Item #	NERC Reference	ATC-Related Item[2]	~~Publicly~~ Available[32]	Comments[43]
		involves a grouping of generation, the ATCID must identify how these generators participate in the group		
~~32~~31	MOD 029	The TTC study report documenting the assumptions used and steps taken in determining the current value for TTC for that ATC Path.		
~~33~~32	MOD 029	The firm capacity set aside for Native Load commitments, including losses and native load growth		
~~34~~33	MOD 030	The Transmission Service Provider shall include in its ATCID: – The criteria used by the Transmission Operator to identify sets of Transmission Facilities as Flowgates that are to be considered in Available Flowgate Capability (AFC) calculations – The following information on how source and sink for transmission service is accounted for in AFC calculations including: a. Define if the source used for AFC calculations is obtained from the source field or the Point of Receipt (POR) field of the transmission reservation. b. Define if the sink used for AFC calculations is obtained from the sink field or the Point of Delivery (POD) field of the transmission reservation c. The souce/sink or POR/POD identification and mapping to the model If the Transmission Service Provider's AFC calculation process involves a grouping of generators, the ATCID must identify how these generators participate in the group		

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Item #	NERC Reference	ATC-Related Item[2]	~~Publicly~~ Available[32]	Comments[43]
~~35~~34	MOD 030	*Regarding the firm and non-firm ETC calculations, identify the elements of the calculation as follows:* – The impact of firm and non-firm NITS including the impacts of generation to load and based on the load forecast including native load and network service load and unit commitment and dispatch order as specified in the ATCID for the TSPs area. – The impact of firm or non-firm NITS including the impacts of generation to load for the areas of adjacent TSPs and any other TSPs with coordination agreements where the distribution factor is equal to or greater than DF%, where DF% is the percentage distribution factor used to determine which are included in the AFC analysis for ETC calculations. – The impact of confirmed firm and non-firm point-to-point service for the TSPs area, expected to be scheduled including roll-over rights – The impact of confirmed firm and non-firm point-to-point service for the TSPs area, expected to be scheduled with duplicate impacts eliminated, including roll-over rights using service from multiple TSPs for the areas of adjacent TSPs and any other TSPs with coordination agreements where the distribution factor is equal to or greater than DF%, where DF% is the percentage distribution factor used to determine which are included in the AFC analysis for ETC calculations. – The impact of any firm or non-firm Grandfathered obligations, expected to be scheduled or expected to flow in the TSPs area.		

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Item #	NERC Reference	ATC-Related Item[2]	~~Publicly~~ Available[32]	Comments[43]
		– The impact of any firm or non-firm Grandfathered obligations, expected to be scheduled or expected to flow for the areas of adjacent TSPs and any other TSPs with Coordination Agreements where the distribution factor is equal to or greater than DF%, where DF% is the percentage distribution factor used to determine which are included in the AFC analysis for ET C calculations. – The impact of any firm or non-firm Other Services as determined by the TSP		

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Item #	NERC Reference	ATC-Related Item[2]	~~Publicly~~ Available[32]	Comments[43]
	~~Order 890A par 148~~	~~In Order No. 890, the Commission required transmission providers to make available, upon request, all data used to calculate ATC, TTC, CBM and TRM for any constrained posted path. Specifically, we expect transmission providers to make available, upon request and subject to appropriate confidentiality protections and CEII requirements, the following modeling data:~~ ~~(1) load flow base cases and generation dispatch methodology;~~ ~~(2) contingency, subsystem, monitoring, change files and accompanying auxiliary files;~~ ~~(3) transient and dynamic stability simulation data and reports on flowgates which are not thermally limited;~~ ~~(4) list of transactions used to update the base case for transmission service request study;~~ ~~(5) special protection systems and operating guides, and specific description as to how they are modeled;~~ ~~(6) model configuration settings;~~ ~~(7) dates and capacities of new and retiring generation;~~ ~~(8) new and retired generation included in the model for future years;~~ ~~(9) production cost models (including assumptions, settings, study results, input data, etc.), subject to reasonable and applicable generator confidentiality limitations;~~ ~~(10) searchable transmission maps, including PowerWorld or PSSE diagrams;~~ ~~(11) OASIS names to Common Names table and PTI bus numbers; and,~~ ~~(12) flowgate and interface limits including limit category (thermal, steady state or transient, voltage or angular).~~		

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Modifications to WEQ-001 (Revisions noted with redlines)

Additions to WEQ-001-n.1.5:

001-n.1.5 ATC INFORMATION LINK

If the Transmission Provider does not use CBM or TRM in their assessment of ATC, that information shall be found in the CBM Implementation Document – CBMID or TRM Inplementation Document – TRMID link below.

The information posted at "ATC Information" should include the following links (as applicable to the Transmission Provider's methodologies):

- Available Transfer Capability Implementation Document - ATCID (as specified in NERC [MOD-001-?])
- CBM Implementation Document - CBMID (as specified in NERC [MOD-004-?])
- TRM Implementation Document - TRMID (as specified in NERC [MOD-008-?])
- ATC Methodology Contact (as required by WEQ-001-xx)
- Report on the List of ATC Related Information Report (as required by WEQ-001-n)

The posting of this information would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns. Any section that has been redacted shall retain the heading and will include the reason for the redaction. Appropriate reasons for redaction are: "Market Sensitive Information", "CEII Information", "Security Sensitive Information" or "Reliability Sensitive Information".

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to ATC Information. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the ATC Information Link above may require the user to register with the individual OASIS sites according to WEQ-002-3.1.

August 14, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**WEQ EC Ad Hoc Group formed 5-13-08**
Request No.:	**2008 WEQ Annual Plan Item 2.~~b.v.2 (2)~~c**
Request Title:	**Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards – ATC Related Information List**

4. SUPPORTING DOCUMENTATION

a. Description of Request:

The request can be inferred from the FERC Order No. 890 and 890-A requirements for transparency of ATC/TTC related information. A recitation of the relevant cites from the orders can be found at the following link: http://www.naesb.org/pdf3/weq_ec_atc060608w1.doc.

b. Description of Recommendation:

The recommendation provides a reporting tool to aid in transparency as referenced in FERC Order Nos. 890 and 890-A. It identifies the information for which each Transmission Provider (TP) will designate the access as public or non-public with reasons given for the access designation.

c. Business Purpose:

The purpose served by providing the report is market transparency. In provideing the report, the market participants can easily idntify which ATC related information is publicly available versus that information that requires restricted or no access.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Joint BPS & ESS/ITS Draft Meeting Minutes March 10-13, 2008:
http://naesb.org/pdf3/weq_atc_afc031008fm.doc ~~Add Link~~

ATC-AFC Motions (from March 10-13, 2008 meeting):
http://naesb.org/pdf3/weq_atc_afc031008a8.doc

WEQ EC Meeting 5-13-08: http://naesb.org/pdf3/weq_ec051308dm.doc

WEQ EC Ad Hoc group Meeting 6-6-08: **Add Link**

WEQ EC Ad Hoc group Meeting 7-18-08: **Add Link**

WEQ EC Ad Hoc group Meeting 8-14-08: **Add Link**