

TO: WEQ Leadership Team
FROM: Ed Skiba and Denise Rager
DATE: December 1, 2007
RE: WEQ Business Practice Standards Consistency Recommendations

At the September 26, 2007 WEQ Leadership meeting, we were requested to look at potential options to improve the consistency of existing business practices and look at ongoing processes, which could facilitate consistency in the ongoing maintenance of existing and development of new business practices. With that directive, we identified three key issues and developed proposed recommendations for the WEQ Leadership consideration. We do not believe the proposed changes conflict with the existing Operating Procedures but rather provide further clarification. Therefore, we do not see a need to modify the existing Operating Procedures.

ISSUE 1 – Consistency in Existing Business Practices

Upon review of the existing business practices there were a number of inconsistencies with what could be considered as boiler plate sections in the business practices. For example, some business practices had Introduction section with text while others had an Introduction section but no text. Some but not all had an Applicability section. One business practice started with a section labeled “Recommended Standard.” Some Business Practices had multiple definition sections.

Recommendation: In the packet is a spreadsheet (attachment 1) that addresses a number of inconsistencies. This includes establishing minimum set sections for all business practices: Introduction, Applicability, and Definition of Terms. A number of the proposed changes to business practices could be addressed as minor corrections while other would require Change Requests which would be sent to the appropriate subcommittee to develop language for the required sections. If the WEQ Leadership is in agreement with these changes we can develop and submit the appropriate minor corrections and change requests to move forward with this recommendation.

ISSUE 2 - Improvements in Development of Recommendations

Upon review of the Final Action Item we found that some of the recommendations which were changes to version 0 Business Practices could not be mapped back to Version 0 as was the case with a re-write of Business Practice WEQ-004 Coordinate Interchange and WEQ-008 Transmission Loading Relief Eastern Interconnection. We also found redlines in the final actions which reflected subcommittee redline changes but not necessarily redline changes against the latest version of the approved standard. For example as a subcommittee was adding text in one meeting and then deleting the same text it appeared in the recommendation as redlines deletes to the approved version of the standard when the text was never included in the business practice.

Recommendation: We are recommending that NAESB keeps working copies of business practices which include the current published version of the business practices and all subsequent Final Actions. When recommendations are posted for formal comments, submitted to the EC and then submitted for member ratifications the next redline changes should be applied to the working copy of the business practice. Additional instructions on what is required when completing a recommendation form will be beneficial in providing consistency and checks to ensure other sections in the business practice or other business practices are not impacted by

the recommendation. To assist in tightening up the Recommendation development process a Recommendation Development Overview document (attachment 2) has been developed. If the WEQ Leadership team is in agreement with the process we'd recommend this write be provided to all committee, subcommittee, and task force chairs/co-chairs as well as being posted on the NAESB Request & Standards Development Activity Applicable to WEQ web page. Additionally, NAESB staff will develop and post a template that will be used when creating new business practices that reflect the minimum requirements for all business practices.

ISSUE 3 – Incorporating Interpretations into Business Practices

Since the WEQ is just now taking its first Interpretation through the approval process, there is no procedure developed as to how interpretations should be included in the WEQ business practices.

Recommendation: After reviewing the WGQ approach for incorporating interpretations into the business practices (all interpretations are documented in one place), we recommend that the interpretations for each business practice be documented within the applicable business practice. This can be accomplished by adding an "INT" to the existing WEQ business practice Optional Number Scheme. The INT section would always be the last section within a business practice and interpretations would be number sequentially in the event there were multiple interpretations for a single business practice.

Recommendation for Consistency of Business Practice Standards

WEQ #	Business Practice	Reference Number	Section Title	Comments	Minor Cor. Chg Rqst.	Action Needed
TOC	Table of Contents			Need to be sure TOC items match business practices		See comments for changing titles under impacted business practice standards.
001	Business Practices for Open Access Same-Time Information Systems (OASIS), Version 1.4		Title	Inconsistent with Table of Contents	MC	Remove Business Practices from title. This causes confusion since the entire booklet is also referenced as Business Practice Standards. This could be done for a minor correction
		None	Introduction	No Text	CR	Add Introduction language for this Business Practice
		New	Applicability		CR	Include Applicability section for this Business Practice
		2.5	Ancillary Services Definitions	Definitions included in later section of document	CR	Move to Definition of Terms section 0. Also delete Heading Ancillary Services Definitions which is not given a section number.
		No Label	Other Service Definitions	Additional definitions included later in document	CR	Move to Definition of Terms section 0. Need Subcommittee determination on whether text under Other Service Definitions not associated to specific definitions should remain in WEQ-001 if so a new section heading and number will need to be assigned.
		2.6	No Title	Additional definitions for Same-Day and Next-Hour	CR	Move to Definition of Terms section 0. Need Subcommittee determination on whether text under Additional Definitions not associated to specific definitions should remain in WEQ-001 if so a new section heading and number will need to be assigned.
002	Business Practices for Open Access Same-Time Information Systems (OASIS) Standards & Communication Protocols Version 1.4		Title	Inconsistent with Table of Contents	MC	Remove Business Practices from title. This causes confusion since the entire booklet is also referenced as Business Practice Standards.
		All		All Sections - Data Values	MC	Consistently display data values as all upper case no single quotes, no double quotes, no equals
		None	Introduction	No Text	CR	Add Introduction language for this Business Practice
		New	Applicability		CR	Include Applicability section for this Business Practice

Recommendation for Consistency of Business Practice Standards

003	Business Practices for Open Access Same-Time Information Systems (OASIS) Data Dictionary Version 1.4	0	Data Dictionary	Inconsistent with Table of Contents	MC	Remove Business Practices from title. This causes confusion since the entire booklet is also referenced as Business Practice Standards.
		New	Introduction		CR	Add Introduction section to this Business Practice Standard
		New	Applicability		CR	Add Applicability section to this Business Practice Standards
004	Coordinate Interchange	None	Purpose		MC	Change section title to Introduction
		004-A	Appendix A	No Title in Appendix Header	MC	Move title to header line.
		004-B	Appendix B	No Title in Appendix Header	MC	Move title to header line.
		004-C	Appendix C	No Title in Appendix Header	MC	Move title to header line.
		004-C	Appendix D	No Title in Appendix Header	MC	Move title to header line.
005	Area Control Error (ACE) Equation Special Cases	None	Purpose		MC	Change section title to Introduction
		005-A	Appendix A	No Title in Appendix Header	MC	Move title to header line.
006	Manual Time Error Correction	None	Purpose		MC	Change section title to Introduction
007	Inadvertent Interchange Payback	None	Purpose		MC	Change section title to Introduction
		007-A	Appendix A	No Title in Appendix Header	MC	Move title to header line.
008	Transmission Loading Relief	None	Purpose			Minor correction change to section title to Introduction
		None	Applicability			
		008-A	Appendix A	No Title in Appendix Header	MC	Move title to header line.
		008-B	Appendix B	No Title in Appendix Header	MC	Move title to header line.
		008-C	Appendix C	No Title in Appendix Header	MC	Move title to header line.
		008-D	Appendix D	No Title in Appendix Header	MC	Move title to header line.
010	Contracts Related Standards	None				Why is this not in the booklet? Need to ask the WEQ leadership if you purchase the standards should you be entitled to the contracts which are referenced in the standards.
011	Gas Electric Coordination	None	Introduction	No Text	CR	Add Introduction language for this Business Practice
		New	Applicability		CR	Include Applicability section for this Business Practice
		0	Definition of Terms	Not in Alphabetical Sequence	MC	All terms should be listed in alphabetical sequence.

Recommendation for Consistency of Business Practice Standards

012	Public Key Infrastructure (PKI)	None	Recommended Standard	Text Included (looks like introduction, recommendation justification and definitions)	CR	Change request to removed upfront sections, move requirements within these sections to Business Requirements, if applicable, and add new sections: Introduction and Applicability. Will also need to look at sections 012-1 Introduction (RFC 3647 Section 1) and 012-1.1 Overview (RFC 3647 Section 1) to see if these need to be incorporated in new Introduction section.
		None	Certification	Text Included (Looks like a requirement rather than up front information)	CR	See Action Needed on Section Title "Recommended Standard."
		None	Scope	Text Included (Text looks like introduction)	CR	See Action Needed on Section Title "Recommended Standard."
		None	Commitment to Open Standards	Text Included (Text is justification for recommendation should consider removing language)	CR	See Action Needed on Section Title "Recommended Standard."
		1	Introduction (RFC 3647 Section 1)		CR	See Action Needed on Section Title "Recommended Standard."
		1.1	Overview (RFC 3647 Section 1)		CR	See Action Needed on Section Title "Recommended Standard."
		None	This document references published works of the Internet Engineering Task Force of The Internet Society	Is this applicable only to WEQ 011 or to the entire document.	MC	Minor Correction to reference WEQ 012 rather than "This document"
013	Business Practices for Open Access Same-Time Information Systems (OASIS) Implementation Guide, Version 1.4		Title	Inconsistent with Table of Contents	MC	Remove Business Practices from title. This causes confusion since the entire booklet is also referenced as Business Practice Standards. This could be done for a minor correction
		New	Applicability		CR	Include Applicability section for this Business Practice
		0	Usage of Terms		MC	Minor Correction to change to Definition of Terms.
		013-4	Example Implementation		CR	Should we consider moving this to an appendix so that if we need to add additional sections to this document they are logically sequential and the examples would all be in one place.

Recommendation for Consistency of Business Practice Standards

Version Notes	Version Notes					Do we ask the leadership group if anything needs documented on the Final actions page to indicate R05009 was not included in the Version 0 standards because it was superseded by R04013A
All	General comments			Data Values	MC	Consistently display data values as all upper case no single quotes, no double quotes, no equals
All	General comments			Standardize section references when referring to a section in another Business Practice Standard	MC	All references to another Business Practice should follow the same format WEQ-xxx-section number section name (ex. ex. See WEQ-013-2.3 Basic OASIS Transaction Handling)
All	General comments			Standardize section references when referring to a section within the current Business Practice Standard	MC	Within a Business Practice references to section should follow the format "section" section number section name (ex. See section 2.3 Basic OASIS Transaction Handling).



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RECOMMENDATION DEVELOPMENT OVERVIEW

1. NAESB will maintain current (working copies) business practices which will include the latest version of business practice including ratified final actions, interpretations and minor corrections.
2. Current (working copies) business practices must be used in creating recommendations.
3. Recommendations with a Recommended Action of Accept as requested or Accept as modified below must contain the following information:
 - a. Recommendation – Both the Summary and Recommended Standards are required
 - i. The summary section must include a list of each section of Business Practice that is being added/changed/deleted via the recommendation. If new sections are being added it is the responsibility of the subcommittee chair/co-chair to work with NAESB staff to determine the appropriate section numbers.
 - ii. Recommendations either via the Recommended Standards or a separate attachment must include redline changes to the sections referenced in the Summary Section. Redlines should be based on the current (working copy) business practice and final recommended changes and should not include interim subcommittee redline changes.
 - b. Supporting Documentation
 - i. Description of Request - Brief description that summarizes the request which generated the recommendation. This section is not required if the recommendation is based on an annual plan item
 - ii. Description of Recommendation – This section is required if the Description of Request is populated and the scope of the recommendation has changed from the original intent of the Request
 - iii. Business Purpose – This section is used to provide input into the reason/justification for the change. This can include items such as references to FERC Orders, Annual Plan Items, etc.
 - iv. Commentary/Rationale of Subcommittee(s)/Task Force: This section is required to provide insight into why the Subcommittee/Task Force developed its recommendation. It is beneficial to include links to meeting minutes, work papers etc, that relate to the request, annual plan item, recommendation.

Note: If a recommendation modifies or deletes a section of a business practice the subcommittee must search the existing standards to determine if the section being modified/deleted is reference in another business practices. The subcommittee may need to modify those business practices where the (modified/deleted) section is referenced as a part of the recommendation.

 - c. If the current (working copy) of the business practice has changed since the recommendation has been approved, which affect the recommendation during the



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formal comment period, the subcommittee should submit formal comments to the EC which have the recommended redlines applied to the current business practice.

- d. Recommendations submitted for membership ratification should always have the recommendation applied to current (working copy) of the business practice.
- e. New Business Practice recommendations must include the following sections:
 - i. Introduction
 - ii. Applicability
 - iii. Definition of Terms
 - iv. Business Practice Requirements

Subcommittees developing new business practices should work with NAESB Staff using Business Practice formats consistent with existing business practices

Level 1 All Caps/Bold Underline

Level 2 All Caps

Level 3 Proper Case Bold Underline

Level 4 Proper Case

Level 5 Proper Case Bold Italics Underline

Level 6 Proper Case Italics

Fonts Arial 11 pt.

Title (Proper Case, Arial 14, Bold)

Introduction (Proper Case, Arial 11, Bold, Underline)

Text (Arial 11)

Applicability (Proper Case, Arial 11, Bold, Underline)

Text (Arial 11)

Definition of Terms (Proper Case, Arial 11, Bold, Underline)

XXX-0.1 **Definition** (Proper Case, Arial 11, Bold, Underline) – Text (Arial 11)

Business Practice Requirements (Proper Case, Arial 11, Bold, Underline)

XXX-1 **LEVEL 1 TITLE** (Upper Case, Arial 11, Bold, Underline)

Text (Arial 11)

XXX-1.1 LEVEL 2 TITLE (Upper Case, Arial 11)

Text (Arial 11)

XXX-1.1.1 **Level 3 Title** (Proper Case, Arial 11, Bold, Underline)

Text (Arial 11)

XXX-1.1.1.1 Level 4 Title (Proper Case, Arial 11)

Text (Arial 11)

XXX-1.1.1.1.1 **Level 5 Title** (Proper Case, Arial 11, Bold, Underline, Italics)

Text (Arial 11)

XXX-1.1.1.1.1.1 *Level 6 Title* (Proper Case, Arial 11, Italics)

Text (Arial 11)

XXX-A Appendix A – Title (Proper Case, Arial 14, Bold)

Text (Arial 11)