

To: Board Certification Program Committee

From: Matthew Goldberg, ISO-NE, WEQ EC Representative
Ed Skiba, MISO, WEQ EC Representative
Cathy Wesley, PJM, WEQ EC Alternate

Re: Request for Informal Comments

Date: May 6, 2011

On April 27, 2011, NAESB posted notice of “[a]n informal comment period to review the WEQ-012 Public Key Infrastructure (PKI) standards and provide comments on requirements for authorized Certificate Authority (CA).” The notice stated that comments would be due on May 6, and that the Board Certification Program would review comments on May 9. In advance of that meeting, we provide the following comments. Based on the April 4, 2011, Board Certification Program Committee, it was our understanding that the Committee was going to seek comments on the Check List for NAESB Wholesale Electric Quadrant (WEQ) Public Key Infrastructure (PKI) Authorized Certification Authorities WEQ-012 prior to its next meeting.

After consultation with NAESB’s Staff Attorney, we understand that the intent of this Informal Comment Period for the Board Certification Program Committee is *not* to provide comment on the *existing* WEQ-012 PKI standards or to comment on how the existing WEQ-012 PKI Standards *might be enhanced*. This seems appropriate, because as we understand, it is not within the NAESB Board’s authority to develop new or enhanced Business Practices. In any event, the NAESB Critical Infrastructure Committee (CIC) has already been asked to provide input on a NAESB Member’s draft Request for Initiation of a NAESB Standard for Electronic Business Transactions or Request for Enhancement of a NAESB Standard for Electronic Business Transactions Request, and did so on April 15. In this regard, we would request that the NAESB Board work to clarify the scopes of the Board Certification Program Committee and the CIC on a forward-looking basis. If the Board Certification Program Committee desires to lend its view that the current NAESB PKI standards should be reviewed or enhanced, such a recommendation should be in the form of a request for a standards development following established NAESB processes and the development of the standard itself assigned to the appropriate committee for prioritization and incorporation in its work plan.

Our understanding is that this comment period is intended to begin discussions on: (a) how and whether NAESB personnel should administer or perform a role of designating companies as WEQ-012 Certificate Authorities; and (b) how and whether NAESB personnel should administer or perform a role of certifying companies as compliant with WEQ-012. As a general matter, it is our understanding that carrying out these functions on a day-to-day basis would not be within the purview of the NAESB Board or of a Board subcommittee. Rather, it is our understanding that the Board Certification Program Committee is providing recommendations for consideration by NAESB management and the NAESB Board on these issues.

More specifically, with regard to the issue of designating companies as WEQ-012 Certificate Authorities, we think a good place to start would be to re-examine the Program Committee’s 2007 Draft Revised Checklist. While this Revised Checklist has not been approved by the Board, given the passage

of time, it would be worthwhile to revisit it and use it as a foundation in the event that any enhancements consistent with WEQ-012 are desired.

With regard to the issue of certifying companies as compliant with WEQ-012, our initial thoughts are that we would support NAESB personnel utilizing a Third-Party to conduct audits of each entity claiming WEQ-012 Certified CA status and requiring each WEQ-012 Certified CA to maintain an audit certificate.