

NORTH AMERICAN ENERGY STANDARDS BOARD

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> December 18, 2014 Filed Electronically

The Honorable Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street N.E., Room 1A Washington, D.C. 20426

RE: NAESB Status Report on Modifications to Support FERC Order No. 676-H, *Standards for Business Practices and Communication Protocols for Public Utilities* (Docket No. RM05-5-022)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") voluntarily submits this report in response to the September 18, 2014 FERC Order No. 676-H *Standards for Business Practices and Communication Protocols for Public Utilities* issued by the Federal Energy Regulatory Commission ("FERC" or "Commission") in Docket RM05-5-022 concerning the NAESB Version 003 Wholesale Electric Quadrant ("WEQ") Business Practice Standards. The report is intended to respond to specific Commission direction regarding modifications to WEQ-001-9.5, WEQ-001-10.5 and related standards and serves to provide the Commission with an update concerning the standards development effort given priority status by the Commission. This report is submitted for informational purposes only.

The cover letter, report and enclosures are being filed electronically in Adobe Acrobat[®] Portable Document Format (.pdf), with each enclosure bookmarked separately. The entire filing is also available on the NAESB web site (<u>www.naesb.org</u>). Please feel free to call the office at (713) 356-0060 or refer to the NAESB website (<u>www.naesb.org</u>) should you have any questions or need additional information regarding the standards development effort.

Respectfully submitted,

Rae McQuade

Ms. Rae McQuade President & COO, North American Energy Standards Board



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cc without enclosures:	Chairman, Cheryl LaFleur, Federal Energy Regulatory Commission Commissioner, Tony Clark, Federal Energy Regulatory Commission Commissioner Philip D. Moeller, Federal Energy Regulatory Commission Commissioner Norman C. Bay, Federal Energy Regulatory Commission
	Mr. Michael Bardee, Office of Electric Reliability, Federal Energy Regulatory Commission Mr. David L. Morenoff, General Counsel of the Commission, Federal Energy Regulatory Commission
	 Commission Mr. Michael Goldenberg, Senior Attorney, Office of General Counsel, Federal Energy Regulatory Commission Ms. Jamie Simler, Director, Office of Energy Market Regulation, Federal Energy Regulatory Commission Mr. J. Arnold Quinn, Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission
	Ms. Valerie Crockett, Chairman and CEO, North American Energy Standards Board Mr. Michael Desselle, Vice Chair of the WEQ, North American Energy Standards Board Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Enclosures (all documents and links are available publically on the NAESB website - www.naesb.org)

- Appendix A Links to Meeting Notes and Work Papers
- Appendix B List of Executive Committee Minutes and Available Transcripts
- Appendix C NAESB Process to Develop and Adopt Standards
- Appendix D NAESB 2014 WEQ Annual Plan
- Appendix E NAESB 2015 WEQ Annual Plan

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UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

Standards for Business Practices and) **Communication Protocols for Public Utilities**) **Docket No. RM05-5-022**

In response to FERC Order No. 676-H in Docket No. RM05-5-022,¹ the North American Energy Standards Board (NAESB) is voluntarily submitting this report to inform the Federal Energy Regulatory Commission (FERC or Commission) of the efforts taken to date to modify the NAESB Wholesale Electric Quadrant (WEQ) Business Practice Standards WEQ-001-9.5, WEQ-001-10.5, and any related standards to conform to the Dynegy policy,² as reiterated in Entergy Services, Inc. and FERC Order No. 676-H.³ The NAESB WEQ Open Access Same-time Information System (OASIS) Subcommittee has been tasked with drafting a recommendation containing modifications to the NAESB WEQ Business Practice Standards to support the Dynegy policy concerning when a transmission customer loses transmission rights to its parent reservation after the submission of a redirect request. The purpose of this status report is to inform the Commission of the actions taken by the NAESB WEQ Executive Committee and the progress of the modification efforts by the WEQ OASIS Subcommittee, as the effort was given priority status by the Commission in the final order. This report is informational only and action by the Commission is not expected at this time. The recommendation containing revisions to NAESB Business Practice Standards WEQ-001-9.5, WEQ-001-10.5, and the related standards is expected to be complete within the second quarter of 2015. Upon approval, NAESB will submit a report to the Commission containing the modified business practice standards.

On September 18, 2012, NAESB submitted a filing to the Commission that detailed its activities from February 29, 2009 to July 2012 with respect to Version 003 of the NAESB WEO Business Practice Standards.⁴ A subsequent errata notice was submitted on December 20, 2012.⁵ On July 18, 2013, the FERC Notice of Proposed

¹ Standards for Business Practices and Communication Protocols for Public Utilities, Order No. 676-H, 79 FR 56939 (Sept.24, 2014), 148 FERC ¶61, 205 (Sept. 18, 2014) (Order No. 676-H). ² Dynegy Power Mktg., Inc., 99 FERC ¶ 61,054 at P 9 (2002) (Dynegy).

³ Entergy Services, Inc., 137 FERC ¶ 61,199 (2011), order on reh'g, 143 FERC ¶ 61,143 (2013), order on reh'g, 148 FERC ¶ 61,209 (2014).

⁴ The September 18, 2012 NAESB Report to FERC, Standards for Business Practices of Public Utilities, is available in Docket No. RM05-5 et al and at the following link: https://www.naesb.org/pdf4/ferc_091812_weq_version003_report.pdf

⁵ The December 20, 2012 NAESB Errata Notice to FERC, Standards for Business Practices and Communication Protocols for Public Utilities, is available in Docket Nos. RM05-5-000 and RM05-5-022 and at the following link: https://www.naesb.org/pdf4/ferc122012_weq_version003_errata.pdf.

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Rulemaking (NOPR) on Standards for Business Practices and Communication Protocols for Public Utilities⁶ was issued and proposed the adoption of the Version 003 NAESB Business Practice Standards with certain exceptions. This action was followed by the September 18, 2014 issuance of FERC Order No. 676-H. In the final order, the Commission declined to incorporate WEQ-001-9.5 and WEQ-001-10.5 and requested that NAESB revise the Business Practice Standards and any other related standards that are impacted to bring them into conformance with the Dynegy policy. The Commission also asked that NAESB make this project a priority over other WEQ standards development projects.⁷ The *Dynegy* policy, as reiterated in FERC Order No. 676-H, states "a transmission customer does not lose its rights to its original path until the redirect request satisfies all of the following criteria: (1) it is accepted by the Transmission Provider; (2) it is confirmed by the transmission customer; and (3) it passes the conditional reservation deadline under section 13.2."8 The current NAESB Business Practice Standard WEQ-001-9.5 provides that the amount of capacity available to redirect could be reduced before the redirect has passed the conditional reservation deadline as set forth in Section 13.2 of the Pro Forma Open Access Transmission Tariff (OATT).9 NAESB Business Practice Standard WEQ-001-10.5 allows the capacity available for a redirect to be reduced when the request for a firm redirect is confirmed, rather than unconditional.¹⁰

In the final order, the Commission explained that NAESB Business Practice Standard WEQ-001-9.5 does not support the *Dynegy* policy concerning when a transmission customer loses its rights to its original path after the submission of a redirect request. The order declined to incorporate the standard by reference into the Commission's regulations and reasoned that "reducing the capacity available to redirect prior to the passage of the conditional reservation deadline could lead to a customer paying firm transmission charges and losing capacity on both its original path and its redirect path."¹¹ The Commission further explained that the Dynegy policy "effects a reasonable balancing of interests between the customer and the transmission owner by ensuring that the customer does not potentially lose rights to capacity, while at the same time still permitting the transmission owner to sell available capacity on a short term basis until the redirect becomes unconditional."¹² The Commission also declined to incorporate by reference NAESB Business Practice Standard WEQ-001-10.5, as the language of the standard allows for the redirect to be reduced when confirmed "which precedes expiration of the conditional reservation deadline."13

During the October 21, 2014 meeting, the WEQ Executive Committee reviewed FERC Order No. 676-H and the NAESB 2014 and 2015 WEQ Annual Plans. At that time, the WEQ OASIS Subcommittee was continuing the development of preemption and competition standards (2014 Annual Plan Items 2.a.i.1-2 and 5.c) to support FERC Order No. 890 with an expected completion date falling within the fourth quarter of 2014. Given the

¹² Id.

¹³ Id at P 48.

⁶ Standards for Business Practices and Communication Protocols for Public Utilities, Notice of Proposed Rulemaking, 78 FR 45,096 (July 26, 2013), FERC Stats. & Regs. ¶ 32,698 (July 18, 2013).

Order No. 676-H at P 49.

⁸ Id at P 46 (quoting Dynegy at P 9).

⁹ *Id* at P 47.

¹⁰ Id at P 49. ¹¹ Id at P 47.

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Commission's request to prioritize the revisions to WEQ-001-9.5, WEQ-001-10.5, and related standards, the WEQ Executive Committee directed the WEQ OASIS Subcommittee to halt work on the development of the preemption and competition standards and to immediately focus its efforts on the stated Order No. 676-H revisions related to the *Dynegy* policy. As a consequence, the WEQ Executive Committee extended the completion date for the preemption and competition standards through 2015 and requested that the WEQ OASIS Subcommittee resume work on the standards development project upon completion of the stated priority modifications to support FERC Order No. 676-H.

The WEQ OASIS Subcommittee immediately responded to the Executive Committee directions and met on October 22-23, 2014 to address the revisions needed to support the priority modifications to support the Dynegy policy. The participants in the subcommittee determined that several related standards will also be affected by the modifications to WEQ-001-9.5 and WEQ-001-10.5, including the standards that support Network Integration Transmission Service (NITS), Service Across Multiple Transmission Systems (SAMTS), and standards in development to support preemption and competition. Also during the October meeting, the subcommittee identified potential issues posed by the Dynegy policy and began developing a work paper that considers four categorized scenarios: (1) firm redirects from an unconditional parent reservation; (2) firm redirects from a conditional parent reservation; (3) firm redirects from a resale; and (4) redirects on a non-firm basis. Over the course of two subsequent face-to-face meetings and two conference calls, the subcommittee documented its discussion on the topics of reservation priority, at what point the redirect becomes unconditional, when the reservation capacity is released from the parent, Available Transfer Capability (ATC) calculation impacts, and preemption expectations as they relate to the four scenarios described in the work paper developed during the first meeting. A second work paper was also created to track the consideration and outcomes of motions, assignments to individual participants, and general issues of consensus reached among participants during the project. The two work papers are updated during subcommittee meetings and conference calls and posted to the NAESB website at the end of each meeting. To date, the subcommittee has identified fifteen issues for consideration moving forward and has voted on two individual motions. The WEQ OASIS co-chairs reported to the WEQ Executive Committee leadership that the draft recommendation for the modifications is anticipated to be voted out of the subcommittee during the second quarter of 2015. The co-chairs noted that the expected timeline for the project is based upon the large number of standards that are impacted by the modifications. Based upon a review by the OASIS co-chairs and WEQ Executive Committee leadership, a minimum of 26 standards are likely to be impacted.

The WEQ OASIS Subcommittee is currently debating questions that may help to illustrate the landscape of standards that could be affected by the Commission's directive. For example, the subcommittee is currently assessing whether firm redirects from conditional parent reservations should be required to be permitted under the *Dynegy* policy. This is a key issue as the subcommittee is considering the development of a recommendation containing standards language that would not allow for redirects of capacity where the parent reservation is still subject to preemption. Furthermore, the subcommittee has reasoned that if redirects of short term firm parent

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reservations of a conditional nature are permitted, then the subcommittee must determine whether the preemption of the parent reservation would trigger a preemption of the redirect request as well, due to the lack of short term firm service to redirect. The documentation of the consensus items that were reached by the NAESB WEQ OASIS Subcommittee is provided in a matrix included in this report within Appendix A.

As noted, the expected completion date for the standards development recommendation will fall within the second quarter of 2015. After the recommendation is voted out of the WEQ OASIS Subcommittee, it will be made available for a thirty-day formal industry comment period. The recommendation and comments will then be forwarded to the WEQ Executive Committee, which will consider the recommendation, make any changes it deems necessary, and take a super-majority balanced vote on the final recommendation. In order to expedite the process, the WEQ Executive Committee is prepared to hold a single-topic meeting in order to consider the recommendation of the subcommittee or take any other measures necessary to ensure a timely completion of the project. If approved by the WEQ Executive Committee, the recommendation will be sent out for a 30-day ratification period by the NAESB WEQ membership. If approved, the ratified recommendation will become a final action.

NAESB is committed to working with the industry and the Commission to address these standards modifications as expediently as possible in response to the request of the Commission in the final order. If any delays in the standards development effort occur, NAESB will immediately inform the Commission through an updated status report. NAESB appreciates the opportunity to provide this report to the Commission, and as previously noted, a subsequent report concerning the modifications to WEQ-001-9.5, WEQ-001-10.5, and related standards, will be filed when available.

Attached please find five enclosures supporting this report. Provided in Appendix A are links to meeting notes and work papers for the WEQ OASIS Subcommittee. Provided in Appendix B is a list of WEQ Executive Committee meeting minutes and available transcripts. An overview of the process that NAESB utilizes to develop standards is detailed in Appendix C. Appendix D contains the NAESB 2014 WEQ Annual Plan. Appendix E provides the NAESB 2015 WEQ Annual Plan.

Appendices

Appendices:

- A...... Links to NAESB WEQ Open Access Same-time Information System (OASIS) Subcommittee Meeting Minutes and Work Papers
- B...... List of Executive Committee Minutes and Available Transcripts
- C..... NAESB Process to Develop and Adopt Standards
- D..... NAESB 2014 WEQ Annual Plan
- E NAESB 2015 WEQ Annual Plan

Comments of the North American Energy Standards Board Standards for Business Practices and Communication Protocols for Public Utilities (Docket No. RM05-5-022) December 18, 2014

Appendix A: Links to NAESB WEQ Open Access Same-time Information System (OASIS) Subcommittee Meeting Minutes and Work Paper

Apper	ndix A – NAESB WEQ Open Access Same-time Information System	vstem (OASIS) Subcommittee Meeting Minutes and Work Papers Link	s
Date of Meeting	Meeting Location	Meeting Minutes	Number of Participants
October 2, 2014	WEQ OASIS Subcommittee Conference Call	Meeting Minutes:https://www.naesb.org//pdf4/weq_oasis100214fm.docAttachment:WEQ-001 Document for PR 10/1/14 Redline:https://www.naesb.org//member_login_check.asp?doc=weq_oasis100214a1.docWork Papers:OASIS Subcommittee 2014 Meetings:https://www.naesb.org//pdf4/weq_oasis100214w1.docxPreemption and Competition Parking Lot:https://www.naesb.org//pdf4/weq_oasis100214w2.xlsxStrawman Long-Term Competition 9/17/14:https://www.naesb.org//member_login_check.asp?doc=weq_oasis100214w3.docxTiming Examples 9/18/14:https://www.naesb.org//pdf4/weq_oasis100214w4.docxLong Term Competition 'Timing' 9/17/14:https://www.naesb.org//pdf4/weq_oasis100214w5.docxWEQ 001 Document for P&R 10/1/14:https://www.naesb.org//pdf4/weq_oasis100214w5.docxWEQ 001 Document for P&R 10/1/14:https://www.naesb.org//pdf4/weq_oasis100214w5.docxWEQ 001 Document for P&R 10/1/14:https://www.naesb.org//member_login_check.asp?doc=weq_oasis100214w6.docDefinitions Working Document:https://www.naesb.org//pdf4/weq_oasis100214w7.docx	14

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Appendix A: Links to NAESB WEQ Open Access Same-time Information System (OASIS) Subcommittee Meeting Minutes and Work Paper

Appen	dix A – NAESB WEQ Open Access Same-time Information Sy	stem (OASIS) Subcommittee Meeting Minutes and Work Papers Link	s
Date of Meeting	Meeting Location	Meeting Minutes	Number of Participants
October 22-23, 2014	WEQ OASIS Subcommittee Meeting Richmond, VA	Meeting Minutes: https://www.naesb.org//pdf4/weq_oasis102214dm.docAttachments: Informal Comments Issues and Resolutions for Standard WEQ- 001-20 Redline: 	34

S Comments of the North American Energy Standards Board Standards for Business Practices and Communication Protocols for Public Utilities (Docket No. RM05-5-022) December 18, 2014

Appendix B: Executive Committee Meeting Minutes and Availability of Transcripts

	Appendix B – Executive Committee Meeting Minutes and Availability of Transcripts	
Date	Link to Executive Committee Minutes	Availability of Transcripts ¹
October 21, 2014	NAESB Executive Committee Meetings, Richmond, VA WEQ EC Minutes: <u>https://www.naesb.org/pdf4/weq_ec102114dm.docx</u>	Jill Vaughn, CSR - 281-853-6807

¹ The Federal Energy Regulatory Commission and other regulatory agencies may contact the NAESB office to obtain electronic copies of the transcripts. All others can contact the transcription service and order the transcripts for a nominal fee.

Appendix C: NAESB Process to Develop and Adopt Standards

The NAESB Standards Development Process

NAESB is focused on proposing, considering, and adopting voluntary standards and model business practices that will have a significant and lasting impact on all aspects of the natural gas and electricity marketplaces. As a result of the standards NAESB adopts, it is expected that the industry will operate more efficiently and effectively, benefiting both the industry and its customers. At the same time, it must be acknowledged that NAESB standards may constitute a change in the way parties do business, with an accompanying effect on the use and allocation of resources.

NAESB's policy is to move at a deliberate pace, consistent with its annual plan(s), thus permitting those affected by its standards, especially those standards adopted as regulations by the Federal Energy Regulatory Commission (FERC) or other regulatory bodies, to assimilate them as part of their business practices. To this end, NAESB will carefully consider whether proposed standards are both timely and necessary. In particular, it will try to avoid adopting and implementing new standards, however beneficial, before the industry is able to reasonably make use of them.

The standards development process is governed by the annual plan, and items can be included in the plan or modified only with Board approval. The plan typically reflects requests from NAESB members, government agencies, and other interested parties. In approving the annual plan, the Board considers the availability of resources, including the NAESB budget and staff and the availability of industry volunteers. New requests received throughout the year are either considered part of the existing annual plan or as new items that require Board approval.

The standards development process begins with an annual plan item or a triaged and approved request. Triage is a process used by each quadrant of the Executive Committee (EC) to determine whether a request is within scope, which quadrant(s) it applies to, which subcommittee(s) it should be referred to, and what priority it should be assigned. Triage is carried out by EC members appointed by the EC chair. Triage recommendations are submitted to the en banc EC and require EC approval, and may also require Board approval if there are scope questions or if a modification of the annual plan is required.

Once the triage process is completed, the subcommittees—more than one are normally involved in standards recommendations—review the request, compare it to existing standards, and prepare recommendations that may take the form of new or modified standards or interpretations. Participation in EC subcommittees is open to any interested party regardless of membership status. All subcommittee participants may vote; voting is balanced by segment and quadrant. All votes are public.

When the recommendation is complete, it is made available for a thirty-day industry comment period. The recommendation and comments are then forwarded to the EC, which considers the recommendation, makes any changes it deems necessary, and takes a vote. A recommendation must receive an affirmative vote of at least 67 percent from each applicable quadrant EC and 40 percent from each of the segments of the applicable quadrant(s).

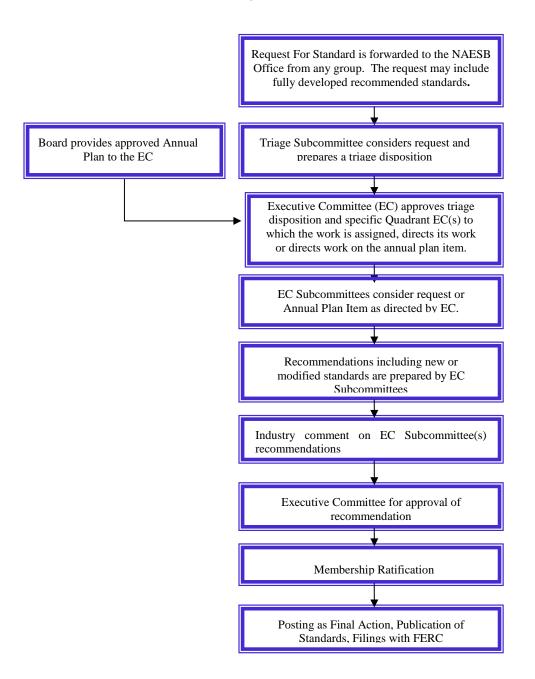
After passage by the EC, the recommendation must be ratified by the NAESB members. An affirmative vote of 67 percent of the members of the applicable quadrant(s) is required for ratification. After ratification, standards and modifications are considered final actions and will be published in the next version of NAESB standards.

All NAESB quadrants follow the same development process described herein. The process has been followed by the WGQ since 1994 and has been used to develop more than five hundred standards that have been incorporated by reference into federal regulations.

Comments of the North American Energy Standards Board Standards for Business Practices and Communication Protocols for Public Utilities (Docket No. RM05-5-022) December 18, 2014

Appendix C: NAESB Process to Develop and Adopt Standards

North American Energy Standards Board Standards Development Process Flow Chart



Appendix C: NAESB Process to Develop and Adopt Standards

Flexibility

NAESB recognizes that flexibility is necessary as standards are developed to address regional concerns or to incorporate variances to accommodate operational or structural differences. Several WEQ standards incorporate regional or operational differences for both Version 0 and Version 1. There is a high threshold for incorporating such variances in a standard; the subcommittee(s) in drafting the standard, the EC in approving the subcommittee recommendation, and the membership in approving the standard must all agree that such variance is necessary. Nonetheless, NAESB procedures are well suited to take into account operational and regional differences.

Transparency

All NAESB meetings are open for attendance and participation by any interested party, with the exception of executive sessions of the Board or Managing Committee for purposes of discussing personnel, compensation or legal issues. Meeting announcements and agendas are posted in advance to permit the widest possible participation. Conference-calling capability is available for all meetings and web casting is available for most. Those intending to attend a meeting in person or by telephone are asked to notify NAESB by a specific date to permit adequate meeting planning.

Transcripts are made of all Board of Directors and EC meetings, and may also be made of other meetings that are expected to be controversial. Transcripts are maintained in the NAESB office and are provided to regulatory agencies for their internal use. All other interested parties can purchase transcripts from the relevant transcription service.

Coordination with NERC

For business practice standards development for the WEQ, if it is determined by NERC and NAESB Executive Management that joint development is needed by NERC and NAESB, the NERC-NAESB Coordination Joint Development Process is implemented.¹ This process requires that the appropriate NAESB Subcommittee and NERC Standards drafting team work together to develop reliability standards and business practices.

The Joint Interface Committee of NAESB, NERC and the ISO-RTO Council ("JIC") was dissolved as part of the agreement to create the Independent Grid Operator segment of the WEQ. The joint development process between NAESB and NERC is being used to ensure appropriate coordination. The ISOs and RTOs have strong decision-making roles in both NERC and NAESB, and thus with the use of the joint development process, the JIC was no longer necessary.

Accessibility of Standards and Work Products

The NAESB standards and protected work products are accessible to members at no cost as a benefit of their membership. Non-members can purchase the standards as a full version, or they can purchase individual final actions. Non-members can also access the standards at no cost by requesting an evaluation copy. NAESB standards and protected work products are copyrighted. Non-members can download a NAESB materials order form from the NAESB web site for ordering standards or for instructions on accessing standards for evaluation.

¹ The NERC-NAESB Coordination Joint Development Process was submitted to the Commission on February 17, 2006 in Attachment C of the Progress Report on NAESB Activities impacting Docket No. RM05-5-000, "Standards for Business Practices and Communication Protocols for Public Utilities": <u>http://www.naesb.org/doc_view2.asp?doc=ferc021706.pdf</u>.

	Item Description	Completion ⁱ	Assignment ⁱⁱ
De	velop business practices standards as needed to complement reliability standards	s	
staı app	velop business practice standards to support and complement NERC reliability standa ndards authorization requests (SARs) using the NERC/NAESB Coordination Joint St propriate. Current NAESB activities underway to develop business practice standards n item are:	andards Develop	pment Process as
a)	Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection – Permanent Solution ¹	TBD	BPS
	Note: Consideration should be given to provisional item 2.a. Work is being coordinated with the IDC Association. Status: Pending EC Action		
b)	Perform consistency review of WEQ-008 Transmission Loading Relief Business Practice Standards and develop recommendation. ² Status: Pending EC Action	TBD	BPS
c)	Disturbance Control Standard (DCS) (BAL-002) Coordination with NERC <u>Project 2010-14.1 Phase 1 of Balancing Authority Reliability-based Controls:</u> <u>Reserves</u> Status: Monitor	TBD	BPS/TIMTF
d)	Revise TLR level 5 to be treated similarly to TLR Level 3 in terms of treating the next hour allocation separately from that of current hour. (<u>R11020</u>) Status: Pending EC Action	TBD	BPS
e)	Coordinate with NERC on changes to the definition of Bulk Electric System NERC <u>Project 2010-17 Definition of Bulk Electric System</u> (Phase 2). Status: <u>Complete</u>	1 st Q, 2014	SRS
f)	Develop complementary standards that align with NERC <u>Project 2013-04</u> Voltage and Reactive Planning and Control (formerly <u>Project 2008-01</u> and now rolled into Project 2013-04).	3 rd Q, 2014	BPS
	Status: Complete		
g)	Develop complementary standards that align with NERC <u>Project 2010-04</u> <u>Demand Data (MOD C)</u> . The NERC project may impact WEQ-015 Business Practices for Measurement and Verification of Wholesale Electricity Demand Response.	3 rd Q, 2014	DSM-EE
	Status: Complete		
h)	Develop, modify or delete business practice standards to support request <u>R14002</u> (NERC <u>Project 2012-05 ATC Revisions (MOD A</u>)). ³ Status: Started	2 nd Q, 2015	BPS

¹ See AP Item 3.iv. Completion dates may be revisited contingent upon NERC-NAESB coordination of implementation related to parallel flow visualization.

² In some sections of WEQ-008 it appears that the standards are applicable to all of the Interconnections and other it appears that the standards are only applicable to the Eastern Interconnection. The title indicates the standards are applicable to the Eastern Interconnection. ³The FERC NOPR issued June 19, 2014, available at the following link: <u>http://www.ferc.gov/whats-new/comm-meet/2014/061914/E-17.pdf</u>.

		Item Description	Completion ⁱ	Assignment ⁱⁱ
i)		ate with NERC on NERC <u>Project 2012-08 Glossary Updates</u> . The NERC nay impact WEQ-000 Abbreviations, Acronyms, and Definition of Terms Complete	1 st Q, 2014	SRS
j)	project n Intercon	ate with NERC on NERC <u>Project 2012-09 IRO Review</u> . The NERC nay impact WEQ-008 Transmission Loading Relief – Eastern nection Standards. Iot Started	TBD	BPS
k)	activities	, modify or delete business practices standards to support NERC related to NERC Time Error Correction (BAL-004-0) Not Started	TBD	BPS
. De	velop busi	ness practice standards in support of the FERC RM05-25-000 and RM	405-17-000 (OA	ATT Reform) ⁴
a)	transmis Status: U Request	version 3 business practice standards to better coordinate the use of the tra- sion providers. Jnderway R05004 was expanded to include the <u>Order No. 890 (Docket Nos.RM05-1</u>	-	
		<u>Socket Nos. RM05-17-001, 002 and RM05-25-001, 002</u>), and <u>Order No. 8</u> <u>5-03)</u> "Preventing Undue Discrimination and Preference in Transmission S	90-B (Docket N	
	<u>RM05-2</u> i) 1	Docket Nos. RM05-17-001, 002 and RM05-25-001, 002), and Order No. 8	90-B (Docket N	
	<u>RM05-2</u> i) 1	 <u>Docket Nos. RM05-17-001, 002 and RM05-25-001, 002</u>), and <u>Order No. 8</u> <u>5-03</u>) "Preventing Undue Discrimination and Preference in Transmission S Group 4: Preemption; Request No. <u>R05019 (Part of Preemption and Competition)</u> 	<u>90-B (Docket N</u> Services"	os. RM05-17-03 ar
	RM05-2 i) 1 si) 1 sii) C ii) 1	 <u>Docket Nos. RM05-17-001, 002 and RM05-25-001, 002</u>, and <u>Order No. 8</u> <u>5-03</u> "Preventing Undue Discrimination and Preference in Transmission S Group 4: Preemption; Request No. <u>R05019 (Part of Preemption and Competition)</u> Status: Started 	<u>90-B (Docket N</u> Services"	os. RM05-17-03 an

⁴ FERC Order No. 890, issued February 16, 2007, can be accessed from the following link:

http://www.naesb.org/doc_view4.asp?doc=ferc021607.doc.

⁵ Paragraph 1627 of FERC Order No. 890, issued February 16, 2007: We agree with suggestions for the posting of additional curtailment information on OASIS and, therefore, require transmission providers, working through NAESB, to develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. Transmission providers need not implement this new OASIS functionality and any related business practices until NAESB develops appropriate standards. These postings must include 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. This information is in addition to the Commission's existing requirements: (1) when any transmission provider must state on OASIS the reason why the transaction could not be constraint or interruption on OASIS, and the vertailment or interruption, including the operating status of facilities involved in the constraint or interruption, must be maintained for three years and made available upon request to the curtailed or interrupted customer, the Commission's Staff, and any other person who requests it; and, (3) any offer to adjust the operation of the transmission provider's system to restore a curtailed or interrupted transaction must be posted and made available to all curtailed and interrupted transmission customers at the same time.

				Item Description	Completion ⁱ	Assignment ⁱⁱ
				s practices standards to improve the current operation of the whole siness practice and communication standards for OASIS and Elec		
8	a)		op and ss inclu	I/or maintain business practice standards as needed for OASIS and elecude:	tronic schedulin	g. Specific items to
		i)		e remaining incremental enhancements to OASIS as an outgrowth of the erence on the future of OASIS ($\underline{R05026}$).	e NAESB Marc	h 29, 2005
			-	ing <u>statement</u> completed by SRS. There were a number of assignments anding items are included below:	s from the Stand	ards Request. The
			1)	Eliminate Masking of TSR tag source and sink when requested status is denied, withdrawn refused, displaced, invalid, declined, annulled or retracted Status: Not Started	TBD	OASIS
			2)	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.	TBD	OASIS
				Status: Underway (upon further development of this item by NAESB, a completion date will be determined)		
			3)	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. Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	TBD	OASIS
		ii)	Stand Coor R4 at	ew and correct WEQ-004 Coordinate Interchange Business Practice dard as needed based on activities in NERC <u>Project 2008-12</u> , <u>rdinate Interchange Standards Revisions</u> and supporting EOP-002-2 nd R6. ⁶ us: Complete	3 rd Q, 2014	CISS
ł	b)	Revie	w e-Ta	ag specifications and make modifications as needed for:		
		i)		oorting Network Integration Transmission Service standards is: Complete	1 st Q, 2014	CISS
		ii)		sistency and clarifications as: Complete	1 st Q, 2014	CISS
		iii)	impa	onal Implementations supporting WECC efforts (probably of most ct to the appendices in the e-Tag specifications) is: Complete	1 st Q, 2014	CISS
C	c)	-		ts for OASIS to use data in the Electric Industry Registry (<u>R12001</u>) Started	TBD	OASIS

⁶ See AP Item 1.a.iv. Completion dates may be revisited contingent upon NERC-NAESB coordination of implementation related to parallel flow visualization.

NORTH AMERICAN ENERGY STANDARDS BOARD 2014 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT Adopted by Board of Directors on December 11, 2014

		Item Description	Completion ⁱ	Assignment ⁱⁱ
4.	Dev	elop and/or maintain standard communication protocols and - cybersecurity bu	isiness practice	s as needed.
	a)	Develop modifications for WEQ-012 as needed to reflect current market conditions		
		 Review and develop standards as needed to support adequate session encryption (SSL/TLS issues: <u>US-Cert Vulnerability Note VU#864643</u>) Status: Complete 	1 st Q, 2014	Cybersecurity Subcommittee
		 Review annually at a minimum, the accreditation requirements for Authorized Certification Authorities to determine if any changes are needed to meet market conditions.⁷ Status: Complete 	4 th Q, 2013	Cybersecurity Subcommittee
	b)	Review WEQ standards for impact of XML vulnerability exploits and make modifications as needed to standards and functional specifications Status: Not Started	TBD	Cybersecurity Subcommittee/ CISS
•	Mai	ntain existing body of Version 3.x standards		
	a)	Consistent with ¶51 of FERC Order No. 890-A, add AFC and TFC values to the "System_Attribute" data element of the NAESB Standard WEQ-003: OASIS S&CP Data Dictionaries. (<u>R08011</u>) Status: Underway	2015	OASIS
	b)	Correct WEQ 013-2.6.7.2. – Resale off OASIS (<u>R08027</u>) Status: Not Started	TBD	OASIS
	c)	Add language to WEQ-001-4 Online Negotiation and Confirmation process to clarify Table 4-3 (<u>R09003</u>) Status: Started	2015	OASIS
	d)	Create a new OASIS mechanism that allows for the merger of like reservations without the use of the resale mechanism (<u>R09015</u>) Status: Not Started	TBD	OASIS
	e)	Improve transparency to allow customers to determine whether they have been treated in a non-discriminatory manner by posting of additional information on OASIS when service is denied (i.e. refused or declined) by customer(s) using new SAMTS process across multiple transmission systems to serve their NITS load on multiple systems. (R12006)	TBD	OASIS
		Status: Not Started		
•	Dev	elop or modify standards to Support <u>FERC Order No. 676-E</u> , (Docket No. RM	05-5-013)	
	a)	Develop standards to support the Transmission Provider right to reassess the availability of conditional firm (See $\P 72^8$) Status: Not Started	TBD	OASIS

⁷ The "NAESB Accreditation Requirements for Authorized Certification Authorities" can be found at: <u>http://www.naesb.org/member_login_check.asp?doc=certification_specifications.docx</u>.

⁸ 72. However, we reiterate here the Commission's finding in Order No. 890 that a transmission provider is permitted to extend its right to reassess the availability of conditional firm service. Since the Version 002.1 Standards do not specifically address this issue, we would ask the industry, working through NAESB, to continue to look at additional business practice standards facilitating a transmission provider's extension of its right to perform a reassessment.

		Item Description	Completion ⁱ	Assignment ⁱⁱ
7.	Dev	relop or modify standards to Support <u>FERC Order No. 676-H</u> (Docket No. RM)	05-5-022)	
	a)	Consistent with FERC Order Nos. 890 and 676-H, modify NAESB standards WEQ-001-14.1.3 and WEQ-001-15.1.2 to provide for a one-day requirement for posting Available Transfer Capability narratives. (See \P 29). Status: Not Started	TBD	OASIS
	b)	Modify NAESB standards WEQ-001-9.5, WEQ-001-10.5, and related standards to be consistent with the Commission's policy in <i>Dynegy Power Marketing, Inc.</i> , 99 FERC ¶ 61,054 (2002) and <i>Entergy Services, Inc.</i> , 137 FERC ¶ 61,199 (2011), <i>order on reh'g and compliance</i> , 143 FERC ¶ 61,143 (2013). (See ¶ 49). Status: Started	2015	OASIS
	c)	Revise NAESB standard WEQ-001-106.2.5 to clarify when Transmission Providers may refuse a request for terminating secondary network service based on the availability of capacity. (See \P 59). Status: Not Started	2015	OASIS
	d)	Consider Bonneville Power Administration comment concerning the treatment of a conditional point-to-point reservation included in a coordinated group when displaced through preemption. (See \P 65). Not Started	2015	OASIS
8.	DS	M-EE Certification Program		
	a)	Develop a specification for energy efficiency products and services to support a certification program. Status: Complete	4 th Q, 2013	DSM-EE
	b)	Develop a specification for demand response products and services to support a certification program. Status: Complete	3 rd Q, 2014	DSM-EE
9.	Gas	S/Electric Coordination		
	a)	As provided for the GEH Report approved by the Board of Directors on September 20, 2012, (<u>http://www.naesb.org/pdf4/bd092012a1.pdf</u>), which was initiated by the NPC Report ⁹ , review and provide direction to develop standards or modify existing standards as needed for market timelines and coordination of scheduling. Status: Closed.	3 rd Q, 2014	Gas-Electric Harmonization Committee & Forum, WEQ EC, WGQ EC

⁹ Review and develop standards as needed and requested based on the National Petroleum Council (NPC) findings as communicated by the NAESB Board of Directors, government agencies or reliability organizations, as applicable. (9-15-11 NPC Report: <u>http://www.npc.org/NARD-ExecSummVol.pdf</u>)

	Item Description	Completion ⁱ	Assignment ⁱⁱ
b)	As provided for the GEH Report approved by the Board of Directors on September 20, 2012, (<u>http://www.naesb.org/pdf4/bd092012a1.pdf</u>), which was initiated by the NPC Report ¹⁰ , review and provide direction to develop standards or modify existing standards as needed for flexibility in scheduling. Status: Closed.	3 rd Q, 2014	Gas-Electric Harmonization Committee & Forum, WEQ EC, WGQ EC
c)	As provided for the GEH Report approved by the Board of Directors on September 20, 2012, (<u>http://www.naesb.org/pdf4/bd092012a1.pdf</u>), which was initiated by the NPC Report ¹¹ , review and provide direction to develop standards or modify existing standards as needed for provision of information. Status: .Closed.	3 rd Q, 2014	Gas-Electric Harmonization Committee & Forum, WEQ EC, WGQ EC

¹⁰ Id.

NORTH AMERICAN ENERGY STANDARDS BOARD 2014 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT Adopted by Board of Directors on December 11, 2014

PROVISIONAL ITEMS

1. Gas/Electric Coordination

a) Conduct assessment to determine if Electric Industry Requirements documented in WEQ-011 Gas / Electric Coordination should be considered reliability requirements and transition to NERC.

2. **Optional work to extend existing standards**

- a) Prepare recommendations for future path for TLR¹² (Phase 2) in concert with NERC, which may include alternative congestion management procedures¹³. Work on this activity is dependent on completing 2010 WEQ Annual Plan 1.a (Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection Phase 1).
- b) Develop needed business practice standards for organization/company codes for NAESB standards and address current issues on the use of DUNs numbers. Common code usage is linked to the transition of the Registry from NERC to NAESB.
- c) 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)¹⁴.

3. Pending Regulatory or Legislative Action

- a) Determine NAESB action needed to support FERC Action Plan for Smart Grid Technology.
- b) Develop business practice standards for cap and trade programs for greenhouse gas.
- c) Develop standards as needed based on FERC Order No. 1000. (NAESB Analysis of FERC Order No. 1000)
- d) Develop standards as needed in support of Variable Energy Resources (VERs) final order (RM10-11-000). (<u>NAESB</u> <u>Comments 3-2-11, FERC NOPR RM10-11-000, FERC Final Order No. 764, Docket No. RM10-11-000¹⁵</u>)

¹² Phase 2 of the Parallel Flow Visualization looks at developing options for and reporting of the most cost effective alternatives to achieve curtail obligations assigned during Phase 1.

¹³ For additional information, please see comments submitted by PJM and Midwest ISO for this Annual Plan Item:

http://www.naesb.org/pdf3/weq_aplan102907w1.pdf.

¹⁴ 805. 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.

¹⁵ For FERC Final Order No. 764, Docket No. RM10-11-000, specifically paragraph nos. 146 and 182 should be reviewed:

^{146.} The Commission concludes that an independent review of NERC standards and NAESB business practices is not necessary prior to the implementation of intra-hour scheduling. As noted by NERC, several entities currently offer intra-hour scheduling without any apparent conflict with Reliability Standards. NERC comments that it does not believe there are any existing standards that prohibit industry from implementing intra-hour scheduling, and no commenters have pointed to specific NAESB business practices that prevent industry from implementing intra-hour scheduling. The Commission therefore concludes that it is not necessary to delay adoption of the intra-hour scheduling requirements of this Final Rule pending further review of NERC Reliability Standards and NAESB business practices. To the extent industry believes it is beneficial to refine one or more existing NERC Reliability Standards or NAESB business practices to reflect intra-hour scheduling, stakeholders can use existing processes to pursue such refinements.

^{182.} Some commenters request that the Commission standardize protocols for reporting meteorological or forced outage data required by this Final Rule. The Proposed Rule did not contain standard protocols for data reporting and, as a result, the merits of such a requirement have not been fully addressed in the record. Whether standardization of data communications would facilitate or hinder development of

Comments of the North American Energy Standards Board Standards for Business Practices and Communication Protocols for Public Utilities (Docket No. RM05-5-022) December 18, 2014

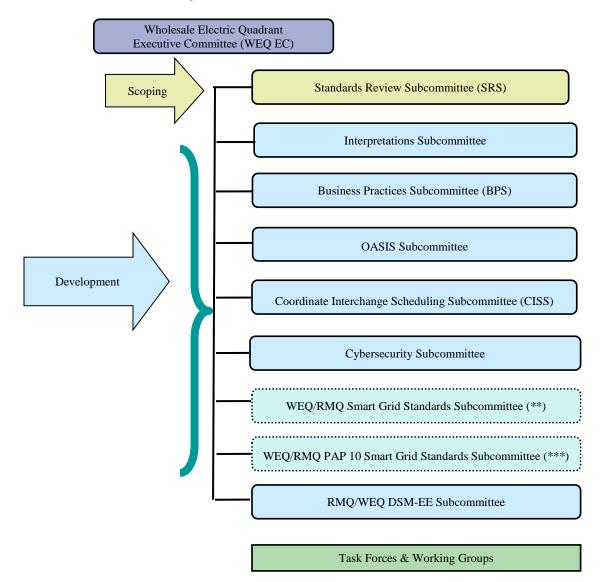
Appendix D: NAESB 2014 Wholesale Electric Quadrant Annual Plan

NORTH AMERICAN ENERGY STANDARDS BOARD 2014 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT Adopted by Board of Directors on December 11, 2014

PROVISIONAL ITEMS

 e) Develop and/or modify Demand Response Standards as needed in conformance with final D.C. Circuit ruling on FERC Order No. 745

WHOLESALE ELECTRIC QUADRANT EXECUTIVE COMMITTEE AND SUBCOMMITTEE STRUCTURE



power production forecasting may implicate a variety of data and communications issues that would benefit from broad industry input through standards development processes such as those used by NAESB and other organizations.

NAESB WEQ EC and Active Subcommittee Leadership:

Executive Committee (EC): Kathy York (Chair) and Bob Harshbarger (Vice Chair)
Standards Review Subcommittee (SRS): Rebecca Berdahl
Interpretations Subcommittee: Ed Skiba
Business Practices Subcommittee (BPS) & Time and Inadvertent Management Task Force (TIMTF): Jason Davis, Ross Kovacs, Narinder Saini
Open Access Same Time Information System (OASIS) Subcommittee: J.T. Wood, Alan Pritchard
Coordinate Interchange Scheduling Subcommittee (CISS): Bob Harshbarger (NAESB), Joshua Phillips (NERC)
Cybersecurity Subcommittee: Jim Buccigross
Demand Side Management-Energy Efficiency (DSM-EE) RMQ/WEQ Subcommittee: Ruth Kiselewich (RMQ), Roy True (WEQ), Paul Wattles (WEQ), and Eric Winkler (RMQ)

Inactive Subcommittees:

e-Tariff Joint WEQ/WGQ Subcommittee (e-Tariff): Keith Sappenfield (WGQ)

- (**) The Smart Grid Standards Subcommittee is a joint group of the retail electric and wholesale electric quadrants with other standards development groups such as OASIS (Organization for the Advancement of Structured Information Standards, not Open Access Same Time Information Systems related to NAESB standards and FERC actions), CalConnect, FIX and UCAIug, among others. Direction may be given from NIST, DoE or FERC and the group reports jointly to the NAESB Board Smart Grid Strategic Steering Committee and the WEQ and RMQ ECs.
- (***) The PAP 10 Smart Grid Standards Subcommittee is a joint group of the retail electric and wholesale electric quadrants with other standards development groups such as OASIS, UCAIug, OpenADE, ZigBee, ASHRAE, EIS Alliance, NARUC and includes other groups. Direction may be given from NIST, DoE or FERC and the group reports jointly to the NAESB Board Smart Grid Strategic Steering Committee and the WEQ and RMQ ECs

NORTH AMERICAN ENERGY STANDARDS BOARD 2015 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT Adopted by the Board of Directors on December 11, 2014

	Item Description	Completion ⁱⁱⁱ	Assignment ⁱ			
De	velop business practices standards as needed to complement reliability standard	ls				
sta ap	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)	Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection – Permanent Solution ¹ Note: Consideration should be given to provisional item 2.a. Work is being	TBD	BPS			
	coordinated with the IDC Association. Status: Pending EC Action					
b)	Perform consistency review of WEQ-008 Transmission Loading Relief Business Practice Standards and develop recommendation. ² Status: Pending EC Action	TBD	BPS			
c)	Disturbance Control Standard (DCS) (BAL-002) Coordination with NERC <u>Project 2010-14.1 Phase 1 of Balancing Authority Reliability-based Controls:</u> <u>Reserves</u> Status: Monitor	TBD	BPS/TIMTF			
d)	Revise TLR level 5 to be treated similarly to TLR Level 3 in terms of treating the next hour allocation separately from that of current hour. (R11020) Status: Pending EC Action	TBD	BPS			
e)	Develop, modify or delete business practice standards to support request <u>R14002</u> (NERC <u>Project 2012-05 ATC Revisions (MOD A</u>)). ³ Status: Started	2 nd Q, 2015	BPS			
f)	Develop, modify or delete business practices standards to support NERC activities related to NERC Time Error Correction (BAL-004-0) Status: Not Started	TBD	BPS			
De	velop business practice standards in support of the FERC RM05-25-000 and RM	M05-17-000 (OA	TT Reform) ⁴			
a)	Develop version 3 business practice standards to better coordinate the use of the tr	ansmission system	m among neighbo			

a) Develop version 3 business practice standards to better coordinate the use of the transmission system among neighboring transmission providers.
 Status: Underway
 Request R05004 was expanded to include the <u>Order No. 890 (Docket Nos.RM05-17-000 and RM02-25-000)</u>, (<u>Order No. 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002)</u>, and <u>Order No. 890-B (Docket Nos. RM05-17-03 and RM05-25-03)</u> "Preventing Undue Discrimination and Preference in Transmission Services"

² In some sections of WEQ-008 it appears that the standards are applicable to all of the Interconnections and other it appears that the standards are only applicable to the Eastern Interconnection. The title indicates the standards are applicable to the Eastern Interconnection. ³The FERC NOPR issued June 19, 2014, available at the following link: <u>http://www.ferc.gov/whats-new/comm-meet/2014/061914/E-17.pdf</u>.

⁴ FERC Order No. 890, issued February 16, 2007, can be accessed from the following link:

		Item Description	Completion ⁱⁱⁱ	Assignment ^{iv}
	i)	Group 4: Preemption; Request No. R05019 (Part of Preemption and Co	mpetition)	
		Status: Started	2015	OASIS
	ii)	Group 6: Miscellaneous (Paragraph 1627 ⁵ of FERC Order No. 890)		
		 Paragraphs 1627 of Order 890 – Posting of additional information on OASIS regarding firm transmission curtailmer Status: Not Started 	TBD	OASIS
		 Redispatch Cost Posting to allow for posting of third party offers o planning redispatch services. Status: Not Started 	f TBD	OASIS
an	d main	business practices standards to improve the current operation of the w tain business practice and communication standards for OASIS and E	lectronic Scheduli	ng
a)		lop and/or maintain business practice standards as needed for OASIS and ess include:	electronic schedulin	ig. Specific items t
	i)	Make remaining incremental enhancements to OASIS as an outgrowth conference on the future of OASIS ($R05026$).	of the NAESB Marc	h 29, 2005
		Scoping <u>statement</u> completed by SRS. There were a number of assignment outstanding items are included below:	ents from the Stand	lards Request. The
			TBD	lards Request. The
		 outstanding items are included below: 1) Eliminate Masking of TSR tag source and sink when requested status is denied, withdrawn refused, displaced, invalid, declined, annulled or retracted 	TBD e" TBD	•

⁵ Paragraph 1627 of FERC Order No. 890, issued February 16, 2007: We agree with suggestions for the posting of additional curtailment information on OASIS and, therefore, require transmission providers, working through NAESB, to develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. Transmission providers need not implement this new OASIS functionality and any related business practices until NAESB develops appropriate standards. These postings must include 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. This information is in addition to the Commission's existing requirements: (1) when any transmission provider must state on OASIS the reason why the transaction could not be continued or completed; (2) information to support any such curtailment or interruption, including the operating status of facilities involved in the constraint or interruption, must be maintained for three years and made available upon request to the curtailed or interrupted customer, the Commission's Staff, and any other person who requests it; and, (3) any offer to adjust the operation of the transmission provider's system to restore a curtailed or interrupted transaction must be posted and made available to all curtailed and interrupted transmission customers at the same time.

		Item Description	Completion ⁱⁱⁱ	Assignment			
	b)	Requirements for OASIS to use data in the Electric Industry Registry (<u>R12001</u>) Status: Not Started	TBD	OASIS			
4.	Develop and/or maintain standard communication protocols and - cybersecurity business practices as needed.						
	a)	Develop modifications for WEQ-012 as needed to reflect current market conditions					
		 Review annually at a minimum, the accreditation requirements for Authorized Certification Authorities to determine if any changes are needed to meet market conditions.⁶ Status: Not Started 	2015	Cybersecurity Subcommittee			
	b)	Review WEQ standards for impact of XML vulnerability exploits and make modifications as needed to standards and functional specifications Status: Not Started	TBD	Cybersecurity Subcommittee/ CISS			
	c)	Evaluate and modify standards as needed to support and/or complement the current version of the NERC Critical Infrastructure Protection Standards ⁷ and any other activities of the FERC related to cybersecurity.	2 nd Q, 2015	Cybersecurity Subcommittee			
5	Maintain existing body of Version 3.x standards						
	a)	Consistent with ¶51 of FERC Order No. 890-A, add AFC and TFC values to the "System_Attribute" data element of the NAESB Standard WEQ-003: OASIS S&CP Data Dictionaries. (<u>R08011</u>) Status: Underway	2015	OASIS			
	b)	Correct WEQ 013-2.6.7.2. – Resale off OASIS (<u>R08027</u>) Status: Not Started	TBD	OASIS			
	c)	Add language to WEQ-001-4 Online Negotiation and Confirmation process to clarify Table 4-3 (<u>R09003</u>) Status: Started	2015	OASIS			
	d)	Create a new OASIS mechanism that allows for the merger of like reservations without the use of the resale mechanism (<u>R09015</u>) Status: Not Started	TBD	OASIS			
	e)	Improve transparency to allow customers to determine whether they have been treated in a non-discriminatory manner by posting of additional information on OASIS when service is denied (i.e. refused or declined) by customer(s) using new SAMTS process across multiple transmission systems to serve their NITS load on multiple systems. (<u>R12006</u>) Status: Not Started	TBD	OASIS			
	f)	Review WEQ-004, EIR Business Practice Standards, e-Tag Specification, and e- Tag Schema to make the necessary modifications to recognize the Market Operator Role within the Electric Industry Registry	2015	CISS			

⁶ The "NAESB Accreditation Requirements for Authorized Certification Authorities" can be found at: http://www.naesb.org/member_login_check.asp?doc=certification_specifications.docx. ⁷ http://www.nerc.com/pa/Stand/Pages/CIPStandards.aspx

		Item Description	Completion ⁱⁱⁱ	Assignment ^{iv}			
6.	Develop or modify standards to Support FERC Order No. 676-E, (Docket No. RM 05-5-013)						
	a)	Develop standards to support the Transmission Provider right to reassess the availability of conditional firm (See $\P 72^8$) Status: Not Started	TBD	OASIS			
7.	Develop or modify standards to Support FERC Order No. 676-H (Docket No. RM05-5-022)						
	a)	Consistent with FERC Order Nos. 890 and 676-H, modify NAESB standards WEQ-001-14.1.3 and WEQ-001-15.1.2 to provide for a one-day requirement for posting Available Transfer Capability narratives. (See ¶ 29). Status: Not Started	TBD	OASIS			
	b)	Modify NAESB standards WEQ-001-9.5, WEQ-001-10.5, and related standards to be consistent with the Commission's policy in <i>Dynegy Power Marketing, Inc.</i> , 99 FERC ¶ 61,054 (2002) and <i>Entergy Services, Inc.</i> , 137 FERC ¶ 61,199 (2011), <i>order on reh'g and compliance</i> , 143 FERC ¶ 61,143 (2013), 148 FERC ¶ 61,209 (2014). (See ¶ 49). Status: Started	2015	OASIS			
	c)	Revise NAESB standard WEQ-001-106.2.5 to clarify when Transmission Providers may refuse a request for terminating secondary network service based on the availability of capacity. (See \P 59). Status: Not Started	2015	OASIS			
	d)	Consider Bonneville Power Administration comment concerning the treatment of a conditional point-to-point reservation included in a coordinated group when displaced through preemption. (See \P 65). Not Started	2015	OASIS			

⁸ 72. However, we reiterate here the Commission's finding in Order No. 890 that a transmission provider is permitted to extend its right to reassess the availability of conditional firm service. Since the Version 002.1 Standards do not specifically address this issue, we would ask the industry, working through NAESB, to continue to look at additional business practice standards facilitating a transmission provider's extension of its right to perform a reassessment.

NORTH AMERICAN ENERGY STANDARDS BOARD 2015 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT As Proposed by the WEQ Annual Plan Subcommittee

PROVISIONAL ITEMS

1. Gas/Electric Coordination

a) Conduct assessment to determine if Electric Industry Requirements documented in WEQ-011 Gas / Electric Coordination should be considered reliability requirements and transition to NERC.

2. **Optional Work to Extend Existing Standards**

- a) Prepare recommendations for future path for TLR⁹ (Phase 2) in concert with NERC, which may include alternative congestion management procedures¹⁰. Work on this activity is dependent on completing 2010 WEQ Annual Plan 1.a (Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection Phase 1).
- b) Develop needed business practice standards for organization/company codes for NAESB standards and address current issues on the use of DUNs numbers. Common code usage is linked to the transition of the Registry from NERC to NAESB.

3. **Pending Regulatory or Legislative Action**

- a) Determine NAESB action needed to support FERC Action Plan for Smart Grid Technology.
- b) Develop business practice standards for cap and trade programs for greenhouse gas.
- c) Develop standards as needed based on FERC Order No. 1000. (<u>NAESB Analysis of FERC Order No. 1000</u>)
- d) Develop standards as needed in support of Variable Energy Resources (VERs) final order (RM10-11-000). (<u>NAESB</u> <u>Comments 3-2-11, FERC NOPR RM10-11-000, FERC Final Order No. 764, Docket No. RM10-11-000¹¹</u>)
- f) Develop and/or modify Demand Response Standards as needed in conformance with final D.C. Circuit ruling on FERC Order No. 745

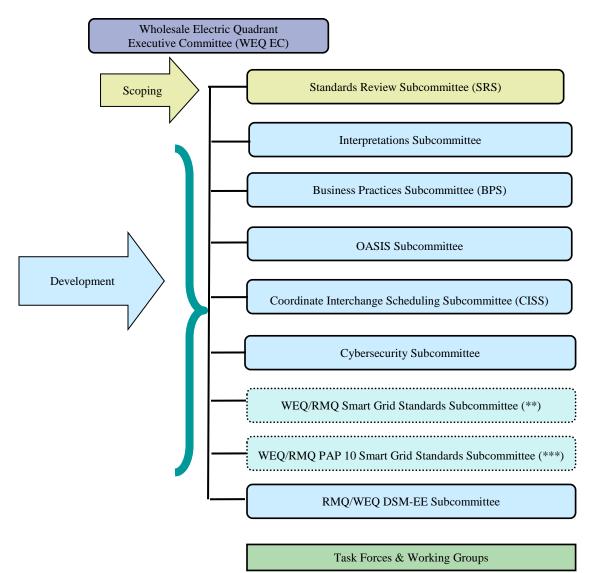
⁹ Phase 2 of the Parallel Flow Visualization looks at developing options for and reporting of the most cost effective alternatives to achieve curtail obligations assigned during Phase 1.

¹⁰ For additional information, please see comments submitted by PJM and Midwest ISO for this Annual Plan Item: <u>http://www.naesb.org/pdf3/weq_aplan102907w1.pdf</u>.

¹¹ For FERC Final Order No. 764, Docket No. RM10-11-000, specifically paragraph nos. 146 and 182 should be reviewed:

^{146.} The Commission concludes that an independent review of NERC standards and NAESB business practices is not necessary prior to the implementation of intra-hour scheduling. As noted by NERC, several entities currently offer intra-hour scheduling without any apparent conflict with Reliability Standards. NERC comments that it does not believe there are any existing standards that prohibit industry from implementing intra-hour scheduling, and no commenters have pointed to specific NAESB business practices that prevent industry from implementing intra-hour scheduling. The Commission therefore concludes that it is not necessary to delay adoption of the intra-hour scheduling requirements of this Final Rule pending further review of NERC Reliability Standards and NAESB business practices. To the extent industry believes it is beneficial to refine one or more existing NERC Reliability Standards or NAESB business practices to reflect intra-hour scheduling, stakeholders can use existing processes to pursue such refinements.

^{182.} Some commenters request that the Commission standardize protocols for reporting meteorological or forced outage data required by this Final Rule. The Proposed Rule did not contain standard protocols for data reporting and, as a result, the merits of such a requirement have not been fully addressed in the record. Whether standardization of data communications would facilitate or hinder development of power production forecasting may implicate a variety of data and communications issues that would benefit from broad industry input through standards development processes such as those used by NAESB and other organizations.



WHOLESALE ELECTRIC QUADRANT EXECUTIVE COMMITTEE AND SUBCOMMITTEE STRUCTURE

NAESB WEQ EC and Active Subcommittee Leadership:

Executive Committee (EC): Kathy York (Chair) and Bob Harshbarger (Vice Chair) Standards Review Subcommittee (SRS): Rebecca Berdahl Interpretations Subcommittee: Ed Skiba Business Practices Subcommittee (BPS) & Time and Inadvertent Management Task Force (TIMTF): Jason Davis, Ross Kovacs, Narinder Saini Open Access Same Time Information System (OASIS) Subcommittee: J.T. Wood, Alan Pritchard Coordinate Interchange Scheduling Subcommittee (CISS): Bob Harshbarger (NAESB), Joshua Phillips (NERC) Cybersecurity Subcommittee: Jim Buccigross Demand Side Management-Energy Efficiency (DSM-EE) RMQ/WEQ Subcommittee: Ruth Kiselewich (RMQ), Roy True (WEQ), Paul Wattles (WEQ), and Eric Winkler (RMQ)

Inactive Subcommittees:

e-Tariff Joint WEQ/WGQ Subcommittee (e-Tariff): Keith Sappenfield (WGQ)

- (**) The Smart Grid Standards Subcommittee is a joint group of the retail electric and wholesale electric quadrants with other standards development groups such as OASIS (Organization for the Advancement of Structured Information Standards, not Open Access Same Time Information Systems related to NAESB standards and FERC actions), CalConnect, FIX and UCAIug, among others. Direction may be given from NIST, DoE or FERC and the group reports jointly to the NAESB Board Smart Grid Strategic Steering Committee and the WEQ and RMQ ECs.
- (***) The PAP 10 Smart Grid Standards Subcommittee is a joint group of the retail electric and wholesale electric quadrants with other standards development groups such as OASIS, UCAIug, OpenADE, ZigBee, ASHRAE, EIS Alliance, NARUC and includes other groups. Direction may be given from NIST, DoE or FERC and the group reports jointly to the NAESB Board Smart Grid Strategic Steering Committee and the WEQ and RMQ ECs.

End Notes WEQ 2014 Annual Plan and WEQ 2015 Annual Plan

End Notes WEQ 2014 Annual Plan:

ⁱ Dates in the completion column are by end of the quarter for completion by the assigned committee, sub-committee or task force. 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.

ⁱⁱ The assignments are abbreviated. The abbreviations and sub-committee structure can be found at the end of the annual plan document.

End Notes WEQ 2015 Annual Plan:

ⁱⁱⁱ Dates in the completion column are by end of the quarter for completion by the assigned committee, sub-committee or task force. 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.

^{iv} The assignments are abbreviated. The abbreviations and sub-committee structure can be found at the end of the annual plan document.