-----Original Message-----  
From: Chris Norton  
Sent: Monday, November 28, 2016 2:44 PM  
Subject: FW: NAESB WEQ Request for Formal Comments on Recommendation to Support Request R16011 – Due November 30, 2016 (AMP Comments)

American Municipal Power, Inc. wishes to comment on the Appeal of 2015 API 2.a.i.2 (Long-Term Rollover Rights Competition). AMP is a Transmission Customer that operates under the MISO RTO and PJM RTO tariffs. AMP also has members who operate under the LG&E/KU Tariff.

Specifically AMP is concerned with Section 001-20. The purpose of the NAESB standard is to provide consistency in this process for both Transmission Providers and Transmission Customers. Section 001-20 allows the Transmission Provider to create a separate process through its own business practices regardless of the requirements contained in the NAESB standard. This would be done without formally going through the typical FERC reviewed exception process. The end result will be a patchwork of different regulations between various Transmission Providers that have not been subjected to FERC review. AMP requests that the language “A Transmission Provider may implement an alternate competition process, and shall specify such process in its Business Practices that are posted in accordance with Business Practice Standard WEQ-001-13.1.4.” in Section 001-20 be removed and that NEASB finalize a uniform standard for this issue.

Chris Norton

American Municipal Power, Inc.

1111 Schrock Road, Suite 100

Columbus, OH 43229

-----Original Message-----

From: [naesbmail@naesb.org](mailto:naesbmail@naesb.org) [<mailto:naesbmail@naesb.org>]

Sent: Monday, October 31, 2016 2:49 PM

To: Chris Norton

Subject: NAESB WEQ Request for Formal Comments on Recommendation to Support Request R16011 – Due November 30, 2016

Dear Wholesale Electric Quadrant Members and Interested Industry Participants,

The following recommendation was approved by the WEQ OASIS Subcommittee. An industry comment period begins today, October 31, 2016 and ends at the close of business on November 30, 2016 for the following Wholesale Electric Quadrant recommendation:

Recommendation:

R16011 – Appeal of 2015 API 2.a.i.2 (Long-Term Rollover Rights Competition)

Recommendation: <https://www.naesb.org/member_login_check.asp?doc=weq_r16011_rec.docx>

All interested parties, regardless of membership status within NAESB, are eligible to submit comments for consideration. The Wholesale Electric Quadrant Executive Committee will review the recommendation and consider for vote at the meeting following the close of the comment period. This meeting will be open, as all NAESB meetings, and we encourage those who submit comments to attend.

All comments received by the NAESB office by end of business on November 30, 2016 will be posted on the Request and Standards Activity Applicable to Wholesale Electric Quadrant page (<http://naesb.org/weq_request.asp>) and forwarded to the Wholesale Electric Quadrant Executive Committee members for their consideration. If you have difficulty downloading the recommendations, please call the NAESB office at (713) 356-0060.

Best Regards,

Caroline Trum

NAESB Deputy Director