Submitted by J. Manning of NCEMC on 2/23/2012

**General Comment:**

NCEMC wishes to express its gratitude to the NAESB OS leadership and members for the hard work and perseverance over the past many years in addressing the issues raised in this forum. Overall, NCEMC sees the NITS on OASIS process as presented working fairly well with a few concerns expressed below in formal comments. NCEMC offers the following formal comments in an effort to minimize various interpretations that may lead to inconsistencies when Transmission Providers implement processes as they strive to comply with the proposed NITS on OASIS standards.

**Recommendation:**

No comments

**Attachment 1 – WEQ-000:**

Definition of Network Scheduling Right - NCEMC agrees with comments submitted by SRS regarding the definition for Network Scheduling Right, but given this is a totally new concept and optional provision for Network Service on OASIS, the definition should be maintained somewhere to provide explanation for those TPs that use NSRs.

Definition of Request Interval: Is this term unique to only Network Service or does it apply to PTP also? If so, NCEMC suggests revising definition to apply to either.

**Attachment 2 – WEQ-001:**

Page 8, 001-101.9: As written, this standard could lead to various interpretations and inconsistencies among Transmission Providers, and as such would be difficult to be audited. The standard should be made clear as to what status changes should be provided reasons and not only for “certain status changes”. Also see comment under Attachment 5 for WEQ-013-101.7 as it is related.

Page 13, 001-103.4.1 and 001-103.5.1: When a NITS Application or a component of such Application is to be refused due to “insufficient ATC”, NCEMC is concerned that the only alternative being proposed here is to counteroffer to the NITS Customer when something less than the requested amount can be accommodated. It sets up a possibility of the NITS Customer from being able to reliably serve its network demand either now or at some point in the future. An alternative would be to evaluate the potential upgrades needed via a study and have the NITS Customer pay for such upgrades. Perhaps this process is implied within standards proposed, but it needs to be made clear or be stated explicitly in our opinion.

Page 23-28, 001-105.3.1.4 in contrast with standards in sections 001-105.3.2 for Temporary Termination and 001-105.3.3 for Indefinite Termination: In light of flurry of emails regarding TPs "denying" a DNR Termination, in review of standard 105.3.1.4 of these standards and comparing with Exhibit 101, there does seem to be an inconsistency between the standard and the state diagram and NCEMC suggests that the OS address the inconsistency. In addition, the absence of the step “deficiency” in the Indefinite Termination process results in an inconsistency with the FERC ruling that terminations should not be refused given a customer’s attempt to submit a valid and complete request. The Temporary Termination process provides opportunity for a Customer submitting such a request an added step to rectify any shortfalls in meeting the TP’s criteria for a “valid and complete” request while the Indefinite Termination does not offer such a provision to the Customer. NCEMC suggests that the same steps for Temporary and Indefinite Terminations should be afforded the Customer attempting to meet a TPs criteria for a “valid and complete” request for either type of termination. There would still remain differences, mainly the Re-Attestation requirement for Temporary Termination, but by having the same steps for each Termination process, this may serve in our opinion to eliminate potential issues triggered by any differences or interpretations of the standard versus what the FERC intended in its orders associated with terminations.

Page 24, 001-105.3.2.4.1.2: Either remove “not” before “insufficient” or remove “in” in “insufficient”. Otherwise, the standard has a double negative and results in the same standard as 001-105.3.2.4.1.1.

Page 26, 001-105.3.2.6.2: Change standard after the parenthetical to read as follows:
“the Transmission Provider shall update the status of all associated requests of the request for temporary termination of DNR to ACCEPTED or CR\_ACCEPTED.”

Page 28, 001-105.4.1.1.1: It was stated during the Review Session that each TP is allowed discretion within this standard and its associated data structures to decide how granular it would require Network Customers to provide Network Load for its entire demand. One TP may require only new POR/POD loads while another TP may not require such a modification in Network Load and include this as a part of the load forecast. As a Network Customer on multiple systems, NCEMC has concerns that this would result in inconsistencies in how it must provide load forecast in either in aggregate internal to a TPs system or for each of its Delivery Points served by each of these Transmission Providers. NCEMC suggest that at a minimum, a TP should be required to post within WEQ-001-13.1.4 to what level of granularity it will require Network Customers in providing its Network Load Forecast should this be more granular or different than its current practice in submitting load forecasts by Network Customers.

**Attachment 3 – WEQ-002:**

Page 20, 002-5.10.1, last two paragraphs: During the Review Session, it was reported that any and all NITS agreements and DNRs would have to be completely replaced or converted with a new NITS Application and unique identifier with corresponding new DNRs, and other data as required as associated with this new NITS Application. These paragraphs summarize that conversion but do not specify to what extent a Network Customer may and/or will be involved in this conversion effort. NCEMC also assumes that any PTP request required supporting any DNR, the Auxiliary Transmission for the DNR(s) would also need to be replaced with new PTP requests (maybe). NCEMC has major concerns about this conversion in that there is the possibility that gaps may exist such that it loses its ability to manage DNRs or schedule network transaction using its network scheduling rights or other tagging mechanism to reliably serve load in multiple areas given that each TP may have different approaches to the conversion process. NCEMC encourages NAESB to hold transition webinars similarly to what it is doing for transition from NERC TSIN to the EIR to provide “how to” training such that this conversion is consistent among all Transmission Providers and all Network Customers of those TPs for each region as practical. NCEMC also suggests that all Transmission Providers must communicate such transition on their OASIS via an OASIS posting to notify its Network Customers within its area well in advance as to when this conversion is to take place. There should also be an overlap, if possible, for use of the 1.6 and 2.0 data structures to minimize potential gaps of existing network and PTP service provided to NITS customers during the conversion process.

Page 84, 002-101.3.2.14, 3rd paragraph, 1st sentence: Replace “WEQ-001-xx” with “WEQ-001-23”.

Page 86, 002-101.3.2.15, 3rd and 5th paragraphs: It is not clear to NCEMC why “the capacity to be terminated must be supplied as a negative valued integer MW quantity…” when “the amount of capacity terminated over time for the DNR shall be subtracted from the total DNR capacity amount designated…”. This seems to be counter-intuitive to the concept of termination. Can’t the software actually handle the subtraction? Please explain, clarify or modify standard.

Page 89, 002-101.3.2.17, 3rd and 4th paragraphs: It is not clear to NCEMC why “the capacity to be terminated must be supplied as a negative valued integer MW quantity… “ when “the amount of capacity terminated over time for the DNR shall be subtracted from the total DNR capacity amount designated…”. This seems to be counter-intuitive to the concept of termination. Can’t the software actually handle the subtraction? Please explain, clarify or modify standard.

002-101 – Within the 002-101 standards, it is not clear what Data Elements for NITS will be required to be masked and which will not be masked. Earlier versions of WEQ-002 changes for NITS on OASIS included tables showing which elements would be masked or not. NCEMC requests that a table or column be added within 002-101 standards specifying which Data Elements will be masked and which are not given the sensitivity of some data fields provided. The masking table can be provided in WEQ-003 should that be more convenient.

**Attachment 4 – WEQ-003:**

See 002-101 comments above about adding a table specifying which Data Elements are masked or not.

**Attachment 5 – WEQ-013:**

Page 5, 013-101.4, Exhibit 101 - Status Diagram for NITS Application & Modification of Service Processes: In light of flurry of emails regarding TPs "denying" a DNR Termination, in review of standard 105.3.1.4 and comparing it to Exhibit 101, there seems to be an inconsistency between the standard and the state diagram and would suggest that these be made consistent either by adding a statement to the standard or modifying state diagram.

Page 7, 013-101.7, last paragraph before 013-102: As a Network Customer in multiple areas though, NCEMC has a major concern with this standard as currently proposed. NCEMC wants to make sure that whatever actions are taken place by the Transmission Providers involved will continue to be transparent and provide a decent level of information as to what happened when a request is not accepted. As currently written, NCEMC could enter a coordinated transmission request, say from Southern to PJM (hypothetically speaking), and it could be declined and the reason just stated as “No ATC available” or “Flow gate constraints”, and we’d have no idea whether the issue was in any of the areas the request passed through or somewhere else (and the TP would not be required to provide anything more than that). We would like to see more specifics around the level of information provided when a request is not accepted/refused or declined. If this is a continuous and repeated short-term event due to forced outages beyond the control of the TP, or due to loop-flow issues or adjacent system outages causing such constraints on interfaces, versus a long-term issue potentially affecting resource adequacy for multiple LSEs and Transmission Customers, then it should be transparent to those adversely affected. Network Customers are not always aware of coordinated efforts being made in short-term horizons by the TPs involved to rectify the constraining facility until TLR curtailments are affecting transactions that are supporting network service.

Page 36, 013-105.2.2 in conjunction with comments provided on 001-105.3.1.4, last sentences of 2nd and 3rd paragraphs: NCEMC suggests removing the parenthetical “(temporary termination only)” in both paragraphs to indicate the DEFICIENT processing is to be done for both Temporary and Indefinite Termination.