

**Quadrant:** Wholesale Electric Quadrant  
**Comment Request:** WEQ 2009 Annual Plan  
**Submitted By:** Ed Skiba for Midwest ISO  
**Date:** January 16, 2009

---

The Midwest ISO has reviewed the draft WEQ 2009 Annual Plan revised as of December 22, 2008, and would like to offer the following comments for consideration.

1. We would recommend item “1.a. Make changes to business practices as related to inclusion of the NERC Reliability Functional Model entities as NERC undertakes the same efforts” be removed as an annual plan item.

**Explanation for recommendation:**

This item has been listed since the WEQ 2005 Annual Plan was approved December 9, 2004. Rather than having an activity listed that is not associated with any planned work, we suggest the item be deleted. In the event work is requested, add an annual plan item for the specific work to be performed.

2. We would recommend that Provisional Item “2 Develop business practice standards as requested by the regional and state advisory groups” be removed from the list of Provisional Items.

**Explanation for recommendation:**

There are no specific business practice standards being requested by regional and state advisory groups at this time. If and when there are specific standards requested, the requests should be included as either specific line items in the 2009 work plan or provisional items to be scheduled at a future date. It is unclear as to the value of having this provisional line item in the plan.

3. We would recommend removing Provisional Item “4 Develop and/or maintain business practice standards to support gas-electric interdependencies
  - Respond to requests as received that are related to Docket No. RM05-28-000.
  - Respond to directives related to the conclusions of the NAESB reports submitted in FERC Order No. 698, Docket Nos. RM05-5-001 and RM96-1-027.”

**Explanation for recommendation:**

There are no specific requests or directives at this time. If and when there are specific requests and/or directives the items should be added as specific line items in the 2009 work plan or provisional items to be schedule at a future date. It is unclear as to the value of having this provisional line item in the plan.

4. We would recommend having those subcommittees, working groups, and NAESB staff review the Completion Dates that are assigned in the draft plan and take a hard look at the dates and determine what they reasonably expect to complete in 2009. Any items that cannot be completed in 2009 should be moved to provisional items.

**Explanation for recommendation:**

Attached is a review of the completion dates in the draft 2009 to what has been approved by the Board in previous Annual Plans (see highlights). Some of the items had original completion dates in 2006. Rather than prioritizing what needs to be done this year everything appears to be a high priority. Having an unattainable annual plan is a disincentive to the subcommittees and working groups. When people feel they have achievable goals, they will work to meet those goals. Being successful is a great motivator. If people know from the outset they cannot meet their goals, there is little to no incentive to meet any of the milestones (annual plan items).