North American Energy Standards Board

1301 Fannin, Suite 2350, Houston, Texas 77002
Phone: (713) 356-0060, Fax: (713) 356-0067, E-mail: naesb@naesb.org
Home Page: www.naesb.org

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ EXECUTIVE COMMITTEE MEETING MATERIALS ASSEMBLED

Tuesday, May 12, 2009 – 10:00 am to 4:00 pm

ACES Power, Carmel, IN

North American Energy Standards Board

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NORTH AMERICAN ENERGY STANDARDS BOARD WEQ EXECUTIVE COMMITTEE MEETING

Tuesday, May 12, 2009 – 10:00 am to 4:00 pm E, ACES Power, Carmel, IN

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1.	Welcome		
	• Antitrust Guidelines	Antitrust Statement	1
	• Welcome to members and attendees		
	• Quorum Establishment: Roll Call of WEQ EC Members and Alternates: http://www.naesb.org/pdf4/ec_terms.pdf (EC) and http://www.naesb.org/pdf4/alt_ec_members.pdf (EC Alt)	EC Terms EC Alternate Terms	2 7
	• Adoption of WEQ Agenda (simple majority) http://www.naesb.org/pdf4/ec051209a.doc	Agenda	12
2.	Wholesale Electric Quadrant Draft Minutes (simple majority to approve)		

	• Adoption of the WEQ EC Meeting Minutes:
	  • January 27, 2009: http://www.naesb.org/pdf4/weq_ec012709dm.doc
	  • February 3, 2009: http://www.naesb.org/pdf4/weq_ec020309dm.doc
		1-27-09 Draft Minutes
		2-3-09 Draft Minutes
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3.	Review and vote on 2008 WEQ Annual Plan Item 6.h/R06006 - "Develop standards to allow for registered Market Operators to request changes to the Market Level profile of Implemented Interchange" - NO ACTION TO BE TAKEN: (simple-majority vote)		
	• Recommendation: http://www.naesb.org/pdf4/weq_2008_api_6h_r06006_rec.doc	Recommendation	37
	• Comments due March 2, 2009:		
	Entergy: http://www.naesb.org/pdf4/weq_013009_entergy.doc	Entergy Comments	39
4.	Review and vote on 2009 WEQ Annual Plan Item 3.d - "FERC Order No. 717 Standards of Conduct": (super-majority vote)		
	• Recommendation: http://www.naesb.org/pdf4/weq_2009_ap_3d_rec.doc	Recommendation	40
	• Comments due April 27, 2009:		
	Entergy: http://www.naesb.org/pdf4/weq_032709_entergy.doc.	Entergy Comments	57
	SRS Comments: http://www.naesb.org/pdf4/weq_032709_srs.doc	SRS Comments	74
	Duke Energy: http://www.naesb.org/pdf4/weq_032709_duke_energy.doc	Duke Comments	75
	Southern Company: http://www.naesb.org/pdf4/weq_032709_southern.doc	Southern Company Comments	76

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5.	Review and discuss 2009 WEQ Annual Plan Item 2.a.ii.3 – "Rollover Rights on Redirect on a Firm Basis"		
	• Recommendation: http://www.naesb.org/pdf4/weq_2009_api_2aii3_rec.doc	Recommendation	93
	• **Comments due May 13, 2009**: this agenda item is for discussion only. A separate WEQ EC conference call will be scheduled to address the recommended standards.		
6.	Review and discuss 2009 WEQ Annual Plan Item 6.a.2/R08004 – "WEQ-011 Consistency changes to include Introduction and Applicability sections"		
	• Recommendation: http://www.naesb.org/pdf4/weq_2009_api_6a2_r08004_rec.doc	Recommendation	161
	• **Comments due May 13, 2009:** this agenda item is for discussion only. A separate WEQ EC conference call will be scheduled to address the recommended standards.		
	Midwest ISO: http://www.naesb.org/pdf4/weq_041309_bps_miso.pdf	Midwest ISO Comments	164
7.	Discuss and determine disposition of 2008 WEQ Annual Plan Item 6.b/R07020 – Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control		
	• Recommendation Revised on February 3, 2009: http://naesb.org/pdf4/weq_ec020309a4.doc	Recommendation	165
	The recommendation failed to achieve a super-majority on February 23, 2009 through notational balloting.		
8.	Discuss and vote (simple majority) in minor corrections:		
	• Minor Correction submitted by JISWG on February 2, 2009: http://www.naesb.org/pdf4/weq_ec051209w1.doc	Minor Correction from JISWG	175
	• Minor Correction submitted by NAESB Staff on February 27, 2009: http://www.naesb.org/pdf4/weq_ec051209w2.doc	Minor Correction from NAESB	176
	• Minor Correction Submitted by Midwest ISO on March 3, 2009: http://www.naesb.org/pdf4/weq_ec051209w3.pdf	Minor Correction from Midwest ISO	177
9.	Review and vote on recommendation from leadership of ESS/ITS and JISWG (simple majority vote):		
	• Recommendation Submitted on March 27, 2009: http://www.naesb.org/misc/weq_subcommittee_restructure_recommendation_032709.doc	Recommendation	179

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10.	Subcommittee Updates (meeting materials for updates will be provided by leadership as they are available):		
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	• Business Practices Subcommittee (BPS): http://www.naesb.org/pdf4/weq_ec051209w5.ppt	BPS Presentation	192
	◦ TLR		
	◦ Time Inadvertent Management Task Force		
	• DSM-EE Subcommittee		
	• Electronic Scheduling (ESS) and Information Technology (ITS) Subcommittees: http://www.naesb.org/pdf4/weq_ess_its041309progress_report.xls (Progress Report), http://www.naesb.org/pdf4/order890_021109_naesb_workplan_clean.doc (Order No. 890 Work Plan)	Progress Report Order No. 890 Plan	198 199
	• Joint Interchange Scheduling Working Group (JISWG)		
	• Standards Review Subcommittee (SRS): http://www.naesb.org/pdf4/weq_ec051209w4.ppt	Presentation	233
	• Glossary Efforts		
11.	Discussion on tools/certification process to support industry compliance of NAESB WEQ standards (if action is taken to modify the 2009 annual plan, a simple majority vote is needed)		
12.	Review, discuss, identify changes and vote to approve changes to the 2009 Annual Plan to be proposed to the Board of Directors: http://www.naesb.org/pdf4/draft_weq_2009_annual_plan.doc (simple majority vote for EC endorsement of proposed changes to be forwarded for Board approval)	2009 Annual Plan	237

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13.	Board of Directors, Board Committee and Regulatory Updates (no votes or action to be taken):		
	• Board Updates - http://www.naesb.org/pdf4/bd032609dm.doc (March 26, 2009)	Board 3-26-09 Minutes	247
	• Wholesale Gas and Retail key activities – WGQ Annual Plan, Retail Annual Plan - http://www.naesb.org/pdf4/draft_wgq_2009_annual_plan.doc (WGQ), http://www.naesb.org/pdf4/draft_retail_2009_annual_plan.doc (Retail)	WGQ 2009 Annual Plan Retail 2009 Annual Plan	255 260
	• Update on Board Retail Structure Review Committee efforts – http://www.naesb.org/pdf4/rsrc011509w2.doc	Retail Restructuring Report	266
	• FERC Efforts: • WEQ 2.1 Filing on March 12, 2009 - http://www.naesb.org/pdf4/ferc031209_naesb_weq_version_002.1_supplemental_filing.pdf, • DSM-EE Filing on April 17, 2009 - http://www.naesb.org/pdf4/ferc041709_dsm_filing.pdf, and • FERC NOI on Smart Grid Action Plan on March 19, 2009 - http://www.naesb.org/pdf4/ferc031909_smart_grid_noi.pdf	NAESB WEQ 2.1 Report NAESB DSM Report FERC NOI	268 272 319
14.	Other Business	2009 Calendar	362
15.	Adjourn		

Attire – Business Casual

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NAESB ANTITRUST GUIDELINES STATEMENT

ANTITRUST GUIDELINES

- The following guidelines will be reviewed by counsel at the meeting. The meeting will be monitored, transcribed, and minutes will the taken. The guidelines are as follows:

Antitrust guidelines direct meeting participants to avoid discussion of topics or behavior that would result in anticompetitive behavior including: restraint of trade and conspiracies to monopolize, unfair or deceptive business acts or practices, price discriminations, division of markets, allocation of production, imposition of boycotts, and exclusive dealing arrangements.

Any views, opinions or positions presented or discussed by meeting participants are the views of the individual meeting participants and their organizations. Any such views, opinions or positions are not the views, positions or opinions of NAESB, the NAESB Board of Directors, or any NAESB Committee or Subcommittee, unless specifically noted otherwise.

As it is not the purpose of the meeting to discuss any antitrust topics, if anyone believes we are straying into improper areas, please let us know and we will redirect the conversation.

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NORTH AMERICAN ENERGY STANDARDS BOARD
2009 EXECUTIVE COMMITTEE TERMS – Wholesale Gas Quadrant

PRODUCERS SEGMENT		**TERM END:**
Jim Busch	Director of Energy Policy and Regulation, BP Energy Company	12-31-2010
Pete Frost	Director – Regulatory Affairs, ConocoPhillips Gas and Power Marketing	12-31-2010
Chuck Cook	Manager - Regulatory Affairs, Chevron	12-31-2009
Richard D. Smith	Regulatory & Compliance Manager, Noble Energy, Inc.	12-31-2009
Mike Shepard	General Counsel, Mewbourne Oil Company	12-31-2009
PIPELINE SEGMENT		
Bill Griffith	Consultant, El Paso Natural Gas Company	12-31-2011
Kathryn Burch	Project Manager, Standards and Regulatory, Spectra Energy Transmission	12-31-2011
Dale Davis	Consultant, Williams Gas Pipeline	12-31-2010
Randy Young	Vice President - Regulatory Compliance and Corporate Services, Boardwalk Pipeline Partners, LP	12-31-2009
Kim Van Pelt	Regulatory Compliance Manager, Panhandle Eastern Pipe Line	12-31-2009
LOCAL DISTRIBUTION COMPANY (LDC) SEGMENT		
Rodger Schwecke	Director – Energy Markets and Capacity Products, Sempra Energy - Southern California Gas	12-31-2011
V A C A N C Y		12-31-2011
Paul Buckley	Director of Rates and Regulatory Affairs, Washington Gas	12-31-2010
Mike Novak	Assistant General Manager, National Fuel Gas Distribution	12-31-2009
Craig Colombo	Energy Trader III, Dominion Resources	12-31-2009
END USERS SEGMENT		
Kelly Daly	Partner, Stinson Morrison Hecker, LLP (rep. Arizona Public Service Company)	12-31-2010
Valerie Crockett	Senior Energy Markets & Policy Specialist, Tennessee Valley Authority	12-31-2010
Lori-Lynn C. Pennock	Senior Fuel Supply Analyst, Salt River Project	12-31-2009
Dona Gussow	Manager, Contract Administration, Florida Power and Light Company	12-31-2009
Tina Burnett	Natural Gas Operations Administrator, The Boeing Company	12-31-2009
SERVICES SEGMENT		
Steve Abbey	Manager of Regulatory Affairs in the Marketing Department of Anadarko	12-31-2010
Lisa Simpkins	Vice President, Energy Policy – Natural Gas, Constellation Energy Commodities Group	12-31-2010
Leigh Spangler	CEO, Latitude Technologies, Inc.	12-31-2009
Jim Buccigross	Vice President, 8760 Inc.	12-31-2009
Jeff Jarvis	Senior Counsel, EnCana Marketing (USA), Inc.	12-31-2009

EXECUTIVE COMMITTEE OFFICERS: Jim Buccigross is WGQ chairman of the Executive Committee, Mike Novak is WGQ vice chairman; Mike Novak is the RGQ chairman, Ruth Kiselewich is the REQ chairman, Kathy York is the WEQ chairman and Matt Goldberg is the WEQ vice chairman.

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2009 EXECUTIVE COMMITTEE TERMS – Retail Electric Quadrant

SUPPLIERS SEGMENT		**TERM END:**
Bill Barkas	Manager of Retail State Government Relations, Dominion Retail, Inc.	12-31-2009
V A C A N C Y		12-31-2009
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2010
DISTRIBUTORS SEGMENT		
Ruth Kiselewich	Director, Demand Side Management Programs, Baltimore Gas & Electric Company	12-31-2009
Patrick Eynon	Supervisor – Retail Access, Ameren Services	12-31-2009
Judy Ray	Industrial Segment Manager – Contract Administrator, Alabama Power Company	12-31-2010
Mary Edwards	Senior Customer Choice Analyst – Regulation and Competition, Dominion Virginia Power	12-31-2010
END USERS SEGMENT		
V A C A N C Y		12-31-2009
V A C A N C Y		12-31-2009
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2010
SERVICE PROVIDERS SEGMENT		
Jim Minneman	Controller, PPL Solutions, LLC	12-31-2009
Jennifer Teel	Director – Business Solutions, EC Power	12-31-2009
Susan Munson	ERCOT Retail Market Liaison, Electric Reliability Council of Texas (ERCOT)	12-31-2010
V A C A N C Y		12-31-2010

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2009 EXECUTIVE COMMITTEE TERMS – Wholesale Electric Quadrant

TRANSMISSION SEGMENT		**TERM END:**	**SUBSEGMENT:**
Patrick McGovern	Manager - System Services, Georgia Transmission Corporation	12-31-2009	Muni/Coop
Wendy D. Weathers	System Operations, Salt River Project	12-31-2010	Fed/State/Prov.
Daryl McGee	Manager – Transmission Services, Southern Company Services	12-31-2010	IOU
Edward Davis	Policy Consultant, Entergy Services, Inc.	12-31-2009	IOU
Mark Hackney	Section Leader of Transmission Services Trading, Arizona Public Service	12-31-2010	at large
Bob Harshbarger	OASIS Trading Manager, Puget Sound Energy	12-31-2009	at large
Michelle Mizumori	Market Interface Manager, Western Electricity Coordinating Council (WECC)	12-31-2009	At-Large
GENERATION SEGMENT			
William J. Gallagher	Special Contracts Chief, Vermont Public Power Supply Authority	12-31-2009	Muni/Coop
Kathy York	Sr. Energy Markets & Policy Specialist, Tennessee Valley Authority	12-31-2010	Fed/State/Prov.
Jalal Babik	Manager – Electric Policy, Dominion Resource Services, Inc.	12-31-2010	IOU
John Ciza	Project Manager Energy Policy and Regulatory Affairs, Southern Company Services	12-31-2009	IOU
Ron Mucci	Consultant, Representing Entegra Power Group LLC	12-31-2010	Merchant
Trent Carlson	Vice President – Regulatory Affairs, Reliant Energy Services	12-31-2009	at large
Neal Balu	Director of Transmission Policy, Wisconsin Public Service Corporation	12-31-2009	at large
MARKETERS/BROKERS SEGMENT			
Mack Thompson	Vice President – Power Supply Services, American Municipal Power – Ohio, Inc.	12-31-2010	Muni/Coop
Belinda Thornton	General Manager - Energy Origination, Tennessee Valley Authority	12-31-2009	Fed/State/Prov.
V A C A N C Y		12-31-2010	at large
Richard Lehman	Supply and Trading, Salt River Project	12-31-2009	at large
John Apperson	Director – Commercial and Trading, PacifiCorp Energy	12-31-2010	IOU
Roy True	Manager of Regulatory and Markets Development, ACES Power Marketing	12-31-2009	at large
Barry Green	Barry Green Consulting (representing Electric Power Supply Association (EPSA))	12-31-2009	at large

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DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT		TERM END:	SUBSEGMENT:
Ray Phillips	Manager of Compliance and Special Projects, Alabama Municipal Electric Authority	12-31-2010	Muni/Coop
V A C A N C Y		12-31-2009	at large
Alan Pritchard	Senior Engineer, Duke Energy Corporation	12-31-2010	IOU
Jeffrey C. Mueller	Manager - ERO / RE Policy and Standards Interface, Public Service Electric and Gas Company	12-31-2009	IOU
Robert Martinko	Consultant FERC Compliance, FirstEnergy Service Company	12-31-2010	at large
Syd Berwager	Industry Restructuring Project Manager, Bonneville Power Administration/Power Business Line	12-31-2009	Other
Andy Rodriquez	Manager of Business Practice Coordination, NERC	12-31-2009	At-Large
END USERS SEGMENT			
V A C A N C Y		12-31-2009	at large
Aaron Breidenbaugh	Senior Manager - Regulatory Affairs and Public Policy - New York, EnerNOC, Inc.	12-31-2010	at large
Lou Ann Westerfield	Policy Strategist, Idaho Public Utilities Commission, rep. National Association of Regulatory Utility Commissioners	12-31-2010	Regulator
V A C A N C Y		12-31-2009	at large
V A C A N C Y		12-31-2010	at large
V A C A N C Y		12-31-2009	at large
Paul Sorenson	Director-Central Markets Strategy, Open Access Technology International, Inc.	12-31-2009	At-Large
INDEPENDENT GRID OPERATORS/PLANNERS			
Thomas Bowe	Executive Director – Reliability Integration, PJM Interconnection, LLC	12-31-2010	
Jim Castle	Manager, Grid Operations, New York Independent System Operator, Inc.	12-31-2010	
Matt Goldberg	Director Reliability & Operations Compliance ISO New England, Inc.	12-31-2010	
Anjali Sheffrin	Director Market and Product Development and Chief Economist, California ISO	12-31-2010	
Joel Mickey	Manager Market Operations Support, Electric Reliability Council of Texas	12-31-2009	
Ed Skiba	Technical Manager, Standards Compliance & Strategy, Midwest ISO	12-31-2009	
Charles Yeung	Executive Director Interregional Affairs, Southwest Power Pool	12-31-2009	

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2009 EXECUTIVE COMMITTEE TERMS – Retail Gas Quadrant

SUPPLIERS SEGMENT		**TERM END:**
V A C A N C Y		12-31-2009
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2009
Richard Zollars	Director, Data and Billing, Dominion Retail, Inc.	12-31-2010
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2009
DISTRIBUTORS SEGMENT		
Dan Jones	Supervisor, Certified Supplier Business Center, Duke Energy	12-31-2009
V A C A N C Y		12-31-2009
Leslie H. Nishida	Manager Gas Regulatory Services, Wisconsin Public Service Corporation	12-31-2009
Michael Novak	Assistant General Manager, National Fuel Gas Distribution Corporation	12-31-2010
V A C A N C Y		12-31-2010
Phil Precht	Management Consultant, Pricing & Regulatory Services Department, Baltimore Gas and Electric Company	12-31-2010
END USERS SEGMENT		
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2009
V A C A N C Y		12-31-2009
V A C A N C Y		12-31-2009
SERVICE PROVIDERS SEGMENT		
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2010
V A C A N C Y		12-31-2009
V A C A N C Y		12-31-2009
V A C A N C Y		12-31-2009

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2009 EXECUTIVE COMMITTEE ALTERNATES – Wholesale Gas Quadrant

END USER SEGMENT	
Paul A. Jones	Senior Marketing Representative, Salt River Project
Art Morris	Gas Originator, Florida Power & Light Company
Kenneth Nordlander	Fuel Procurement, Arizona Public Service Company
Katherine C. Zeitlin	Legal Department, Arizona Public Service Company
DISTRIBUTION SEGMENT	
Rick Ishikawa	Interconnect Account Manager in Capacity Products Group, Southern California Gas Company
Phil Precht	Management Consultant, Pricing and Regulatory Services Department, Baltimore Gas and Electric Company
Donald Petersen	Senior Gas Resource Analyst, Pacific Gas and Electric Company
Jim Blasiak	Specialist Federal Regulatory Affairs, Washington Gas Light Company
George Simmons	FERC Specialist, NiSource Inc.
Scott Butler	Project Manager, Energy Markets Policy Group, Consolidated Edison Company of New York, Inc.
PIPELINE SEGMENT	
Bill Grygar	Vice President, Panhandle Eastern Pipe Line
Scott Hansen	Questar Pipeline Company
Iris King	Director, Technical and Marketing Support, Dominion Transmission, Inc.
Paul Love	Director, Electronic Customer Services, Natural Gas Pipe Line Company of America
Mark Gracey	Consultant, Tennessee Gas Pipeline Company
Christopher Burden	Consultant e-Commerce & Service Delivery, Williams Gas Pipeline
Tom Gwilliam	Iroquois Gas Transmission System
PRODUCER SEGMENT	
David Ogden	Manager, Marketing Administration, Dominion Exploration & Production, Inc.
Rhonda Denton	Regulatory Affairs, BP Energy Company
SERVICES SEGMENT	
Keith Sappenfield	Director, US Regulatory Affairs, Midstream and Marketing, EnCana Oil and Gas (USA), Inc.

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DISTRIBUTION SEGMENT	
Keith P. Hock	Director ARES Business Center, Ameren Services Company
Ripley Newcomb	Manager – Conservation and Load Management Program, Dominion
William J. Welzant	Principal Supplier Services Analyst, Supplier Account Management, Baltimore Gas and Electric
END USER SEGMENT	
SERVICES SEGMENT	
SUPPLIER SEGMENT	

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END USER SEGMENT		**SUB-SEGMENT**
Robert Schwermann	Manager – Customer Care, Open Access Technology International, Inc.	At-Large
DISTRIBUTION/LSE SEGMENT		**SUB-SEGMENT**
Gerry Adamski	Vice President of Standards, NERC	At-Large
Lee Hall	Coordination Manager – Power Services, Bonneville Power Administration	Other
GENERATION SEGMENT		**SUB-SEGMENT**
Joel Dison	Project Manager, Southern Company Generation and Energy Marketing	IOU
Lou Oberski	Director – Electric Market Policy, Dominion Resources Services, Inc	IOU
Francis Halpin	Bonneville Power Administration	Fed/State/Prov.
MARKETER/BROKER SEGMENT		**SUB-SEGMENT**
Jeff Ackerman	Manager, CRSP-Energy Mgmt., Western Area Power Administration	Fed/State/Prov
Brenda Anderson	Bonneville Power Administration	Fed/State/Prov
Valerie Crockett	Energy Markets & Policy Specialist, Tennessee Valley Authority	Fed/State/Prov
TRANSMISSION SEGMENT		**SUB-SEGMENT**
Barbara Rehman	Policy Development & Analysis, Bonneville Power Administration	Fed/State/Prov.
Tim Ponseti	Tennessee Valley Authority	Fed/State/Prov.
Chuck Feagans	Tennessee Valley Authority	Fed/State/Prov.
Bob McKee	American Transmission Company	ITC
Brian Weber	Manager – Transmission Strategy and Policy, PacifiCorp	IOU
Shay Labray	Transmission Strategy Consultant, PacifiCorp	IOU
Jane Daly	Rate & Regulatory Advisor, Arizona Public Service Company	IOU
Marceline Otondo	Regulatory Compliance Advisory, Arizona Public Service Company	IOU
Narinder Saini	Policy Consultant, Entergy Services, Inc.	IOU
J.T. Wood	Southern Company Services	IOU
W. Shannon Black	Market Issues and Standards Processes Manager, Western Electricity Coordinating Council	at large

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INDEPENDENT GRID OPERATORS/PLANNERS SEGMENT		SUB-SEGMENT
Brent Kingsford	Sr. Operations Regulatory Specialist, California ISO (CAISO)	
Paul Wattles	Supervisor Demand Side Programs, Electric Reliability Council of Texas (ERCOT)	
Bill Blevins	Sr. Market Support Analyst, Electric Reliability Council of Texas (ERCOT)	
Robert Coughlin	Principal Scientist Reliability & Operations Compliance, ISO New England, Inc.	
Cheryl Mendrala	Principal Engineer, ISO New England, Inc.	
Brian Pedersen	Manager Transmission Services, Midwest ISO	
Jason Marshall	Technical Manager, Midwest ISO	
Dean Hartung	Manager Real Time Market Operations, PJM Interconnection, LLC	
Cathy Wesley	Sr. Analyst, PJM Interconnection, LLC	
Carl Monroe	Sr. Vice President Operations & Chief Operating Officer, Southwest Power Pool	
Greg Campoli	Supervisor – Reliability Compliance and Assessment, New York ISO	
Diana Pommen	Director Interjurisdictional Affairs, Alberta Electric System Operator	
Jimmy Womack	Manager-Tariff Administration, Southwest Power Pool	
Shucheng Liu	Ph.D., Principal Market Developer, California ISO (CAISO)	
Terry Bilke	Director Standards Compliance and Strategy, Midwest ISO	

North American Energy Standards Board

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NORTH AMERICAN ENERGY STANDARDS BOARD
2009 EXECUTIVE COMMITTEE ALTERNATES – Retail Gas Quadrant

DISTRIBUTORS SEGMENT	
Joe Stengel	Manager, Federal Regulatory Affairs, Philadelphia Gas Works
Mike McShane	Program Leader, Gas Choice Programs, Baltimore Gas and Electric Company
END USERS SEGMENT	
SERVICE PROVIDERS SEGMENT	
SUPPLIER SEGMENT	
Paul Cherevka	Project Manager Data Warehouse, Dominion Retail

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April 23, 2009

TO: NAESB Quadrant Executive Committee Members, Alternates and Interested Industry Participants

FROM: Rae McQuade, NAESB President

RE: Quadrant Executive Committee Meeting Announcements and Draft Agendas with links to Meeting Materials – Revised Start Time for WGQ EC, Updated Links

NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETINGS
Hosted by ACES Power in Carmel, IN

First, let me thank Roy True and ACES Power for their generosity and commitment to the NAESB organization through hosting this series of meetings. Without such support, it would be very difficult to maintain the NAESB budget and provide various locations around the country to NAESB in-person attendance meetings.

As we have announced at prior Executive Committee meetings, meeting announcements and in other communications, the Executive Committee (EC) will meet in Carmel, IN on May 12-14 hosted by ACES Power. Below are the meeting arrangements:

Where:	ACES Power, 4140 West 99th Street, Carmel, IN 46032
Contact:	Veronica Thomason, 713-356-0060
When:	Tuesday, May 12 -- 10:00 a.m. to 4:00 p.m. Eastern – Wholesale Electric Quadrant
	Wednesday, May 13[1] -- 10:00 a.m. to 4:00 p.m. Eastern – Retail Gas/Electric Quadrant
	Thursday, May 14 -- 9:00 a.m. to 3:00 p.m. Eastern – Wholesale Gas Quadrant

If you plan to attend any of the above EC meetings and have not already RSVPed to our office through the other announcements, please do so at your earliest convenience to the NAESB office (naesb@naesb.org) so that proper meeting arrangements can be made by NAESB and our host. Hotel information is posted on the NAESB web site on the EC pages and can be directly accessed from the following link: http://www.naesb.org/pdf4/ec051209ma2.doc. Travel information from Indianapolis is posted on the NAESB web site on the EC pages and can be directly accessed from the following link: http://www.naesb.org/pdf4/ec051209ma1.pdf. If you plan to participate by conference call, please contact the NAESB Office (713-356-0060 or naesb@naesb.org) to obtain the calling number and pass code. The EC meetings will be web cast as well. The meeting, conference calling and web casting is open to any interested party.

The materials for the meeting will be emailed to the participants and posted on the web site shortly. In an effort to control costs and be more environmentally aware, we are not printing Executive Committee books any longer although they will be posted in an assembled pdf document for each quadrant meeting, in addition to the links to the native formatted documents provided in the agendas. For agenda items where materials are already available and have been sent to you in prior communications, or posted on the web site, the links to those documents are included in the agenda for your convenience, and to help you prepare for the meetings. The links are formatted in blue underlined text. As the meeting approaches, this agenda with additional links to documents will be provided, along with the pdf assembled books.

Please note that in discussions with the Retail Quadrants EC chairs and vice chairs, it has been determined that all Retail EC meetings for 2009 will be conference call/web casts in recognition of the small number of in-person attendance from the 2008 records, and also in recognition of the reduced travel budgets for 2009 of many of the Retail EC members. However, since NAESB staff will be on location to provide support for the retail EC meetings, any Retail EC participant may choose to join the staff and participate in-person.

[1] The retail EC meetings for 2009 are all scheduled as web casts/conference calls, but NAESB staff will administer the meetings from the locations for the WEQ and WGQ EC meetings. Participants should feel free to join the NAESB staff in Carmel if they are in Carmel for the other meetings.

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As always, the chair reserves the right to extend the time of the meeting to ensure that agenda items are addressed. The times indicated on the agenda will be followed to ensure that agenda items are allotted appropriate time slots. Should an agenda item conclude earlier than its stated time slot, the remaining time could be allotted to other agenda items at the discretion of the chair.

There are other NAESB subcommittee meetings being held in conjunction with the EC meetings. They are held in various locations, and available via conference call and web cast for WEQ JISWG meetings, and upon advance request[2] for WGQ Joint IR/Technical subcommittee meetings. The details are:

Date	Time	Meeting/Location
Tues, May 12	10 am to 4 pm EC	WEQ EC Meeting/ ACES Power, Carmel – Board Room Conference Call Number: 866-740-1260 Access Code: 3560060 Security Code: 6862 Web Cast: http://www.readytalk.com (please use same codes)
	9 am to 4 pm E	WGQ Joint IR/Technical (day one)/ ACES Power, Carmel – Conference Room F
Wed, May 13	10 am to 4 pm E	Retail EC Meeting by phone/web cast/ for in person attendance, please join NAESB staff at ACES Power, Carmel -- Board Room Conference Call Number: 866-740-1260 Access Code: : 3560060 Security Code: 7318 Web Cast: http://www.readytalk.com (please use same codes)
	9 am to 4 pm E	WGQ Joint IR/Technical (day two)/ ACES Power, Carmel – Conference Room F
	9 am to 5 pm E	WEQ JISWG (day one)/ Midwest ISO, 720 City Center Drive, Carmel, Faraday Room Conference calling and web casting to be set up by Midwest ISO and will be included in the materials for the meeting.
Thu, May 14	9 am to 3 pm E	WGQ EC Meeting/ ACES Power, Carmel - Board Room Conference Call Number: 866-740-1260 Access Code: : 3560060 Security Code: 2843 Web Cast: http://www.readytalk.com (please use same codes)
	9 am to 5 pm E	WEQ JISWG (day two)/ Midwest ISO, 720 City Center Drive, Carmel, Faraday Room Conference calling and web casting to be set up by Midwest ISO and will be included in the materials for the meeting.

[2] To set up phone call in capability for the WGQ IR/Technical meetings requires request from attendees unable to participate in person. The request should be made at least one week prior to the meeting date to ensure adequate time to set up equipment.

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Date	Time	Meeting/Location
Fri, May 14	9 am to Noon E	WEQ JISWG (day three)/ Midwest ISO, 720 City Center Drive, Carmel, Faraday Room Conference calling and web casting to be set up by Midwest ISO and will be included in the materials for the meeting.

You can access the materials for this meeting from the NAESB web site, at the page specific for the subcommittee noted (WEQ: http://www.naesb.org/weq/default.asp and WGQ: http://www.naesb.org/wgq/default.asp,).

Please feel free to call the NAESB office should you have any questions or comments.

Best Regards, *Rae*

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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE ELECTRIC QUADRANT DRAFT AGENDA
Tuesday, May 12, 2009 – 10:00 am to 4:00 pm E
ACES Power, Carmel, IN

#	Agenda Item
1.	Welcome • Antitrust Guidelines • Welcome to members and attendees • Quorum Establishment: Roll Call of WEQ EC Members and Alternates: http://www.naesb.org/pdf4/ec_terms.pdf (EC) and http://www.naesb.org/pdf4/alt_ec_members.pdf (EC Alt) • Adoption of WEQ Agenda (simple majority) http://www.naesb.org/pdf4/ec051209a.doc

2.	Wholesale Electric Quadrant Draft Minutes (simple majority to approve)
	• Adoption of the WEQ EC Meeting Minutes:
	  • January 27, 2009: http://www.naesb.org/pdf4/weq_ec012709dm.doc
	  • February 3, 2009: http://www.naesb.org/pdf4/weq_ec020309dm.doc

3.	Review and vote on 2008 WEQ Annual Plan Item 6.h/R06006 - "Develop standards to allow for registered Market Operators to request changes to the Market Level profile of Implemented Interchange" - NO ACTION TO BE TAKEN: (simple-majority vote) • Recommendation: http://www.naesb.org/pdf4/weq_2008_api_6h_r06006_rec.doc • Comments due March 2, 2009: Entergy: http://www.naesb.org/pdf4/weq_013009_entergy.doc
4.	Review and vote on 2009 WEQ Annual Plan Item 3.d - "FERC Order No. 717 Standards of Conduct": (super-majority vote) • Recommendation: http://www.naesb.org/pdf4/weq_2009_ap_3d_rec.doc • Comments due April 27, 2009: will be posted as they are received and a revised agenda with links will be issued Entergy: http://www.naesb.org/pdf4/weq_032709_entergy.doc. SRS Comments: http://www.naesb.org/pdf4/weq_032709_srs.doc
5.	Review and discuss 2009 WEQ Annual Plan Item 2.a.ii.3 – "Rollover Rights on Redirect on a Firm Basis" • Recommendation: http://www.naesb.org/pdf4/weq_2009_api_2aii3_rec.doc • Comments due May 13, 2009: this agenda item is for discussion only. A separate WEQ EC conference call will be scheduled to address the recommended standards.
6.	Review and discuss 2009 WEQ Annual Plan Item 6.a.2/R08004 – "WEQ-011 Consistency changes to include Introduction and Applicability sections" • Recommendation: http://www.naesb.org/pdf4/weq_2009_api_6a2_r08004_rec.doc • Comments due May 13, 2009: this agenda item is for discussion only. A separate WEQ EC conference call will be scheduled to address the recommended standards.
7.	Discuss and determine disposition of 2008 WEQ Annual Plan Item 6.b/R07020 – Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control • Recommendation Revised on February 3, 2009: http://naesb.org/pdf4/weq_ec020309a4.doc The recommendation failed to achieve a super-majority on February 23, 2009 through notational balloting.
8.	Discuss and vote (simple majority) in minor corrections: • Minor Correction submitted by JISWG on February 2, 2009: http://www.naesb.org/pdf4/weq_ec051209w1.doc • Minor Correction submitted by NAESB Staff on February 27, 2009: http://www.naesb.org/pdf4/weq_ec051209w2.doc • Minor Correction Submitted by Midwest ISO on March 3, 2009: http://www.naesb.org/pdf4/weq_ec051209w3.pdf

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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE ELECTRIC QUADRANT DRAFT AGENDA
Tuesday, May 12, 2009 – 10:00 am to 4:00 pm E
ACES Power, Carmel, IN

#	Agenda Item
9.	Review and vote on recommendation from leadership of ESS/ITS and JISWG (simple majority vote): • Recommendation Submitted on March 27, 2009: http://www.naesb.org/misc/weq_subcommittee_restructure_recommendation_032709.doc

10.	Subcommittee Updates (meeting materials for updates will be provided by leadership as they are available):
	• Triage Subcommittee: http://www.naesb.org/pdf4/tr040809disposition.doc
	• Business Practices Subcommittee (BPS)
	  • TLR
	  • Time Inadvertent Management Task Force
	• DSM-EE Subcommittee
	• Electronic Scheduling (ESS) and Information Technology (ITS) Subcommittees
	• Joint Interchange Scheduling Working Group (JISWG)
	• Standards Review Subcommittee (SRS)
	• Glossary Efforts

11.	Discussion on tools/certification process to support industry compliance of NAESB WEQ standards (if action is taken to modify the 2009 annual plan, a simple majority vote is needed)
12.	Review, discuss, identify changes and vote to approve changes to the 2009 Annual Plan to be proposed to the Board of Directors: http://www.naesb.org/pdf4/draft_weq_2009_annual_plan.doc (simple majority vote for EC endorsement of proposed changes to be forwarded for Board approval)

13.	Board of Directors, Board Committee and Regulatory Updates (no votes or action to be taken):
	• Board Updates - http://www.naesb.org/pdf4/bd032609dm.doc (March 26, 2009)
	• Wholesale Gas and Retail key activities – WGQ Annual Plan, Retail Annual Plan - http://www.naesb.org/pdf4/draft_wgq_2009_annual_plan.doc (WGQ), http://www.naesb.org/pdf4/draft_retail_2009_annual_plan.doc (Retail)
	• Update on Board Retail Structure Review Committee efforts – http://www.naesb.org/pdf4/rsrc011509w2.doc
	• FERC Efforts:
	  • WEQ 2.1 Filing on March 12, 2009 - http://www.naesb.org/pdf4/ferc031209_naesb_weq_version_002.1_supplemental_filing.pdf,
	  • DSM-EE Filing on April 17, 2009 - http://www.naesb.org/pdf4/ferc041709_dsm_filing.pdf, and
	  • FERC NOI on Smart Grid Action Plan on March 19, 2009 - http://www.naesb.org/pdf4/ferc041709_dsm_filing.pdf

14.	Other Business
15.	Adjourn

Attire – Business Casual

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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
RETAIL QUADRANTS DRAFT AGENDA

Wednesday, May 13, 2009 – 10:00 a.m. to 4:00 p.m. C
Web Cast and Conference Call, for in person attendance -- ACES Power, Carmel, IN

#	Agenda Item

1. Welcome
   - Antitrust Guidelines
   - Welcome to members and attendees
   - Quorum Establishment: Roll Call of Retail EC Members and Alternates: http://www.naesb.org/pdf4/ec_terms.pdf (EC) and http://www.naesb.org/pdf4/alt_ec_members.pdf (EC Alt)
   - Adoption of Retail Agenda (simple majority) http://www.naesb.org/pdf4/ec051209a.doc
2. Retail Quadrants Draft Minutes (simple majority to approve)
   - Adoption of the Retail EC Meeting Minutes:
     - February 4, 2009: http://www.naesb.org/pdf4/retail_ec020409dm.doc
3. Review and vote on 2009 Retail Annual Plan Item 1 / R05016 – Develop Technical Electronic Implementation Standards and Data Dictionaries (Book 9: Customer Billing and Payment Notification via Uniform Electronic Transactions) (Super majority vote)
   - Recommendation: http://www.naesb.org/pdf4/retail_2009_api1_r05016_rec.doc
   - Comments due April 1, 2009:

     Southern Company: http://www.naesb.org/pdf4/retail_030209southern.doc

     PPLSolutions: http://www.naesb.org/pdf4/retail_ec042209w2.doc
4. Review and vote on R08015, 2009 WGQ Annual Plan Item 2.b, 2009 Retail Annual Plan Item 5 – "Revise the Trading Partner Agreement TPA by removing the Exhibits from the agreement and relegate such information as contained in the Exhibits to operational worksheet(s)" (super-majority vote)
   - Recommendation: http://www.naesb.org/pdf4/r08015_rec.doc
   - Exhibits: http://www.naesb.org/pdf4/r08015_rec_attach1.doc (A), http://www.naesb.org/pdf4/r08015_rec_attach3.doc (B), http://www.naesb.org/pdf4/r08015_rec_attach4.doc (C), http://www.naesb.org/pdf4/r08015_rec_attach5.doc (D), http://www.naesb.org/pdf4/r08015_rec_attach7.doc (E), and http://www.naesb.org/pdf4/r08015_rec_attach9.doc (F)
   - Comments due April 13, 2009:

     ANR Pipeline (1): http://www.naesb.org/pdf4/wgq_req_rgq_031309_anr_tpa.doc

     ANR Pipeline (2): http://www.naesb.org/pdf4/wgq_req_rgq_031309_anr_tpa2.doc

     ANR Pipeline (3): http://www.naesb.org/pdf4/wgq_req_rgq_031309_anr_tpw.doc

     TransCanada: http://www.naesb.org/pdf4/wgq_req_rgq_031309_transcanada_tpw.doc

     Dominion Transmission: http://www.naesb.org/pdf4/wgq_req_rgq_031309dti.doc
5. Review and discuss 2009 Retail Annual Plan Item 4.a – Develop Model Business Practices and procedures for responding to Customer inquiries directed to Distributors and/or Suppliers and for notification of the other party"
   - Recommendation: http://naesb.org/pdf4/retail_2009_api_4a_rec.doc
   - Comments due May 18, 2009: this agenda item is for discussion only. A separate Retail EC conference call will be scheduled to address the recommended standards or the determination can be made that a notational ballot will be forwarded to Retail EC members at the conclusion of the comment period.

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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
RETAIL QUADRANTS DRAFT AGENDA

Wednesday, May 13, 2009 – 10:00 a.m. to 4:00 p.m. C
Web Cast and Conference Call, for in person attendance -- ACES Power, Carmel, IN

#	Agenda Item
6.	Update on Retail Publication Schedule: http://www.naesb.org/misc/retail_publication_schedule_032009.doc
7.	Subcommittee Updates (meeting materials for updates will be provided by leadership as they are available): • Triage Subcommittee: http://www.naesb.org/pdf4/tr040809disposition.doc • Business Practices Subcommittee (BPS) • DSM-EE Subcommittee • Information Requirements Subcommittee (IR) • Technical Electronic Implementation Subcommittee (TEIS) • Texas Task Force • Glossary Efforts
8.	Review, discuss, identify changes and vote to approve changes to the 2009 Annual Plan to be proposed to the Board of Directors: http://www.naesb.org/pdf4/draft_retail_2009_annual_plan.doc (simple majority vote for EC endorsement of proposed changes to be forwarded for Board approval)

9.	Board of Directors, Board Committee and Regulatory Updates (no votes or action to be taken):
	• Board Updates - http://www.naesb.org/pdf4/bd032609dm.doc (March 26, 2009)
	• Wholesale Gas and Wholesale Electric key activities – WGQ Annual Plan, WEQ Annual Plan - http://www.naesb.org/pdf4/draft_wgq_2009_annual_plan.doc (WGQ), http://www.naesb.org/pdf4/draft_weq_2009_annual_plan.doc (WEQ)
	• Update on Board Retail Structure Review Committee efforts – http://www.naesb.org/pdf4/rsrc020409a3.doc
	• FERC Efforts:
	  • WEQ DSM-EE Filing on April 17, 2009 - http://www.naesb.org/pdf4/ferc041709_dsm_filing.pdf, and
	  • FERC NOI on Smart Grid Action Plan on March 19, 2009 - http://www.naesb.org/pdf4/ferc041709_dsm_filing.pdf

10.	Other Business
11.	Adjourn

Attire – Business Casual

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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE GAS QUADRANT DRAFT AGENDA

Thursday May 14, 2009 – 9:00 a.m. to 3:00 p.m. E
ACES Power, Carmel, IN

#	Agenda Item
1.	Welcome • Antitrust Guidelines • Welcome to members and attendees • Quorum Establishment: Roll Call of WGQ EC Members and Alternates: http://www.naesb.org/pdf4/ec_terms.pdf (EC) and http://www.naesb.org/pdf4/alt_ec_members.pdf (EC Alt) • Adoption of WGQ Agenda (simple majority) http://www.naesb.org/pdf4/ec051209a.doc
2.	WGQ Quadrants Draft Minutes (simple majority to approve) • Adoption of the WGQ EC Meeting Minutes: February 5, 2009: http://www.naesb.org/pdf4/wgq_ec020509dm.doc
3.	Review and vote on Recommendation R07017 - "Modify the Confirmation Response Quick Response (NAESB WGQ Std. 1.4.7) to be the newly re-named Confirmation Quick Response such that it can be used as a quick response for both the Request for Confirmation (NAESB WGQ Std. 1.4.3) and the Confirmation Response (NAESB WGQ Std. 1.4.4) (super-majority vote) • Recommendation: http://www.naesb.org/pdf4/wgq_040609reqcom.doc • Comments due May 7, 2009 – as comments are received, they will be posted and an updated agenda with links will be issued as the meeting date approaches.
4.	Review and vote on R08015, 2009 WGQ Annual Plan Item 2.b, 2009 Retail Annual Plan Item 5 – "Revise the Trading Partner Agreement TPA by removing the Exhibits from the agreement and relegate such information as contained in the Exhibits to operational worksheet(s)" (super-majority vote) • Recommendation: http://www.naesb.org/pdf4/r08015_rec.doc • Exhibits: http://www.naesb.org/pdf4/r08015_rec_attach1.doc (A), http://www.naesb.org/pdf4/r08015_rec_attach3.doc (B), http://www.naesb.org/pdf4/r08015_rec_attach4.doc (C), http://www.naesb.org/pdf4/r08015_rec_attach5.doc (D), http://www.naesb.org/pdf4/r08015_rec_attach7.doc (E), and http://www.naesb.org/pdf4/r08015_rec_attach9.doc (F) • Comments due April 13, 2009: ANR Pipeline (1): http://www.naesb.org/pdf4/wgq_req_rgq_031309_anr_tpa.doc ANR Pipeline (2): http://www.naesb.org/pdf4/wgq_req_rgq_031309_anr_tpa2.doc ANR Pipeline (3): http://www.naesb.org/pdf4/wgq_req_rgq_031309_anr_tpw.doc TransCanada: http://www.naesb.org/pdf4/wgq_req_rgq_031309_transcanada_tpw.doc Dominion Transmission: http://www.naesb.org/pdf4/wgq_req_rgq_031309dti.doc
5.	Review and vote on WGQ Request for Formal Comments on Recommendation: 2009 WGQ Annual Plan Item 9 - "Review minimum technical characteristics in Appendices B, C, and D of the WGQ QEDM Manual, and make changes as appropriate", (super-majority vote) • Recommendation: http://www.naesb.org/pdf4/2009_wgq_ap9_rec.doc • Comments due April 13, 2009: Dominion Gas Transmission: http://www.naesb.org/pdf4/wgq_031309dti.doc

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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE GAS QUADRANT DRAFT AGENDA

Thursday May 14, 2009 – 9:00 a.m. to 3:00 p.m. E
ACES Power, Carmel, IN

#	Agenda Item
6.	Review and vote on 2007 WGQ Annual Plan Item 7.a, 2008 WGQ Annual Plan Item 4.a.ii, 2009 WGQ Annual Plan Item 3.a.i , 2008 WGQ Annual Plan Items 9, 2009 WGQ Annual Plan Item 4, R07018, R08019 and R08024 (super-majority vote) A presentation will be made summarizing the standards changes in this recommendation and will be web cast. The presentation will be posted on the NAESB web site directly after the meeting. • Recommendation: http://www.naesb.org/pdf4/wgq_2007ap7a_2008ap4a_2009ap4_2008ap9_2009ap3a_r07018_r08019_r08024_rec.doc • Attachment 1: http://www.naesb.org/pdf4/wgq_2007ap7a_2008ap4a_2009ap4_2008ap9_2009ap3a_r07018_r08019_r08024_rec_attach1.doc • Attachment 2: http://www.naesb.org/pdf4/wgq_2007ap7a_2008ap4a_2009ap4_2008ap9_2009ap3a_r07018_r08019_r08024_rec_attach2.doc • Attachment 3: http://www.naesb.org/pdf4/wgq_2007ap7a_2008ap4a_2009ap4_2008ap9_2009ap3a_r07018_r08019_r08024_rec_attach3.doc • Comments due May 11, 2009: as comments are received, they will be posted and an updated agenda with links will be issued as the meeting date approaches.
7.	Review and Possible Vote on Minor Correction Recommendations [*Additional minor correction recommendations for code value changes may be made be prepared and submitted for consideration as the meeting date approaches and as such, several of the requests for code value changes are shown below. They will be provided either as supplements or though an updated agenda and links depending on the time received. The minor corrections that are not code value changes (to be applied to Version 1.8 or the final actions for Version 1.9) are prepared and ready for vote in their request form. As more of these MCs are forwarded they will be posted for consideration]*: (simple majority vote) *Minor Corrections – Code Value Changes* • Recommendation MC04027 (R04027) et al submitted by Williams Gas Pipeline: http://www.naesb.org/pdf4/wgq_ec051409w16.doc • Request MC08009 (R08009) submitted by Williams Gas Pipeline: http://www.naesb.org/pdf4/wgq_ec051409w5.doc • Recommendation MC08012 (R08012) submitted by Northern Natural Gas: http://www.naesb.org/pdf4/wgq_ec051409w10.doc • Recommendation MC08013 (R08013) and MC08014 (R08014) submitted by Kinder Morgan Energy Partners: http://www.naesb.org/pdf4/wgq_ec051409w11.doc • Recommendation MC08014 (R08014) submitted by Kinder Morgan Energy Partners: http://www.naesb.org/pdf4/wgq_mc08014_rec_042009.doc • Recommendation MC08016 (R08016) submitted by Northern Natural Gas: http://www.naesb.org/pdf4/wgq_ec051409w13.doc • Recommendation MC08017 (R08017) submitted by Boardwalk Pipeline Partners and Texas Gas Transmission: http://www.naesb.org/pdf4/wgq_ec051409w12.doc • Recommendation MC08018 (R08018) submitted by Boardwalk Pipeline Partners and Texas Gas Transmission: http://www.naesb.org/pdf4/wgq_mc08018.doc • Recommendation MC08022 (R08022) submitted by Northern Natural Gas: http://www.naesb.org/pdf4/wgq_ec051409w14.doc • Request MC08023 (R008023) submitted by Enbridge Energy Partners: http://www.naesb.org/pdf4/wgq_mc08023.doc • Request MC09001 submitted by Northern Natural Gas: http://www.naesb.org/pdf4/wgq_ec051409w1.doc • Request MC09003 submitted by Williams Gas Pipeline and Spectra Energy Transmission: http://www.naesb.org/pdf4/wgq_ec051409w3.doc • Request MC09005 submitted by ANR Pipeline: http://www.naesb.org/pdf4/wgq_ec051409w6.doc

North American Energy Standards Board
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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE GAS QUADRANT DRAFT AGENDA

Thursday May 14, 2009 – 9:00 a.m. to 3:00 p.m. E
ACES Power, Carmel, IN

#	Agenda Item

Minor Corrections Applicable to WGQ Version 1.8

- Request MC09002 submitted by Williams Gas Pipeline: http://www.naesb.org/pdf4/wgq_ec051409w2.doc
- Request MC09007 submitted by NAESB WGQ Technical Subcommittee: http://www.naesb.org/pdf4/wgq_ec051409w8.doc
- Request MC09008 submitted by Williams Gas Pipeline: http://www.naesb.org/pdf4/wgq_ec051409w9.doc
- Request MC09010 submitted by El Paso Natural Gas: http://www.naesb.org/pdf4/wgq_mc09010.doc
- Request MC09011 submitted by El Paso Natural Gas: http://www.naesb.org/pdf4/wgq_mc09011.doc

Minor Corrections Applicable to Final Actions for WGQ Version 1.9

- Request MC09004 submitted by Williams Gas Pipeline regarding R05017: http://www.naesb.org/pdf4/wgq_ec051409w4.doc
- Request MC09006 submitted by Williams Gas Pipeline: http://www.naesb.org/pdf4/wgq_ec051409w7.doc
- Request MC09009 submitted by Williams Gas Pipeline: http://www.naesb.org/pdf4/wgq_ec051409w15.doc

8. Update on WGQ Publication Schedule: http://www.naesb.org/misc/wgq_publication_schedule_032009.doc
   - WGQ EC Conference Call in June/July to address outstanding recommendations for Version 1.9

     Pending Recommendation R04014: http://www.naesb.org/pdf4/r04014_rec.doc

     Pending Recommendations for WGQ EDM Activities
9. Subcommittee Updates (meeting materials for updates will be provided by leadership as they are available):
   - Triage Subcommittee: http://www.naesb.org/pdf4/tr040809disposition.doc
   - Business Practices Subcommittee (BPS)
   - Electronic Delivery Mechanisms Subcommittee (EDM)
   - Information Requirements Subcommittee (IR)
   - Technical Subcommittee
   - Interpretations Subcommittee
   - Contracts Subcommittee
10. Review, discuss, identify changes and vote to approve changes to the 2009 Annual Plan to be proposed to the Board of Directors: http://www.naesb.org/pdf4/draft_wgq_2009_annual_plan.doc (simple majority vote for EC endorsement of proposed changes to be forwarded for Board approval)
11. Board of Directors, Board Committee and Regulatory Updates (no votes or action to be taken):
    - Board Updates - http://www.naesb.org/pdf4/bd032609dm.doc (March 26, 2009)
    - Retail and Wholesale Electric key activities – Retail Annual Plan, WEQ Annual Plan - http://www.naesb.org/pdf4/draft_retail_2009_annual_plan.doc (Retail), http://www.naesb.org/pdf4/draft_weq_2009_annual_plan.doc (WEQ)
    - Update on Board Retail Structure Review Committee efforts – http://www.naesb.org/pdf4/rsrc011509w2.doc
    - FERC Efforts:
      FERC Final Rule on WGQ Version 1.8 issued February 24, 2009: http://www.naesb.org/pdf4/ferc022409_wgq_v1.8.doc
12. Other Business
13. Adjourn

Attire – Business Casual

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April 8, 2009

TO: NAESB Wholesale Electric Quadrant Executive Committee, Alternates, and Interested Industry Participants

FROM: Cory Galik Cummings, Staff Attorney

RE: WEQ Executive Committee Conference Call Draft Minutes

NORTH AMERICAN ENERGY STANDARDS BOARD
Wholesale Electric Quadrant (WEQ) Executive Committee Meeting
Tuesday, January 27 from 2:00 pm to 5:00 pm C
DRAFT MINUTES

1. Welcome

Ms. McQuade welcomed the Wholesale Electric Quadrant (WEQ) Executive Committee (EC) members and other participants. She introduced Mr. Goldberg as the new vice-chair for the WEQ EC. Ms. Cummings gave the antitrust guidance and initiated the roll call of the WEQ EC members. Quorum was established. The other participants on the phone introduced themselves. Mr. Goldberg made a motion to adopt the agenda as drafted and Ms. Crockett seconded. The motion passed.

2. Discussion of Recommendation and Comments

Mr. Goldberg provided an overview of the recommendation of the subcommittee. Mr. Winkler provided a high level summary of the recommendation and the goals established by the drafting team. Those goals were 1) consolidate standards for existing and proposed Demand Response (DR) products and performance evaluation methodologies; 2) define common terms; and 3) create consistency among entities that participate in DR. The ISO/RTO work group took an approach to create transparency in order to make the standards accessible and understandable, to enhance accountability and allow the System Operator to accurately measure the performance of these products as well as create consistency among the North American markets. The work group identified the products, performance methodologies and key criteria as well as developed a glossary of terms that were used throughout the standards. At the subcommittee level there was agreement on the types of products offered on the wholesale market and the specific criteria related to each product type. There was also agreement on the performance methodologies. There was discussion on some of the definitions, most notably the Baseline definition. The subcommittee also discussed the addition of the word "framework" to the title as well as the applicability of the wholesale standards to only the ISO/RTOs. The DR programs administered by utilities are associated with the retail effort. In the future, there may be wholesale products administered by those other than the ISO/RTOs and at that time the standards can be re-addressed to determine applicability.

Mr. Breidenbaugh noted that the addition of the word "framework" to the title was important as this work was a first step and he hoped that additional work would continue to refine the work product to the point of creating technical standards for measurement and verification (M&V) after this recommendation is adopted. Ms. McQuade responded that it has been recognized that more granularity would be helpful. Mr. Breidenbaugh commended the work group for their hard work on the recommendation.

Mr. Wattles moved to adopt the recommendation. Mr. Breidenbaugh seconded the motion.

Mr. Winkler noted that the IRC had a redlined version of the standards submitted as comments with 41 changes to the standards in the motion. They provided an additional document with an explanation of the more significant changes made. Ms. McQuade noted that the changes for spelling errors could be made as friendly amendments. Mr. Winkler reviewed the spelling and grammar corrections. Those corrections were accepted by Mr. Wattles and Mr. Breidenbaugh as friendly amendments.

Mr. Winkler offered a friendly amendment related to the wording of the Baseline definition. Wording was removed from the definition as it was modified at the December 2 DSM-EE subcommittee meeting and placed in a higher

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level region, as it was more appropriate in the text of the standard description, rather than in the definition. Mr. Winkler also asked that qualitative statements on the performance methodologies that did not add value to the standards be removed as part of the friendly amendment. Mr. Wattles and Mr. Breidenbaugh agreed to those changes.

Mr. Winkler offered an amendment to the standard regarding the Baseline definition. Mr. Wattles provided an explanation. The deletion was to restore much of their original draft definition. As the ISO work group read the amendments from the December 2 DSM-EE subcommittee meeting, they discovered that the terminology incorporated into the Baseline definition at that meeting came from IPMPV, which is largely applicable to Energy Efficiency (EE). The language added at the December 2 subcommittee meeting introduced terminology and concepts not found in the standards. As such, the language was not appropriate for the Baseline definition as it is used throughout the recommendation. Mr. Wattles and Mr. Breidenbaugh considered this to be a friendly amendment and accepted the change.

Ms. Sheffrin moved to remove the word "framework" from the recommendation as she did not see the value in including that term in the standards. Mr. Yeung seconded the motion. Mr. Breidenbaugh said that removing the term would result in him voting against the recommendation. Mr. Winkler reiterated a discussion that occurred in the December subcommittee meeting regarding the addition of the word "framework" without the terms "Business Practice" as an unacceptable amendment because there would be a connotation that the work would no longer be standards. Ms. McQuade said that this document was drafted to create Business Practices and the removal of those words could lead readers to assume that the work product was not a set of business practice standards. The ISOs believe that the use of the term "framework" does not add value to the work product and could diminish the intent of the work. They recognize this document is the first step and noted that the ISO/RTO work group is committed to participate in efforts to develop more technical standards. Ms. Sheffrin noted that she did not make the motion with the thought that this was the final work product; she recognized that more work would be done.

Before a vote was taken on the removal of the word "framework" from the title, Mr. Davis asked a question regarding quorum. Ms. McQuade explained that quorum established at the beginning of a meeting holds for the entire meeting. Mr. Boswell agreed that unless there is a bylaw provision to the contrary, quorum established at the start of a meeting continues through the meeting and is valid until a recess is called. Mr. Davis asked about the conditions that would cause a meeting to end prematurely. Mr. Boswell said a motion to adjourn could be made at any time and is not debatable. To adjourn prior to the conclusion of business would require a motion, a second and a vote. He also noted that NAESB operates under a Certificate and Bylaws and there is no reference to this issue in either and where our Certificate and Bylaws are silent, NAESB follows Robert's Rules of Order, where quorum is established at the start of the meeting.

The motion to remove the term "framework" from the title passed a simple majority vote with eight in support and five in opposition (VOTE 1).

3. Vote on Recommendation

As the EC members prepared to vote, Ms. McQuade noted that any EC members not present on the phone will receive a notational ballot. After members on the phone voted there were not enough votes cast to determine a result (VOTE 2). Mr. Breidenbaugh expressed concern about the EC members casting votes that were not present on the call. Ms. McQuade noted that absent members will receive the motions that were made during the meeting, a redlined recommendation, a list of EC members that voted for or against the motion and they will be encouraged to discuss the recommendation with their colleagues before casting their ballot. She also noted that EC member will have two weeks to cast their notational ballot. If the recommendation passes it will go out for ratification. Mr. True pointed out that there is an EC meeting next week and that will be an opportunity for members to converse before the notational ballot is due. Mr. Breidenbaugh suggested looking at the transcript and working with others to develop language to include in any filing regarding the EC's view that in adopting the recommendation they are doing so in recognition that this is the first step in the development process.

Ms. McQuade noted that companies were encouraged to submit comments with their notational ballots.

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4. Adjourn

Mr. Pritchard moved to adjourn, seconded by Ms. Crockett. The meeting adjourned at 3:59 PM Central.

5. Voting Results

NORTH AMERICAN ENERGY STANDARDS BOARD

Wholesale Electric Quadrant Executive Committee Voting Record – January 27, 2008 – With Notational Ballots Received by February 10, 2008

TRANSMISSION SEGMENT		SUBSEGMENT	PRESENT	VOTE 1	VOTE 2
Patrick McGovern	Georgia Transmission Corporation	Muni/Coop	Phone	Opposed	Support
Wendy Weathers	Salt River Project	Fed/State/Prov			Support (NB)
Daryl McGee	Southern Company Services	IOU	Phone	Opposed	Support (NB)
Edward Davis	Entergy Services, Inc.	IOU	Phone	Opposed	Support
Mark Hackney	Arizona Public Service	at large			Support (NB)
Bob Harshbarger	Puget Sound Energy	at large			Support (NB)
Michelle Mizumori	WECC	At-Large	Phone		Support (NB)
GENERATION SEGMENT			**PRESENT**	**VOTE 1**	**VOTE**
William J. Gallagher	Vermont Public Power Supply Authority	Muni/Coop	Phone		Support (NB)
Kathy York	Tennessee Valley Authority	Fed/State/Prov.			Support (NB)
L. Oberski for J.Babik	Dominion Resource Services, Inc.	IOU	Phone		Support
John Ciza	Southern Company Services	IOU			Support (NB)
Ron Mucci	Entegra Power Group, LLC	Merchant			
Gary Hinners	Reliant Energy, Inc.	at large	Phone	Abstain	Abstain
Neal Balu	Integrys Energy Services, Inc.	at large			
MARKETERS/BROKERS SEGMENT			**PRESENT**	**VOTE 1**	**VOTE**
Mack Thompson	American Municipal Power - Ohio	Muni/Coop			
V. Crockett for B. Thornton	Tennessee Valley Authority	Fed/State/Prov.	Phone	Support	Support
V A C A N C Y					
Mark Mitchell	Salt River Project	at large			
John Apperson	PacifiCorp Energy	IOU			
Roy True	ACES Power Marketing	IOU	Phone	Opposed	Support
Barry Green	Electric Power Supply Association	at large			Support (NB)
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT		**SUBSEGMENT:**	**PRESENT**	**VOTE 1**	**VOTE**
Robert Williams	Florida Municipal Power Agency	Muni/Coop			
V A C A N C Y					
Alan Pritchard	Duke Energy Corporation	IOU	Phone	Abstain	Support
Jeffrey C. Mueller	Public Service Electric and Gas Company	IOU			Support (NB)

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NORTH AMERICAN ENERGY STANDARDS BOARD

Wholesale Electric Quadrant Executive Committee Voting Record – January 27, 2008 – With Notational Ballots Received by February 10, 2008

Robert Martinko	FirstEnergy Service Company	at large	Phone	Support	Support
Syd Berwager	Bonneville Power Administration	Other	Phone	Abstain	Support (NB)
Andy Rodriquez	NERC	At-Large			Support
END USERS SEGMENT			**PRESENT**	**VOTE 1**	**VOTE**
V A C A N C Y		at large			
Aaron Breidenbaugh	EnerNOC	at large	Phone	Opposed	Support (NB)
Lou Ann Westerfield	Idaho Public Utilities Commission	Regulator			Support (NB)
V A C A N C Y		at large			
V A C A N C Y		at large			
V A C A N C Y		Large Industrial			
B. Shwermann for P. Sorenson	Open Access Technology International, Inc.	At-Large			Support (NB)
INDEPENDENT GRID OPERATORS/PLANNERS			**PRESENT**	**VOTE 1**	**VOTE**
C. Wesley for S. Bresler	PJM Interconnection		Phone	Support	Support
Jim Castle	New York Independent System Operator, Inc.		Phone	Support	Support
Matt Goldberg	ISO New England, Inc.		Phone	Support	Support
Anjali Sheffrin	California ISO		Phone	Support	Support
P. Wattles for J. Mickey	ERCOT		Phone	Support	Support
J. Marshall for E. Skiba	Midwest Independent Transmission System Operator		Phone	Support	Support
Charles Yeung	Southwest Power Pool		Phone		Support

Notes:

- The WEQ EC passed the modified recommendation with all segments reaching the 40% threshold and the 67% quadrant threshold. The WEQ EC had 29 out of a possible 36 votes (83%) in favor. No negative votes were cast. Votes cast via notational ballot are indicated with (NB).
- In the voting column, a blank indicates that the EC member did not attend, return a ballot prior to the meeting, or return a ballot after the meeting.
- A vote of "Abstain" in the voting column has the same effect as a negative vote and contributes as such to the overall result, but the submitter is casting a vote that is neither in support nor in opposition.

6. Other Participants

Name	**Company**
John Babik	Dominion Resources
Bill Boswell	NAESB
Cory Galik Cummings	NAESB

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Name	**Company**
John Hughes	ELCON
Ryan Irwin	FERC
Gary Kajander	Monsanto Company
Bill Lohrman	FERC
Rob Martinko	FirstEnergy
Rae McQuade	NAESB
David Meade	Praxair
Donna Pratt	New York ISO
Diana Pommen	Alberta Electric System Operator
Denise Rager	NAESB
Narinder Saini	Entergy
Dean Ulch	Southern Company
Jill Webb	NAESB
Eric Winkler	ISO New England

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March 10, 2009

TO: NAESB Wholesale Electric Quadrant Executive Committee and Interested Industry Participants

FROM: Deonne Cunningham, NAESB Staff Attorney

RE: WEQ Executive Committee Meeting Revised Draft Minutes – February 3, 2009

NORTH AMERICAN ENERGY STANDARDS BOARD
WHOLESALE ELECTRIC QUADRANT (WEQ)
EXECUTIVE COMMITTEE MEETING
Hosted by Salt River Project – Phoenix, Arizona
Tuesday, February 3, 2009 – 10:00 am to 4:00 pm Mountain
REVISED DRAFT MINUTES

1. Welcome

Ms. York called the meeting to order and welcomed the Wholesale Electric Quadrant (WEQ) Executive Committee (EC) members and other participants. Ms. Cunningham gave the antitrust guidance and initiated the roll call of the WEQ EC members. Quorum was established. The other participants, both in attendance and on the phone, introduced themselves.

2. Adoption of Wholesale Electric Draft Agenda and Minutes

Wholesale Electric Draft Agenda: Ms. York reviewed the agenda and Mr. Skiba suggested changes to the order of and revisions to the Agenda. He noted a typo in the July 31/August 8, 2008 meeting minutes listing in the agenda. He further suggested that the addition of the discussion of the restructuring of the Electronic Scheduling and Information Technology Subcommittees (ESS/ITS) to agenda item 6. There were no objections to the friendly amendments to the agenda. Ms. Crockett moved to adopt the agenda as amended. The motion passed unanimously without opposition.

The participants reviewed the draft minutes from the November 4, 2008 WEQ EC meeting. Mr. Skiba moved to adopt the minutes as posted. Mr. Berwager seconded the motion. The motion passed without opposition or discussion. The final minutes are available for viewing via the following link: http://naesb.org/pdf4/weq_ec110408fm.doc.

The participants reviewed the draft minutes from the January 23, 2009 WEQ EC meeting. Mr. Davis moved to adopt the minutes as posted. Mr. Castle seconded the motion. The motion passed without opposition or discussion. The final minutes are available for viewing via the following link: http://naesb.org/pdf4/weq_ec012309fm.doc.

The participants reviewed the draft minutes from the July 31 / August 8, 2008 WEQ EC meeting. Mr. Skiba moved to adopt the minutes as posted. Mr. Davis seconded the motion. The motion passed without opposition or discussion. The final minutes are available for viewing via the following links: http://naesb.org/pdf4/weq_ec073108_080808fm.doc.

3. Discussion and consideration of recommendations for standards, comments submitted, and vote on:

2008 WEQ Annual Plan Item 6.m/R07007 - Update the Timing Table to Reflect the Categories (On-time, Late, After-the-fact, and Pre-late) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange (RFI)): Mr. Skiba moved to adopt the recommendation. Mr. Harshbarger seconded the motion. Mr. Skiba reviewed the comments submitted by the Standards Review Subcommittee (SRS) and outlined the two modifications suggested by the subcommittee to the recommendation. He noted that the modifications are related to the renumbering of the footnotes listed in the recommendation. He further noted that After the Fact should be used instead of the acronym "ATF" as the term is not defined within the standard. He stated that the suggestions by the SRS were discussed with the Joint Interchange Scheduling Working Group (JISWG) during its November 2008

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meeting. Mr. Harshbarger stated that the JISWG agreed with the suggested modifications offered by the SRS. Mr. Skiba offered the following friendly amendment: Amendments submitted by the SRS subcommittee be accepted as friendly amendments. Mr. Harshbarger seconded the motion. Both accepted the modification offered as a friendly amendment to the motion. The motion passed a simple majority vote.

Ms. York asked if anyone would like to offer any other amendments to the motion to adopt the recommendation. None were offered. The participants took a super majority roll call vote on the motion to adopt the recommendation as amended. The motion passed a super majority call vote [V1]. The revised recommendation (redline) as approved by the EC is available for viewing via the following link: http://naesb.org/pdf4/weq_ec020309a2.doc.

2008 WEQ Annual Plan Item 6.b/R07020 – (Delayed for action at the November 2008 EC meeting) Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control: Mr. True made the following motion: Adopt recommendation 2008 WEQ Annual Plan Item 6(b)/R07020 (Delayed for action at the November 2008 WEQ EC meeting, WEQ Annual Plan Item 6b -- Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control). Mr. Breidenbaugh seconded the motion. Mr. Busbin reviewed the suggestions offered by the WEQ Inadvertent Leadership ("Leadership"). He stated that discussions between NERC and NAESB noted problematic language within the recommendation. The Leadership proposed language for WEQ-006 that would change the maximum offset listed in Time Error Correction Initiation (Method 2) and the field trial to 0.10 HZ instead of the 0.20 HZ offset. Mr. Busbin noted that the addition of a footnote which states the following: Pending a successful Time and Inadvertent Management field trial and subsequent reliability standard approvals, the Interconnection Time Monitor shall have the discretion to choose any increment of offset frequency , up to and including the Maximum Offset frequency, deemed necessary to effect Time Error Correction. He further noted that modifications made by the Leadership to the WEQ-006 business practices had been previously discussed with the NERC Balancing Authority Control Standards Drafting Team (BACDST). He stated that modifications were also made to WEQ-007-1.1.4 as it relates to the Unilateral Payback (Method 2) which notes that Method 2 may only be utilized whenever the Balancing Authority's Inadvertent Balance and Time Error have the same sigh. He further stated that changes were made to the two methods in which Payback Method 2 may be accomplished. Mr. Bilke stated that the modifications made by the Leadership redundant and step back from what was originally offered by the WEQ Business Practice Subcommitee (BPS) and Time and Inadvertent Management Task Force (TIMTF).

Mr. Bilke responded to the proposed modifications to the recommendation with a presentation and supporting documentation to the presentation. He stated that the proposed changes to the NAESB Business Practices were originally submitted to NERC by Midwest ISO via a SAR to address several Order No. 693 concerns (size of inadvertent balances, number of Time Error Corrections (TEC), efficiency of TECs, number of frequency excursions). He further stated that the NERC Standards Committee rejected the SAR as Time Error Corrections and Inadvertent Payback were NAESB issues. The standards request were submitted to NAESB to modify WEQ-006 and WEQ-007. Mr. Rodriquez responded that FERC directed NERC to take action on this issue due its reliability base. He stated although NERC rejected the SAR, there are divisional issues between the commercial and reliability implications of the recommendation. He stated that currently NERC is considering the elimination of the TECs and that the standards may be unnecessary if NERC should identify this couse of action. He further stated that the reliability goal of keeping average frequency to 60.00 HZ is not an accurate reliability goal as suggested in the recommendation. He explained that the current language in the recommendation would allow industry participants to violate the NERC CPS standards and the CPS calculations should be conducted only under the purviews of NERC. Ms. York questioned whether the modifications submitted by the Leadership address NERC concerns. Mr. Rodriquez responded in the affirmative. Mr. Bilke responded that the current recommendation contains the exact wording that was contained the SAR rejected by NERC. He stated that the proposed modifications would make the recommendation more constrained.

Discussions were held between Mr. Rodriquez and Mr. Bilke concerning decisions to clarify the terms of the proposed business practice standard. Mr. Rodriquez offered the following amendment: Amendment to accept recommended changes submitted by Inadvertent Leadership, Ms. Crockett seconded the motion. Mr. True and Mr.

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Breidenbaugh accepted the modification as an amendment to the motion. The motion passed a simple majority vote with Ms. Weathers, Mr. Green, Mr. Martinko, Mr. Skiba, and Mr. Yeung opposed.

Mr. Berwager stated that further clarification is needed in the recommendation with respect to the Western Interconnection. Mr. True made the following friendly amendment: Friendly amendment adding to WEQ-006 and WEQ-007 Purpose statements (as the last sentence) the following language - "Except where specifically identified, the following practices do not pertain to the Western Interconnect." Mr. Gallagher seconded the motion. Mr. True and Mr. Gallagher accepted the modification as a friendly amendment to the motion. The motion passed a simple majority vote with no opposition.

Ms. York asked if anyone would like to offer any other amendments to the motion to adopt the recommendation. None were offered. The participants took a super majority roll call vote on the motion to adopt the recommendation as amended, however there were an insufficient number of votes cast to determine the outcome [V2]. A notational ballot was distributed on February 9, 2009 to all EC members. It was determined that the motion failed to achieve the 67% super majority requirement. A redlined version of the recommendation reflecting the modifications made through amendments can be found on the NAESB website through the following link: http://naesb.org/pdf4/weq_ec020309a4.doc.

4. Discussion, consideration and vote minor corrections submitted by Barbara Rehman:

Ms. Rehman reviewed the minor corrections submitted by Bonneville Power Administration. She explained that the minor correction should be applied to WEQ-013-2.6.8.2 by replacing "FULL_TRANSFER" with the term "PART_TRANSFER." Mr. Berwager made a motion to adopt the minor correction submitted by Ms. Rehman. Mr. Hackney seconded the motion. The motion passed without opposition. A redline version of the minor correction can be found via the following link: http://naesb.org/pdf4/weq_ec020309a6.doc.

5. Review, discussion and possible change of reporting relationship of JISWG

Mr. Skiba provided a brief overview of the reporting relationship of JISWG to the ESS/ITS. He explained JISWG's role has changed in the recent years from its original scope and Mission Statement. During the January 2009 meeting, the ESS/ITS questioned whether a recommendation related to Coordinate Interchange should be reviewed and approved by the subcommittees. Mr. Harshbarger suggested that the JISWG Mission Statement be revised to state the various roles and responsibilities of the group. The members held discussion in regards to the standards development process within the JISWG. Mr. Sorenson noted that the JISWG is a specific e-Tag technical group created to coordinate with NERC as it relates to its INT standards. Mr. Hackney made the following motion: The JISWG is not required to gain WEQ ESS /ITS approve of its recommendations before sending them out for formal comment. Mr. Berwager seconded the motion. The motion passed a simple majority vote without opposition.

The members also held discussion in regards to the whether the ESS and ITS subcommittees should be formed as one subcommittee. The co-chairs of the ESS/ITS will meet and develop a recommendation in regards to this issue. It will be submitted to the WEQ EC at the May 12, 2009 meeting.

6. Discussion on tools/certification process to support industry compliance of NAESB WEQ standards

The members held discussion on the certification process used to support industry compliance of NAESB WEQ standards. Mr. Skiba questioned whether the WEQ can develop a certification process to aid in the facilitation of compliance. Ms. McQuade responded that the Wholesale Gas Quadrant (WGQ) has a certification program and noted that this issue can be added as an item to the 2009 WEQ Annual Plan for investigation purposes. She further noted that the certification process focuses on information exchange and does not address those business practice standards which may require further interpretation.

After further discussion, the members agreed that this matter will require additional investigation and will be included on the agenda for the May meeting.

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7. Review, discuss, identify changes and vote to approve changes to the 2009 Annual Plan to be proposed to the Board of Directors

Next, Ms. McQuade reviewed the changed to the 2009 WEQ Annual Plan ("Plan"). Mr. Skiba suggested several modifications to the Plan. He suggested completion date changes for 2009 WEQ Annual Plan Items 1.d. and 1.e and the addition of the following language to the status of these specific items:

> "Upon initiation of this item by NAESB. a completion date will be determined. The date of 2011 is based on a completion date provided in the NERC BAC project schedule which includes extensive field testing and diverse proposed TIMTF directions to be reconciled in subcommittee meetings."

He recommended that 2009 WEQ Annual Plan Item 1.f be listed as Provisional Item 5.

As noted in a supplemental document, Mr. Breidenbaugh recommended the drafting of an additional Annual Plan Item with language as follows:

> "Develop more detailed technical standards for the measurement and verification of demand response products and services in ISO-RTO footprint areas."

He stated that the status was to be listed as not completed with the scope to be initiated in 2nd Q, 2009, after which a completion date will be set. The completion date was noted as Phase II. The members held extensive discussion as it relates to the addition of this proposed Annual Plan Item.

Mr. Skiba moved to accept the revisions to the WEQ 2009 Annual Plan as presented. Mr. Breidenbaugh seconded the motion. The motion passed a simple majority vote without opposition. The revised version of the Plan (redline) as approved by the EC is available for viewing via the following link: http://www.naesb.org/pdf4/weq_ec020309w4.doc.

8. Update on specific issues

Order No. 890 Plan: Mr. Sorenson provided a review of the Order No. 890 Plan. He noted that the ESS/ITS is continuing its work with NITS but stated that this work will be postponed due to Part II of the Rollover Rights of Redirects. He stated that NITS has a target completion date for the end of the 2nd quarter 2009.

Mr. Rodriquez stated his concern with the NERC and NAESB standards on whether to approve or apply the Capacity Benefit Margin (CBM) standard. He noted that although these conditions are related, there is the potential for conflict. He made the following motion: The WEQ Executive Committee will continue to work with NERC to ensure that MOD-004 and WEQ-004 with regards to approval of the CBM schedules remain complementary. Mr. Green seconded the motion. The motion passed a simple majority vote without opposition. Ms. McQuade noted that this language will be included in the Version 2.1 standards to be filed with the Commission in late February 2009.

DSM-EE efforts: Ms. Cummings provided an update in regards to the DSM efforts. She noted that the recommendation for the Wholesale Measurement and Verification of Demand Response programs was out for notational ballot on January 27, 2009. The notational ballot is due back to the NAESB office on February 10, 2009. Ms. McQuade stated due to the visibility of this issue, members that have abstained or voted in opposition for this recommendation are urged to put send forth comments stating the reasons for their decision.

Efforts to resolve rollover rights with FERC input: Ms. McQuade provided an update in regards to the efforts to resolve rollover rights with FERC input. She stated that an WEC EC Task Force Session conference call was held on January 8, 2009 in which WEQ EC members and FERC staff discussed Part II of the Rollover Rights of Redirects on a Firm Basis. It was determined during this meeting that Part II of the recommendation should be remanded back to the ESS/ITS subcommittees for further review and discussion. Mr. Berwager moved to remand back to the WEQ ESS/ITS rollover rights and make confirming changes to the 2009 WEQ Annual Plan Item 2(a)(ii)(3). Mr. Davis seconded the motion. With a simple majority vote, the motion unanimously passed. The 2009 WEQ Annual Plan has been revised to note that this issue has been remanded back to the ESS/ITS.

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Glossary Efforts: Mr. Skiba gave a brief update in regards to the current status of the Glossary Recommendation. He stated that the WEQ Subcommittee co-chairs will create WEQ-000 which will consist of the following two sections: Acronyms and Common Definitions. He noted that extensive changes are being made to the individual business practices. The target completion date for the recommendation is the end of the 2nd quarter 2009.

9. Subcommittee Updates and Plan Updates

Triage Subcommittee: Ms. Mcquade noted that new requests have been submitted to the subcommittee and that these requests will be reviewed at a later date.

Business Practices Subcommittee: Mr. Skiba provided a brief review of the BPS presentation. He stated that the BPS will develop sub-teams and working groups including a Balancing Authority Controls Coordination working for 2009. He said that the next meeting for the BPS is scheduled for February 9, 2009 in which volunteers will be solicited for the various sub-teams and working groups.

Electronic Scheduling (ESS) and Information Technology (ITS) Subcommittees: Mr. Sorenson provided a brief overview of the work in progress and future projects within the ESS/ITS Subcommittees. He stated that the ESS/ITS is currently working on Network Integration Transmission Services (NITS). However, the subcommittees will begin work on Park II of the Rollover of Redirects on a Firm Basis during the February 4-5, 2009 meeting. Mr. Sorenson noted that the subcommittees will begin work on Preemption and Cross Transmission Coordination at a later date.

Joint Interchange Scheduling Working Group (JISWG): Mr. Harshbarger provided a brief review of recent JISWG activities. He stated that the JISWG reviewed and revised the 2009 WEQ Annual Plan during the January 15, 2009 meeting. He further stated that the group reviewed a draft of the confidentiality agreement and is awaiting discussion with NAESB counsel with respect to possible modifications to the agreement. He noted that the Request for Proposal (RFP) for the Electric Industry Review (EIR) is currently under review with NERC staff and counsel. He further noted that the JISWG will complete work on the 1.8.1 e-Tag specifications and implementation guide during the 2nd quarter of 2009.

He also provided a brief overview of the recommendation approved by JISWG in regards to 2009 WEQ Annual Plan Item 3.a.vi: Mr. Harshbarger made the following motion: The WEQ EC adopts and supports the recommendation presented by the JISWG regarding the NAESB 2009 Annual Plan item 3(a)(vi), Transition of e-Tag Specification and schema to NAESB. Mr. Skiba seconded the motion. The motion passed a simple majority vote without opposition.

The next JISWG meeting is scheduled for March 11-12, 2009 at the NAESB office in Houston, Texas.

Standards Review Subcommittee (SRS): Mr. Skiba provided a brief review of the SRS presentation. He stated that SRS will review the 2009 WEQ Annual Plan Item 6.f./R08025 (Synchronize Bidding Credit Requirements for FTR, TCC, and CRR) during its February 2009 meeting. He noted that the SRS will continue to monitor NERC projects, SARS, and Interpretations to determine if there is the potential for NAESB complimentary standards. The SRS will also continue annually review the NERC Reliability Standards Development Plan. He stated that the subcommittee has requested additional and active participation during the SRS meetings.

10. Board of Directors, Board Committee and Regulatory Updates

Board Updates: Ms. McQuade urged participants to review the minutes from the December 18, 2008 Board meeting.

Wholesale Gas and Retail key activities – WGQ Annual Plan, Retail Annual Plan: Ms. McQuade stated that the Retail Restructure Review Committee will review and discuss possible Retail Restructuring options on February 4, 2009. She said that the Retail EC will review some of the key activities (i.e., Customer Choice, Electronic Billing and Payment, and DSM-EE) that have been noted on the 2009 Retail Annual Plan.

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She stated that the 2009 WGQ Annual Plan reflects the maintenance work being undertaken as a result of FERC, which includes FERC Order No. 717 work and Gas and Electric coordination. She noted there are numerous activities that are requiring work from multiple quadrants.

Update on Board Retail Structure Review Committee efforts: The Retail Restructure Review Committee is currently considering modifications to segments and collapsing some of the segments so that they could more appropriately reflect the retail market. The Committee will provide an update to the NAESB Board during its March 2009 meeting.

April 1-2, 2009 Workshop Announcement: NAESB will host a two-day workshop at the MGM Grand in Las Vegas, Nevada. Mr. Boswell, NAESB General Counsel will teach a half day class dealing with NAESB Roles and Responsibilities. Mr. Miles of FERC will host a day and a half course that relates to negotiation skills. There will be no charge to attend the class and is on a first come-first serve basis. More details are to follow from the NAESB office.

Advisory Council Meeting February 14, 2009- The NAESB Advisory Council Meeting will be held in conjunction with the Winter NARUC meeting on February 14, 2009. The NARUC Winter Session is take place February 15-18, 2009.

11. New Business

NAESB Board and Executive Committee 2009 Meeting Schedule: The participants were encouraged to review the NAESB Board and EC 2009 Meeting Schedule. The meeting schedule is available for viewing via the following link: http://naesb.org/pdf4/2009_Brd_EC_Schedule.doc.

12. Adjourn

Ms. Crockett moved to adjourn the meeting. The meeting adjourned at 3:51p.m. Mountain on February 3, 2009.

12. Attendance and Voting Record

February 3, 2009 – WEQ EC Attendance and Voting Record

ATTENDANCE	V1	V2	Motions are included within the meeting minutes. Y – indicates an affirmative vote, N indicates a vote in opposition, RB indicates that the voter requested and/or received a notational ballot to cast his or her vote during the notational balloting period, A – indicates an abstention, (NB) – indicates that the vote was made through a notational ballot, a blank cell indicates that the voter was not present when the vote was called.		
TRANSMISSION SEGMENT					SUBSEGMENT:
In Person	A	Y	Patrick McGovern	Georgia Transmission Corporation	Muni/Coop
In Person	Y	A	Wendy Weathers	Salt River Project	Fed/State/Prov.
In Person	Y	N(NB)	Daryl McGee	Southern Company Services	IOU
In Person	Y	A(NB)	Mark Hackney	Arizona Public Service	At-Large
In Person	Y	Y	Edward Davis	Entergy Services, Inc.	IOU
In Person	Y	A(NB)	Bob Harshbarger	Puget Sound Energy	at large
In Person	Y	A	Michelle Mizumori	WECC	At-Large
GENERATION SEGMENT					
Phone	Y	Y	William J. Gallagher	Vermont Public Power Supply Authority	Muni/Coop
In Person	Y	N(NB)	Kathy York	Tennessee Valley Authority	Fed/State/Prov.
In Person	Y	Y	Jalal Babik	Dominion Resource Services, Inc.	IOU
Phone	Y	Y	John Ciza	Southern Company Services	IOU
		N(NB)	Ron Mucci	Entegra Power Group LLC	Merchant
		RB	Gary Hinners	Reliant Energy, Inc.	at large
		N(NB)	Neal Balu	Wisconsin Public Service Corporation	at large
MARKETERS/BROKERS SEGMENT					
		RB	Mack Thompson	American Municipal Power	Muni/Coop
In Person	Y	N(NB)	Valerie Crockett alt. for B. Thornton	Tennessee Valley Authority	Fed/State/Prov.
			VACANCY		
			VACANCY		
		RB	John Apperson	PacifiCorp Energy	IOU

February 3, 2009 – WEQ EC Attendance and Voting Record

In Person	Y	Y	Roy True	ACES Power	at large
In Person	Y	N	Barry Green	Electric Power Supply Association (EPSA)	at large
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT					SUBSEGMENT:
In Person	Y	Y	Robert Williams	Florida Municipal Power Agency	Muni/Coop
			VACANCY		Muni/Coop
Phone	Y	N(NB)	Alan Pritchard	Duke Energy Corporation	IOU
		RB	Jeffrey C. Mueller	Public Service Electric and Gas Company	IOU
Phone	Y	N	Robert Martinko	FirstEnergy Service Company	at large
In Person	Y	Y(NB)	Syd Berwager	Bonneville Power Administration	Other
In Person	Y	Y	Andy Rodriquez	NERC	At-Large
END USERS SEGMENT					
			VACANCY		At-Large
In Person	Y	Y	Aaron Breidenbaugh	EnerNOC, Inc.	At- Large
		RB	Lou Ann Westerfield	Idaho Public Utilities Commission, rep. National Association of Regulatory Utility Commissioners	Regulator
			VACANCY		At-Large
			VACANCY		At-Large
			VACANCY		At-Large
In Person	Y	Y	Paul Sorenson	Open Access Technology International, Inc.	At-Large
INDEPENDENT GRID OPERATORS/PLANNERS SEGMENT					
In Person	Y	N(NB)	Cathy Wesley alt. for S. Bresler	PJM Interconnection	
In Person	Y	N(NB)	Jim Castle	New York Independent System Operator, Inc.	
	Y	N(NB)	Matt Goldberg	ISO New England, Inc.	
Phone	Y	A(NB)	Shucheng Liu for A. Sheffrin	California ISO	
Phone	Y	N(NB)	Paul Wattles for J. Mickey	Electric Reliability Council of Texas	
In Person	Y	N	Ed Skiba	Midwest ISO	

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February 3, 2009 – WEQ EC Attendance and Voting Record

Phone Y N Charles Yeung Southwest Power Pool

TOTALS	Votes possible	Votes Cast		Percentage Affirmative Votes Cast		Reaching the 40% Segment Affirmative Vote Threshold?		Motion Passing	
		Super Majority V1	Super Majority V2	V1	V2	V1	V2	V1	V2
TOTAL	35	27 affirmative 1 in opposition	11 affirmative 18 in opposition 14 ballots received	77%	31%	Y	N – fails Transmission, Marketer/Broker and Independent Grid Operators	Passes Super Majority Vote	Fails to garner supermajority and fails to garner 40% of all segments

Other Participant Attendance

Participant	Organization	Attendance
Tom Bowe	PJM	Phone
Jim Busbin	Southern Company	Phone
Ernie Cardone	New York ISO	Phone
Cory Cummings	NAESB	In Person
Deonne Cunningham	NAESB	In Person
Chuck Feagans	Tennessee Valley Authority	Phone
Shay LaBray	PacifiCorp	In Person
Pedro Lagos	Alberta Electric Operator	Phone
Bill Lohrman	FERC	In Person
Rae McQuade	NAESB	In Person
Abbey Nulph	Bonneville Power Company	Phone
Katy Onnen	Southwest Power Pool	Phone
Marcie Otondo	Arizona Public Service	In Person
Donna Pratt	NYISO	Phone
Denise Rager	NAESB	In Person
Barbara Rehman	Bonneville Power Administration	Phone

Other Participant Attendance

Participant	Organization	Attendance
Narinder Saini	Entergy	In Person
Veronica Thomason	NAESB	In Person
Jill Webb	Preferred Legal	In Person
Eric Winkler	ISO-NE	Phone

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS Subcommittees**
Request No.: **2008 AP 6.h (R06006)**
Request Title: **Develop standards to allow for registered Market Operators to request changes to the Market Level profile of Implemented Interchange.**

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
__X Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___Change to Existing Practice
__X Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
___Modification	___Modification
___Interpretation	___Interpretation
_X__Withdrawal	_X__Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	_X_Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

Standards Request (R06006) was originally submitted by the JISWG on February 23, 2006. The description of the request stated:

> *Registered Market Operators may request changes to the Market Level profile of Implemented Interchange. Such change requests only require the approval of the Source and Sink Balancing Authorities and will not be deemed Late.*
>
> *To support this change, the e-Tag specification will need to be modified as follows: the processing of Market Level profile change requests submitted by registered Market Operators will utilize the same timing and approval mechanisms as Reliability Level profile change requests.*

Upon review of this standards request the Joint Interchange Scheduling Working Group has determined that the changes suggested under this recommendation have been

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
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addressed through Section 4.6.1.2 Submitting a Profile Change of the Electronic Tagging Functional Specification Version 1.8 posted on the NERC website at: http://www.nerc.com/docs/oc/jiswg/e-tag-spec-v-18-20071107.pdf

RECOMMENDED STANDARDS:

No new standards or changes to existing standards are proposed.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

2008 WEQ Annual Plan Item 6.h – Develop standards to allow for registered Market Operators to request changes to the Market Level profile of Implemented Interchange (R06006)

b. Description of Recommendation:

The Joint Interchange Scheduling Working Group is recommending that no further action be taken on this Annual Plan Item.

c. Business Purpose:

Allow for registered Market Operators to request changes to the Market Level profile of Implemented Interchange.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

During its January 14, 2009, meeting the Joint Interchange Scheduling Working Group reviewed the WEQ 2008 Annual Plan item 6.h. As a result of this review, the Joint Interchange Scheduling Working Group has determined that the standards request has already been addressed through Version 1.8 of the Electronic Tagging Functional Specification, see section 4.6.1.2 Submitting a Profile Change Request.

Please review the following Joint Intechange Scheduling Working Group meeting minutes:

- January 14-15 2009 (unavailable)

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittees**
Request No.:	**2008 AP 6.h (R06006)**
Request Title:	**Develop standards to allow for registered Market Operators to request changes to the Market Level profile of Implemented Interchange.**

Entergy agrees with the Recommendation that No Action needs to be taken, no new standards or changes are needed.

Ed Davis
March 2, 2009

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

1. RECOMMENDED ACTION:

_X_ Accept as requested
___ Accept as modified below
___ Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

_X_ Change to Existing Practice
___ Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___ Initiation	___ Initiation
_X_ Modification	_X_ Modification
___ Interpretation	___ Interpretation
___ Withdrawal	___ Withdrawal
___ Principle	___ Principle
___ Definition	___ Definition
_X_ Business Practice Standard	_X_ Business Practice Standard
___ Document	___ Document
___ Data Element	___ Data Element
___ Code Value	___ Code Value
___ X12 Implementation Guide	___ X12 Implementation Guide
___ Business Process Documentation	___ Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The Commission issued Order 717 which changed the posting requirements associated with the Standards of Conduct.

RECOMMENDED STANDARDS:

The following modifications to WEQ-001, WEQ-002 and WEQ-003 are recommended to implement the Commission's findings in Order 717.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

Modifications to WEQ-001
(Changed Requirements)

001-13.1 **OASIS HOME PAGE**

The Transmission Provider shall establish the following HTML hyperlinks to standardized information postings of a general (i.e., non-template) nature located on the Transmission Provider's OASIS Home Page at their registered OASIS URL address. These links must appear as named and in the following order:

NAESB Home Page

~~***Standards of Conduct***~~

Performance Metrics

Business Practices, Waivers, and Exemptions

ATC Information

Nothing in this standard shall preclude the Transmission Provider from establishing additional hyperlinks or making additional content available on their OASIS Home Page.

~~In the case where a Transmission Provide has several Transmission Owners, the TO's are subject to the Standards of Conduct links and information, In that case, the Transmission Provider will have links to the individual Transmission Owner's websites. The Transmission Owners websites will follow section WEQ-001-13.1.2.~~

001-13.1.2 ~~STANDARDS OF CONDUCT LINK~~ Reserved

~~The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g,* Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g,* Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the "***Standards of Conduct***" link displayed on the Transmission Provider's OASIS Home Page.~~

~~***Emergency Circumstances Deviations*** (§358.4(a)(2))~~

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

~~***Marketing and Energy Affiliate List*** (§358.4(b)(1))~~

~~***Shared Facilities*** (§358.4(b)(2))~~

~~***Organizational Charts and Job Descriptions*** (§358.4(b)(3)(i))~~

~~***Common Employees*** (§358.4(b)(3)(iii))~~

~~***Potential Merger Partners*** (§358.4(b)(3)(v))~~

~~***Transfers***[1] (§358.4(c))~~

~~***Information Disclosure***[2] (§358.5(b) (3))~~

~~***Voluntary Consent to Share Non-Affiliated Customer Information*** (§358.5(b)(4))~~

~~***Discretionary Actions under Tariff***[3] (§358.5(c)(4))~~

~~***Discounts***[4] (§358.5(d))~~

~~***Chief Compliance Officer*** (§358.4(e)(6))~~

~~***Written Procedures for Implementation*** (§358.4 (e)(3))~~

~~These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to Standards of Conduct. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to Standard WEQ-002-3.1~~

001-21.3.1.2.2 ~~Any such waiver of the Biennial Reassessment shall be posted on OASIS as a discretionary action under the Tariff in accordance with Standards WEQ-002 and WEQ-013 such that this information may be queried and viewed using the ***discretion*** template.~~ Reserved

001-C.4 ~~Requirements related to posting of information under the Standards of Conduct Link documented in Standard WEQ-002 Business Practices for Open Access~~

[1] ~~According to Standard WEQ-002-4.3.10.4 a template is required for this item.~~
[2] ~~According to Standard WEQ-002-4.3.10.6 a template is required for this item.~~
[3] ~~According to Standard WEQ-002-4.3.10.5 a template is required for this item.~~
[4] ~~According to Standard WEQ-002-4.3.2.1 a template is required for this item.~~

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

~~Same-Time Information Systems (OASIS) Standards and Communications Protocols do not apply to RTOs and ISOs.~~ Reserved

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **BPS Subcommittee**
Request No.: **2009 AP 3(d)**
Request Title: **Order 717, Standards of Conduct**

Modifications to WEQ-002
(Changed Requirements)

002-3.4 PROVIDER UPDATING REQUIREMENTS

b. **General Postings**

(i) INFO.HTM

(ii) ~~Standards of Conduct~~ Reserved

~~The Transmission Provider shall establish a link entitled "Standards of Conduct," located on the OASIS home page at the Transmission Provider's registered URL address.~~

02-4.3.1 **Template Summary**

Process Area	Process Name	Template(s)
4.3.10 Informal Messages	Post Want Ads (Input)	messagepost
	Query/Response Want Ads	message
	Delete Want Ad (Input)	messagedelete
	Personnel Transfers	Personnel (optional template to be implemented at Transmission Provider's discretion)
	Discretion	discretion (optional template to be implemented at Transmission Provider's discretion)
	Standards of Conduct	stdconduct (optional template to be implemented at Transmission Provider's

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **BPS Subcommittee**
Request No.: **2009 AP 3(d)**
Request Title: **Order 717, Standards of Conduct**

Process Area	Process Name	Template(s)
		discretion)

002-4.3.10.4 Personnel Transfers (personnel)

~~The Personnel Transfers (***personnel)*** Template is used to indicate when personnel are transferred between the merchant function and the Transmission Provider function as required by Standards of Conduct WEQ-009 or applicable regulations.~~

The Personnel Transfers (***personnel)*** Template is used to post a notice of a transfer of a transmission function employee to a position as a marketing function employee, or a transfer of a marketing function employee to a position as a transmission function employee, as described in 18 CFR Part 358. The ***personnel*** template is an optional template to be implemented at the Transmission Provider's discretion.

002-4.3.10.5 Discretion (discretion) Reserved

~~The Discretion (***discretion)*** Template is used to describe the circumstances when discretion was exercised in applying terms of the tariff, as described in the Standards of Conduct WEQ-009 or applicable regulations.~~

The Discretion (***discretion)*** Template is used to post a notice of a waiver of a tariff provision that a Transmission Provider grants in favor of an affiliate, as described in 18 CFR Part 358. The ***discretion*** template is an optional template to be implemented at the Transmission Provider's discretion.

002-4.3.10.6 Standards of Conduct (stdconduct)

The Standards of Conduct (***stdconduct)*** Template indicates when information is disclosed in a manner contrary to the standards of conduct, as described in 18 CFR Part 358.~~the Standards of Conduct WEQ-009 or applicable regulations~~. The ***stdconduct*** template is an optional template to be implemented at the Transmission Provider's discretion.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

002-4.3.11 **Audit Log**

The OASIS audit log report facility shall be implemented by the definition of the following Templates:

transofferingaudit	- audit counterpart to ***transoffering***
ancofferingaudit	- audit counterpart to ***ancoffering***
scheduledetailaudit	- audit counterpart to ***scheduledetail***
securityaudit	- audit counterpart to ***security***
systemdataaudit	- audit counterpart to ***systemdata***
transstatusaudit	- audit counterpart to ***transstatus***
ancstatusaudit	- audit counterpart to ***ancstatus***
personnelaudit*	- audit counterpart to ***personnel***
discretionaudit*	- audit counterpart to ***discretion***
stdconductaudit*	- audit counterpart to ***stdconduct***

Each of these audit Templates is an extension to the OASIS Template definitions of their non-audit counterparts. The requirements for implementation of the audit Templates are defined in the following sections.

*A Transmission Provider is only required to implement the audit log templates ***personnelaudit***, ***discretionaudit***, and ***stdconductaudit*** if and when the Transmission Provider also uses the ***personnel***, ***discretion***, ***stdconduct*** templates for posting Standards of Conduct information required under 18 CFR Part 358.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **BPS Subcommittee**
Request No.: **2009 AP 3(d)**
Request Title: **Order 717, Standards of Conduct**

Modifications to WEQ-003
(Changed Requirements)

003-0 OASIS DATA DICTIONARY, Version 1.5				
Data Dictionary Element Name	**Alias**	**Field Format : minimum characters {type of ASCII} maximum characters**	**Restricted Values**	**Definition of Data Element**
DISCRETION_DESCRIPTION	DISCDESC	0{ALPHANUMERIC}1000	Free form text	A detailed description of the waiver ~~discretion~~ being posted ~~reported~~. The ***discretion*** template and the related DISCRETION_DESCRIPTION data element are an optional implementation at the Transmission Provider's discretion.
EMPLOYEE_NAME	EMPNAME	1{ALPHANUMERIC}25	Free form text	Name of person who is transferring from one position to another. The ***personnel*** template and the related EMPLOYEE_NAME data element are an optional implementation at the Transmission Provider's discretion.
FORMER_COMPANY	FORMCO	1{ALPHANUMERIC}25	Free form text	Former company of the person who is transferring. The ***personnel*** template and the related FORMER_COMPANY data element are an optional implementation at the Transmission Provider's discretion.
FORMER_DEPARTMENT	FORMDEPT	1{ALPHANUMERIC}52	Free form text	Former department of the person who is transferring. The ***personnel*** template and the related FORMER_DEPARTMENT data element are an optional implementation at the Transmission Provider's discretion.
FORMER_POSITION	FORMPOS	1{ALPHANUMERIC}25	Free form text	Former position held by the person who is transferring. The ***personnel*** template and the related FORMER_POSITION data element are an optional implementation at the Transmission Provider's discretion.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **BPS Subcommittee**
Request No.: **2009 AP 3(d)**
Request Title: **Order 717, Standards of Conduct**

003-0 OASIS DATA DICTIONARY, Version 1.5				
Data Dictionary Element Name	**Alias**	**Field Format : minimum characters {type of ASCII} maximum characters**	**Restricted Values**	**Definition of Data Element**
NEW_COMPANY	NEWCO	1{ALPHANUMERIC}25	Free form text	New company of the person who is transferring. The ***personnel*** template and the related NEW_COMPANY data element are an optional implementation at the Transmission Provider's discretion.
NEW_DEPARTMENT	NEWDEPT	1{ALPHANUMERIC}52	Free form text	New department of the person who is transferring. The ***personnel*** template and the related NEW_DEPARTMENT data element are an optional implementation at the Transmission Provider's discretion.
NEW_POSITION	NEWPOS	1{ALPHANUMERIC}25	Free form text	New position held by the person who is transferring. The ***personnel*** template and the related NEW_POSITION data element are an optional implementation at the Transmission Provider's discretion.
RESPONSIBLE_PARTY _NAME	PARTNAME	1{ALPHANUMERIC}25	Free form text	The name of the person responsible for granting the waiver ~~discretion~~. The ***discretion*** template and the related RESPONSIBLE_PARTY_NAME data element are an optional implementation at the Transmission Provider's discretion.
STANDARDS_OF_CONDUCT _ISSUES	STDISSUE	0{ALPHANUMERIC}800	Free form text	Information disclosures ~~Issues~~ that were in violation of the FERC Standards of Conduct described in 18 CFR Part 358. This text may include a reference pointer to a more detailed description. The ***stdconduct*** template and the related STANDARDS_OF_CONDUCT_ISSUES data element are an optional implementation at the Transmission Provider's discretion.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **BPS Subcommittee**
Request No.: **2009 AP 3(d)**
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4. SUPPORTING DOCUMENTATION

a. Description of Request:

WEQ 2009 AP

3 Develop business practices standards to improve the current operation of the wholesale electric market and develop and maintain business practice and communication standards for OASIS and Electronic Scheduling

d) Develop business practice standards in support of FERC Order No. 717 2009 BPS

FERC Orders

In FERC Order No. 717 under Docket No. RM07-1-000 issued October 16, 2008, the Commission made the following conclusions regarding posting requirements associated with the Standards of Conduct [note that while paragraph numbers correlate with FERC Order No. 717, the footnote numbers do not]:

III. Discussion

E. Transparency Rule

1. Waivers and Exercises of Discretion

C. Commission Determination

213. Proposed section 358.4, which generally deals with non-discrimination requirements, also contains the posting requirements for notices of waivers, notices of exercises of discretion, and discounts. Inasmuch as these posting aspects of the proposed section relate to the Transparency Rule, we move them to section 358.7, which includes the other posting requirements under the Standards. Further, in response to NGSA's request, we clarify that section 358.4 as a whole, as well as the posting requirements moved to section 358.7, apply to all transmission providers, in accordance with the limitations set forth in section 358.1.

214. Commenters had no objections to the general requirements of section 358.4, other than regarding waivers, exercises of discretion and discounts. The Commission is persuaded by the arguments of many commenters that a blanket requirement to post all waivers and exercises of discretion goes beyond what is needed to alert customers and others to possible acts of undue discrimination or preferences in favor of an affiliate. Furthermore, such posting is in some cases redundant to the posting requirements set forth elsewhere in our regulations. Therefore, although the Commission confirms the substantive non-discrimination

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requirements of section 358.4, we modify the posting requirements in a number of ways.

215. As a preliminary matter, the Commission clarifies that for these purposes, a waiver is considered to be a determination to do or not do something that is specifically required to be done or not done by the transmission provider's tariff. An act of discretion, on the other hand, is an action that is within the scope of the tariff provision in question, and which typically involves an exercise of judgment on the part of the transmission provider. The Commission has in some cases approved tariffs for interstate pipelines that grant the pipeline the right to waive compliance with provisions of its tariff, typically for a given entity for a limited term.[5] We will continue to require transmission providers to record in a log such waivers, if granted in favor of an affiliate, and to post the log on the transmission provider's Internet website (however, if a specific waiver is approved by Commission order, such waiver need not be posted as it will already be public). We also add a definition of waiver to the regulatory text, to read: "Waiver means the determination by a transmission provider, if authorized by its tariff, to waive any provisions of its tariff for a given entity." See section 358.3(m). Limiting the recording of waivers to those in favor of an affiliate will reduce the administrative burden on the pipeline, while capturing any instances of potential undue discrimination.

216. The Commission further determines that transmission providers need not post exercises of discretion that are within the scope of a tariff provision, unless in any given instance such posting is required under any other of our regulations. Such acts are already permitted by the tariff, and therefore fall within the scope of matters which the Commission has approved. Furthermore, a transmission provider, in particular a pipeline, makes many of these judgment calls every day on an ongoing basis; recording all these matters would place a substantial administrative burden on it.

217. The Commission declines to modify the proposed five-year retention requirement for recordation of the acts of waiver, as the five-year period will better enable Commission staff to monitor compliance.[6] Records may be examined only periodically, as when an audit is performed, and therefore earlier deletion could impede the necessary review. However, we observe that the volume of material to be retained should be substantially reduced, in light of the Final Rule's more circumscribed reporting requirements.

[5] See, e.g., CenterPoint Energy Gas Transmission Company FERC Gas Tariff, Sixth Revised Volume No. 1, § 15.1.

[6] See also our discussion above concerning the five-year retention period for certain information exchanges under section 358.7(h).

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218. The Commission further clarifies that where the information called for under the posting requirements of the Standards is duplicative of information required to be posted by transmission providers under other provisions of our regulations or orders, such as the posting requirements of 18 CFR part 284 and 18 CFR part 37, only a single posting is required, and the transmission provider is to follow the posting requirements, inclusive of substance, venue, and timing, of the other regulations or orders. We believe the posting requirements contained in such regulations or orders are sufficient to fulfill the transparency goals of the Standards of Conduct. Inasmuch as discount information is required to be posted both for the gas and electric industries under other provisions of our regulations, we delete proposed section 358.4(b), which had set forth proposed requirements for the posting of discount information. Also, if a transmission owner is a member of an RTO or ISO and has not participated in the granting of a discount by the RTO or ISO, it would not be subject to the obligation to post such discounts.

2. Other Posting Requirements

C. Commission Determination

i. <u>Contemporaneous Disclosure</u>

235. Section 358.7(a)(1) requires that if non-public transmission function information is disclosed to a marketing function employee, the transmission provider must post the information on its website. Some commenters object to the posting requirement where non-public information is disclosed by the transmission provider, arguing that such posting will provide an advantage to a competitor. We disagree. Such posting, by making the information public, will place the competitor and the transmission provider's affiliated marketer on an even footing. Therefore, this provision will be retained.

236. Western Utilities and INGAA raise concerns over the posting provision in instances where a marketing affiliate receives non-public transmission function information from a third party. Since we are eliminating that particular prohibition of the No Conduit Rule, no change to the posting provision is necessary. However, we note that if a transmission provider uses anyone as a conduit for improper disclosures, such an event would be considered an improper disclosure and should be posted.

237. The Commission proposed in section 358.7(a)(2) that only a notice be posted in the event non-public transmission customer information is improperly disclosed, rather than requiring posting of the disclosure itself, to prevent a further breach of confidentiality. We extend this distinction between posting of a

notice and posting the disclosure itself to include CEII,[7] as well as any other information that the Commission by law has determined is to be subject to limited dissemination. However, we decline to extend it to cover information where disclosure may be deemed to breach some other public policy goal, as requested by National Grid. This standard is too imprecise to have practical application. If a transmission provider is concerned about disclosure in any given instance, it may seek guidance from the Commission.

238. We decline to adopt ATC's proposal that with respect to non-public transmission information that was improperly disclosed, the transmission provider must post it immediately "upon discovery of disclosure," rather than upon the actual disclosure. The provision by its terms imposes the posting requirement on a transmission provider that wrongfully discloses such information, and it would be anomalous to assume the transmission provider was not aware of its own actions. A corporation can only act through its agents and employees, and those actions are taken on behalf of the corporation. Therefore, knowledge of the disclosure is imputed to the transmission provider, which is responsible both for the disclosure and for the posting.

ii. Specific Transaction Information

239. Section 358.7(b) provides an exemption to the disclosure requirement for requests for transmission service made by a marketing function employee. The Commission agrees that the language should be modified to clarify that transmission function employees may discuss with marketing function employees the latter's specific request for transmission service (but not non-public matters beyond the specific request, such as outages or other system conditions). We therefore add the following sentence: "A transmission provider's transmission function employee may discuss with its marketing function employee a specific request for transmission service submitted by the marketing function employee."

iii. Voluntary Consent Provision

240. The Commission declines to move the provision regarding the posting of voluntary employee consents in section 358.7(c) to the Independent Functioning Rule, as requested by SCE. The provision in question relates to posting, and is

[7] This limitation does not affect our determinations made elsewhere regarding the need to disclose information that may contain CEII, or the appropriate methods for entities to access such CEII, nor our adoption of mandatory reliability standards for CEII. See, e.g., Order 890 at P 403-404; Mandatory Reliability Standards for Critical Infrastructure Protection, Order No. 706, 73 Fed. Reg. 7368 (Feb. 7, 2008), 122 FERC ¶ 61,040, reh'g denied and clarification granted, Order No. 706-A ,123 FERC ¶ 61,174 (2008).

therefore appropriately included in the Transparency Rule. We also decline to include a specific exclusion to the customer consent provision for contracts involving generator output, as requested by MidAmerican. The posting requirements are general in application, and ought not to be so detailed as to cover every special circumstance that may apply to only one or a limited number of transmission providers. To do so would make the regulations unwieldy and subject to constant change. Therefore, we decline to include an exclusion covering a customer's consent for contracts involving generator output.

241. Furthermore, we decline to distinguish between affiliated and non-affiliated customers in connection with the voluntary consent provision. The intent of the provision is to permit any customer to disclose customer information to marketing function employees of the transmission provider, should it desire to do so. Of course, an affiliated customer will already be aware of information pertaining to its own marketing affiliate, but there conceivably could be other marketing affiliates of the same transmission provider as to which the customer may wish to give its consent for disclosure.

242. The Commission agrees that the voluntary consent provision refers to non-public customer information (including a customer's transmission request and accompanying information), and adds this phrase to section 358.7(c).

iv. Identification of Affiliate Information

243. Section 358.7(e)(1) provides that a transmission provider post the names and addresses of all its affiliates that employ or retain marketing function employees. The Commission declines to revert to a requirement to post an organizational chart of all affiliates of a transmission provider, and further declines to extend this to a color-coded chart. With the elimination from the Standards of the concept of energy affiliates, it is only necessary to be concerned with the marketing affiliates of a transmission provider. Therefore, an entire organizational chart is unnecessary, and an undue burden on transmission providers.

244. With respect to INGAA's request that information need not be posted about affiliates that do not, for instance, hold or control capacity on its affiliated pipeline, the Commission notes that the proposed provision applies to affiliates "that employ or retain marketing function employees." If an activity falls within one of the exclusions to the definition of marketing functions set forth in proposed section 358.3(c), its employees will not by definition be marketing function employees, and the posting rule would not apply. If, however, the activities do not fall within any of the exclusions to the definition, and the affiliate employs or retains marketing function employees, the posting provision would apply.

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245. We agree with MidAmerican and ATC that the posting requirements in section 358.7(e)(2) regarding shared facilities need not include facilities where transmission function employees and marketing function employees do not both transact their job-related activities, and modify the regulatory text accordingly. We further clarify that the phrase "employee-staffed facilities" is meant to exclude facilities where individuals do not typically transact business, such as substations.

v. Identification of Employee Information

246. The Commission agrees with EEI that the proposed provision in section 358.7(f)(1) covering the posting of job titles and names of transmission function employees should conform more closely to the employee functional approach. Furthermore, in accordance with the clarification made in this Final Rule, such jobs as maintenance and field positions are not considered transmission functions, unless the employees also engage in the day-to-day operation of the transmission system. Therefore, we will modify the wording of this provision to refer only to "transmission function employees," and delete the reference to clerical, maintenance and field positions.

vi. Timing and General Requirements of Postings

247. Section 358.7(g)(1) requires updated posting on a transmission provider's OASIS or Internet website. The Commission agrees with SCE that transmission owners who are members of RTOs or ISOs might not have their own OASIS. Furthermore, some interested entities or individuals might not have access to a transmission provider's OASIS. We therefore modify the venue for posting to require that the posting of information required under the Standards for both public utilities and interstate pipelines is to be made on the transmission provider's website, where it will be accessible to all interested entities. The various sections within the Transparency Rule are amended to conform to this change.

248. Section 358.7(g)(2) provides suspension of postings in the case of emergencies. The Commission does not deem it necessary to list every conceivable natural disaster in this provision, but will add "earthquakes" to the list, as requested by SCE. Chandeleur requests clarification as to the method of implementation of this provision. In the event the transmission provider needs suspension of postings beyond one month, it should publicly file with the Commission for a further period of suspension, in accordance with the provisions of part 385 of the Commission's regulations.

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vii. Other

249. Chandeleur suggests the Commission provide an anticipatory waiver of any changes to NAESB standards which may be made relating to the format and content of posting requirements, should they be inconsistent with the Standards here adopted. The NAESB standards currently adopted by the Commission are set forth in 18 CFR sections 38.2 and 284.12 (2008), and relate to matters other than the Standards of Conduct. The provisions applicable to electric utilities in section 38.2 include the Business Practices for Open Access Same-Time Information Systems (OASIS), which relate to requests for transmission service. The provisions applicable to pipelines in section 284.12 include information which is to be posted on the pipeline's Internet website, covering such matters as the name of shippers taking service, the rate charged, the duration of the contract, receipt and delivery points, quantity, whether the shipper is an affiliate of the pipeline, and the like. These postings generally differ from the postings required under the Standards of Conduct. As discussed above, to the extent any of the information required under the Standards of Conduct is also required under other regulations or orders, duplicative postings are not required. Therefore, no anticipatory waiver of the type requested by Chandeleur is needed or appropriate.

b. Description of Recommendation:

Paragraph 247 of FERC Order 717 modified the venue for posting the required standards of conduct information. Because public (electric) utilities are no longer required to post the information on their OASIS, it is appropriate to remove the requirement from the NAESB WEQ Business Practice Standards. However, the template structures for ***personnel***, ***discretion*** and ***stdconduct*** have been retained in the NAESB Business Practice Standards and may, at the option of the Transmission Provider, be implemented.

c. Business Purpose:

Implementation of FERC Order 717.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):
Supporting Documentation:

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- WEQ Business Practices Subcommittee Meeting Minutes:
  - February 9, 2009
  - March 9, 2009
  - March 23, 2009 (unavailable – DC)
- Motions Document

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1. RECOMMENDED ACTION:

_X_ Accept as requested
___ Accept as modified below
___ Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

_X_ Change to Existing Practice
___ Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___ Initiation	___ Initiation
_X_ Modification	_X_ Modification
___ Interpretation	___ Interpretation
___ Withdrawal	___ Withdrawal
___ Principle	___ Principle
___ Definition	___ Definition
_X_ Business Practice Standard	_X_ Business Practice Standard
___ Document	___ Document
___ Data Element	___ Data Element
___ Code Value	___ Code Value
___ X12 Implementation Guide	___ X12 Implementation Guide
___ Business Process Documentation	___ Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The Commission issued Order 717 which changed the posting requirements associated with the Standards of Conduct.

RECOMMENDED STANDARDS:

The following modifications to WEQ-001, WEQ-002 and WEQ-003 are recommended to implement the Commission's findings in Order 717.

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Modifications to WEQ-001
(Changed Requirements)

001-13.1 **OASIS HOME PAGE**

The Transmission Provider shall establish the following HTML hyperlinks to standardized information postings of a general (i.e., non-template) nature located on the Transmission Provider's OASIS Home Page at their registered OASIS URL address. These links must appear as named and in the following order:

NAESB Home Page

~~***Standards of Conduct***~~

Performance Metrics

Business Practices, Waivers, and Exemptions

ATC Information

Nothing in this standard shall preclude the Transmission Provider from establishing additional hyperlinks or making additional content available on their OASIS Home Page.

~~In the case where a Transmission Provide has several Transmission Owners, the TO's are subject to the Standards of Conduct links and information, In that case, the Transmission Provider will have links to the individual Transmission Owner's websites. The Transmission Owners websites will follow section WEQ-001-13.1.2.~~

001-13.1.2 ~~STANDARDS OF CONDUCT LINK~~ Reserved

~~The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g*, Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g*, Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the "***Standards of Conduct***" link displayed on the Transmission Provider's OASIS Home Page.~~

~~***Emergency Circumstances Deviations*** (§358.4(a)(2))~~

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~~***Marketing and Energy Affiliate List*** (§358.4(b)(1))~~

~~***Shared Facilities*** (§358.4(b)(2))~~

~~***Organizational Charts and Job Descriptions*** (§358.4(b)(3)(i))~~

~~***Common Employees*** (§358.4(b)(3)(iii))~~

~~***Potential Merger Partners*** (§358.4(b)(3)(v))~~

~~***Transfers***[1] (§358.4(c))~~

~~***Information Disclosure***[2] (§358.5(b) (3))~~

~~***Voluntary Consent to Share Non-Affiliated Customer Information*** (§358.5(b)(4))~~

~~***Discretionary Actions under Tariff***[3] (§358.5(c)(4))~~

~~***Discounts***[4] (§358.5(d))~~

~~***Chief Compliance Officer*** (§358.4(e)(6))~~

~~***Written Procedures for Implementation*** (§358.4 (e)(3))~~

~~These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to Standards of Conduct. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to Standard WEQ-002-3.1~~

01-21.3.1.2.2 ~~Any such waiver of the Biennial Reassessment shall be posted on OASIS as a discretionary action under the Tariff in accordance with Standards WEQ-002 and WEQ-013 such that this information may be queried and viewed using the ***discretion*** template.~~ Any such waiver of the Biennial Reassessment shall be posted by the Transmission Provider in the same manner as it posts notices of any waivers of tariff provisions that it grants in favor of an affiliate, as described in 18 CFR Part 358.

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~~[1] According to Standard WEQ-002-4.3.10.4 a template is required for this item.~~
~~[2] According to Standard WEQ-002-4.3.10.6 a template is required for this item.~~
~~[3] According to Standard WEQ-002-4.3.10.5 a template is required for this item.~~
~~[4] According to Standard WEQ-002-4.3.2.1 a template is required for this item.~~

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[CVB – Entergy recommends including some sort of language addressing the posting of waivers because, in accordance with Order 890A at paragraph 585, FERC anticipated some kind of posting to inform similarly situated customers of the waiver as it may be applicable to them. See the references from 890A below.]

Waiver of the reassessment presents an opportunity for discrimination among classes of customers on the part of the transmission provider and posting will provide eligible customers with an indicator of how often conditions or redispatch requirements have been reassessed. Transmission providers are directed to develop uniform OASIS posting standards, in coordination with NAESB, for transmission providers to post information regarding waivers of the biennial reassessment for planning redispatch and conditional firm service.

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001-C.4 ~~Requirements related to posting of information under the Standards of Conduct Link documented in Standard WEQ-002 Business Practices for Open Access Same-Time Information Systems (OASIS) Standards and Communications Protocols do not apply to RTOs and ISOs.~~ Reserved

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Modifications to WEQ-002
(Changed Requirements)

002-3.4 PROVIDER UPDATING REQUIREMENTS

b. **General Postings**

(i) INFO.HTM

(ii) ~~Standards of Conduct~~ Reserved

~~The Transmission Provider shall establish a link entitled "Standards of Conduct," located on the OASIS home page at the Transmission Provider's registered URL address.~~

02-4.3.1 **Template Summary**

Process Area	Process Name	Template(s)
4.3.10 Informal Messages	Post Want Ads (Input)	messagepost
	Query/Response Want Ads	message
	Delete Want Ad (Input)	messagedelete
	Personnel Transfers	Personnel (optional template to be implemented at Transmission Provider's discretion)
	Discretion	discretion (optional template to be implemented at Transmission Provider's discretion)
	Standards of Conduct	stdconduct (optional template to be implemented at Transmission Provider's

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Process Area	Process Name	Template(s)
		discretion)

002-4.3.10.4 Personnel Transfers (personnel)

~~The Personnel Transfers (***personnel)*** Template is used to indicate when personnel are transferred between the merchant function and the Transmission Provider function as required by Standards of Conduct WEQ-009 or applicable regulations.~~

The Personnel Transfers (***personnel)*** Template is used to post a notice of a transfer of a transmission function employee to a position as a marketing function employee, or a transfer of a marketing function employee to a position as a transmission function employee, as described in 18 CFR Part 358. The ***personnel*** template is an optional template to be implemented at the Transmission Provider's discretion.

002-4.3.10.5 Discretion (discretion) Reserved

~~The Discretion (***discretion)*** Template is used to describe the circumstances when discretion was exercised in applying terms of the tariff, as described in the Standards of Conduct WEQ-009 or applicable regulations.~~

The Discretion (***discretion)*** Template is used to post a notice of a waiver of a tariff provision that a Transmission Provider grants in favor of an affiliate, as described in 18 CFR Part 358. The ***discretion*** template is an optional template to be implemented at the Transmission Provider's discretion.

002-4.3.10.6 Standards of Conduct (stdconduct)

The Standards of Conduct (***stdconduct)*** Template indicates when information is disclosed in a manner contrary to the standards of conduct, as described in 18 CFR Part 358.~~the Standards of Conduct WEQ-009 or applicable regulations~~. The ***stdconduct*** template is an optional template to be implemented at the Transmission Provider's discretion.

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002-4.3.11 **Audit Log**

The OASIS audit log report facility shall be implemented by the definition of the following Templates:

transofferingaudit	- audit counterpart to ***transoffering***
ancofferingaudit	- audit counterpart to ***ancoffering***
scheduledetailaudit	- audit counterpart to ***scheduledetail***
securityaudit	- audit counterpart to ***security***
systemdataaudit	- audit counterpart to ***systemdata***
transstatusaudit	- audit counterpart to ***transstatus***
ancstatusaudit	- audit counterpart to ***ancstatus***
personnelaudit*	- audit counterpart to ***personnel***
discretionaudit*	- audit counterpart to ***discretion***
stdconductaudit*	- audit counterpart to ***stdconduct***

Each of these audit Templates is an extension to the OASIS Template definitions of their non-audit counterparts. The requirements for implementation of the audit Templates are defined in the following sections.

*A Transmission Provider is only required to implement the audit log templates ***personnelaudit***, ***discretionaudit***, and ***stdconductaudit*** if and when the Transmission Provider also uses the ***personnel***, ***discretion***, ***stdconduct*** templates for posting Standards of Conduct information required under 18 CFR Part 358.

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Modifications to WEQ-003
(Changed Requirements)

003-0 OASIS DATA DICTIONARY, Version 1.5				
Data Dictionary Element Name	**Alias**	**Field Format : minimum characters {type of ASCII} maximum characters**	**Restricted Values**	**Definition of Data Element**
DISCRETION_DESCRIPTION	DISCDESC	0{ALPHANUMERIC}1000	Free form text	A detailed description of the waiver ~~discretion~~ being posted ~~reported~~. The ***discretion*** template and the related DISCRETION_DESCRIPTION data element are an optional implementation at the Transmission Provider's discretion.
EMPLOYEE_NAME	EMPNAME	1{ALPHANUMERIC}25	Free form text	Name of person who is transferring from one position to another. The ***personnel*** template and the related EMPLOYEE_NAME data element are an optional implementation at the Transmission Provider's discretion.
FORMER_COMPANY	FORMCO	1{ALPHANUMERIC}25	Free form text	Former company of the person who is transferring. The ***personnel*** template and the related FORMER_COMPANY data element are an optional implementation at the Transmission Provider's discretion.
FORMER_DEPARTMENT	FORMDEPT	1{ALPHANUMERIC}52	Free form text	Former department of the person who is transferring. The ***personnel*** template and the related FORMER_DEPARTMENT data element are an optional implementation at the Transmission Provider's discretion.
FORMER_POSITION	FORMPOS	1{ALPHANUMERIC}25	Free form text	Former position held by the person who is transferring. The ***personnel*** template and the related FORMER_POSITION data element are an optional implementation at the Transmission Provider's discretion.

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003-0 OASIS DATA DICTIONARY, Version 1.5

Data Dictionary Element Name	Alias	Field Format : minimum characters {type of ASCII} maximum characters	Restricted Values	Definition of Data Element
NEW_COMPANY	NEWCO	1{ALPHANUMERIC}25	Free form text	New company of the person who is transferring. The ***personnel*** template and the related NEW_COMPANY data element are an optional implementation at the Transmission Provider's discretion.
NEW_DEPARTMENT	NEWDEPT	1{ALPHANUMERIC}52	Free form text	New department of the person who is transferring. The ***personnel*** template and the related NEW_DEPARTMENT data element are an optional implementation at the Transmission Provider's discretion.
NEW_POSITION	NEWPOS	1{ALPHANUMERIC}25	Free form text	New position held by the person who is transferring. The ***personnel*** template and the related NEW_POSITION data element are an optional implementation at the Transmission Provider's discretion.
RESPONSIBLE_PARTY _NAME	PARTNAME	1{ALPHANUMERIC}25	Free form text	The name of the person responsible for granting the waiver ~~discretion~~. The ***discretion*** template and the related RESPONSIBLE_PARTY_NAME data element are an optional implementation at the Transmission Provider's discretion.
STANDARDS_OF_CONDUCT _ISSUES	STDISSUE	0{ALPHANUMERIC}800	Free form text	Information disclosures ~~Issues~~ that were in violation of the FERC Standards of Conduct described in 18 CFR Part 358. This text may include a reference pointer to a more detailed description. The ***stdconduct*** template and the related STANDARDS_OF_CONDUCT_ISSUES data element are an optional implementation at the Transmission Provider's discretion.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

4. SUPPORTING DOCUMENTATION

a. Description of Request:

WEQ 2009 AP

3 Develop business practices standards to improve the current operation of the wholesale electric market and develop and maintain business practice and communication standards for OASIS and Electronic Scheduling

d) Develop business practice standards in support of FERC Order No. 717 2009 BPS

FERC Orders

In FERC Order No. 717 under Docket No. RM07-1-000 issued October 16, 2008, the Commission made the following conclusions regarding posting requirements associated with the Standards of Conduct [note that while paragraph numbers correlate with FERC Order No. 717, the footnote numbers do not]:

III. Discussion

E. Transparency Rule

1. Waivers and Exercises of Discretion

C. Commission Determination

213. Proposed section 358.4, which generally deals with non-discrimination requirements, also contains the posting requirements for notices of waivers, notices of exercises of discretion, and discounts. Inasmuch as these posting aspects of the proposed section relate to the Transparency Rule, we move them to section 358.7, which includes the other posting requirements under the Standards. Further, in response to NGSA's request, we clarify that section 358.4 as a whole, as well as the posting requirements moved to section 358.7, apply to all transmission providers, in accordance with the limitations set forth in section 358.1.

214. Commenters had no objections to the general requirements of section 358.4, other than regarding waivers, exercises of discretion and discounts. The Commission is persuaded by the arguments of many commenters that a blanket requirement to post all waivers and exercises of discretion goes beyond what is needed to alert customers and others to possible acts of undue discrimination or preferences in favor of an affiliate. Furthermore, such posting is in some cases redundant to the posting requirements set forth elsewhere in our regulations. Therefore, although the Commission confirms the substantive non-discrimination

requirements of section 358.4, we modify the posting requirements in a number of ways.

215. As a preliminary matter, the Commission clarifies that for these purposes, a waiver is considered to be a determination to do or not do something that is specifically required to be done or not done by the transmission provider's tariff. An act of discretion, on the other hand, is an action that is within the scope of the tariff provision in question, and which typically involves an exercise of judgment on the part of the transmission provider. The Commission has in some cases approved tariffs for interstate pipelines that grant the pipeline the right to waive compliance with provisions of its tariff, typically for a given entity for a limited term.[5] We will continue to require transmission providers to record in a log such waivers, if granted in favor of an affiliate, and to post the log on the transmission provider's Internet website (however, if a specific waiver is approved by Commission order, such waiver need not be posted as it will already be public). We also add a definition of waiver to the regulatory text, to read: "Waiver means the determination by a transmission provider, if authorized by its tariff, to waive any provisions of its tariff for a given entity." See section 358.3(m). Limiting the recording of waivers to those in favor of an affiliate will reduce the administrative burden on the pipeline, while capturing any instances of potential undue discrimination.

216. The Commission further determines that transmission providers need not post exercises of discretion that are within the scope of a tariff provision, unless in any given instance such posting is required under any other of our regulations. Such acts are already permitted by the tariff, and therefore fall within the scope of matters which the Commission has approved. Furthermore, a transmission provider, in particular a pipeline, makes many of these judgment calls every day on an ongoing basis; recording all these matters would place a substantial administrative burden on it.

217. The Commission declines to modify the proposed five-year retention requirement for recordation of the acts of waiver, as the five-year period will better enable Commission staff to monitor compliance.[6] Records may be examined only periodically, as when an audit is performed, and therefore earlier deletion could impede the necessary review. However, we observe that the volume of material to be retained should be substantially reduced, in light of the Final Rule's more circumscribed reporting requirements.

[5] See, e.g., CenterPoint Energy Gas Transmission Company FERC Gas Tariff, Sixth Revised Volume No. 1, § 15.1.

[6] See also our discussion above concerning the five-year retention period for certain information exchanges under section 358.7(h).

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
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Requesters:	**BPS Subcommittee**
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218. The Commission further clarifies that where the information called for under the posting requirements of the Standards is duplicative of information required to be posted by transmission providers under other provisions of our regulations or orders, such as the posting requirements of 18 CFR part 284 and 18 CFR part 37, only a single posting is required, and the transmission provider is to follow the posting requirements, inclusive of substance, venue, and timing, of the other regulations or orders. We believe the posting requirements contained in such regulations or orders are sufficient to fulfill the transparency goals of the Standards of Conduct. Inasmuch as discount information is required to be posted both for the gas and electric industries under other provisions of our regulations, we delete proposed section 358.4(b), which had set forth proposed requirements for the posting of discount information. Also, if a transmission owner is a member of an RTO or ISO and has not participated in the granting of a discount by the RTO or ISO, it would not be subject to the obligation to post such discounts.

2. Other Posting Requirements

C. Commission Determination

i. <u>Contemporaneous Disclosure</u>

235. Section 358.7(a)(1) requires that if non-public transmission function information is disclosed to a marketing function employee, the transmission provider must post the information on its website. Some commenters object to the posting requirement where non-public information is disclosed by the transmission provider, arguing that such posting will provide an advantage to a competitor. We disagree. Such posting, by making the information public, will place the competitor and the transmission provider's affiliated marketer on an even footing. Therefore, this provision will be retained.

236. Western Utilities and INGAA raise concerns over the posting provision in instances where a marketing affiliate receives non-public transmission function information from a third party. Since we are eliminating that particular prohibition of the No Conduit Rule, no change to the posting provision is necessary. However, we note that if a transmission provider uses anyone as a conduit for improper disclosures, such an event would be considered an improper disclosure and should be posted.

237. The Commission proposed in section 358.7(a)(2) that only a notice be posted in the event non-public transmission customer information is improperly disclosed, rather than requiring posting of the disclosure itself, to prevent a further breach of confidentiality. We extend this distinction between posting of a

notice and posting the disclosure itself to include CEII,[7] as well as any other information that the Commission by law has determined is to be subject to limited dissemination. However, we decline to extend it to cover information where disclosure may be deemed to breach some other public policy goal, as requested by National Grid. This standard is too imprecise to have practical application. If a transmission provider is concerned about disclosure in any given instance, it may seek guidance from the Commission.

238. We decline to adopt ATC's proposal that with respect to non-public transmission information that was improperly disclosed, the transmission provider must post it immediately "upon discovery of disclosure," rather than upon the actual disclosure. The provision by its terms imposes the posting requirement on a transmission provider that wrongfully discloses such information, and it would be anomalous to assume the transmission provider was not aware of its own actions. A corporation can only act through its agents and employees, and those actions are taken on behalf of the corporation. Therefore, knowledge of the disclosure is imputed to the transmission provider, which is responsible both for the disclosure and for the posting.

ii. Specific Transaction Information

239. Section 358.7(b) provides an exemption to the disclosure requirement for requests for transmission service made by a marketing function employee. The Commission agrees that the language should be modified to clarify that transmission function employees may discuss with marketing function employees the latter's specific request for transmission service (but not non-public matters beyond the specific request, such as outages or other system conditions). We therefore add the following sentence: "A transmission provider's transmission function employee may discuss with its marketing function employee a specific request for transmission service submitted by the marketing function employee."

iii. Voluntary Consent Provision

240. The Commission declines to move the provision regarding the posting of voluntary employee consents in section 358.7(c) to the Independent Functioning Rule, as requested by SCE. The provision in question relates to posting, and is

[7] This limitation does not affect our determinations made elsewhere regarding the need to disclose information that may contain CEII, or the appropriate methods for entities to access such CEII, nor our adoption of mandatory reliability standards for CEII. See, e.g., Order 890 at P 403-404; Mandatory Reliability Standards for Critical Infrastructure Protection, Order No. 706, 73 Fed. Reg. 7368 (Feb. 7, 2008), 122 FERC ¶ 61,040, reh'g denied and clarification granted, Order No. 706-A ,123 FERC ¶ 61,174 (2008).

therefore appropriately included in the Transparency Rule. We also decline to include a specific exclusion to the customer consent provision for contracts involving generator output, as requested by MidAmerican. The posting requirements are general in application, and ought not to be so detailed as to cover every special circumstance that may apply to only one or a limited number of transmission providers. To do so would make the regulations unwieldy and subject to constant change. Therefore, we decline to include an exclusion covering a customer's consent for contracts involving generator output.

241. Furthermore, we decline to distinguish between affiliated and non-affiliated customers in connection with the voluntary consent provision. The intent of the provision is to permit any customer to disclose customer information to marketing function employees of the transmission provider, should it desire to do so. Of course, an affiliated customer will already be aware of information pertaining to its own marketing affiliate, but there conceivably could be other marketing affiliates of the same transmission provider as to which the customer may wish to give its consent for disclosure.

242. The Commission agrees that the voluntary consent provision refers to non-public customer information (including a customer's transmission request and accompanying information), and adds this phrase to section 358.7(c).

iv. Identification of Affiliate Information

243. Section 358.7(e)(1) provides that a transmission provider post the names and addresses of all its affiliates that employ or retain marketing function employees. The Commission declines to revert to a requirement to post an organizational chart of all affiliates of a transmission provider, and further declines to extend this to a color-coded chart. With the elimination from the Standards of the concept of energy affiliates, it is only necessary to be concerned with the marketing affiliates of a transmission provider. Therefore, an entire organizational chart is unnecessary, and an undue burden on transmission providers.

244. With respect to INGAA's request that information need not be posted about affiliates that do not, for instance, hold or control capacity on its affiliated pipeline, the Commission notes that the proposed provision applies to affiliates "that employ or retain marketing function employees." If an activity falls within one of the exclusions to the definition of marketing functions set forth in proposed section 358.3(c), its employees will not by definition be marketing function employees, and the posting rule would not apply. If, however, the activities do not fall within any of the exclusions to the definition, and the affiliate employs or retains marketing function employees, the posting provision would apply.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
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245. We agree with MidAmerican and ATC that the posting requirements in section 358.7(e)(2) regarding shared facilities need not include facilities where transmission function employees and marketing function employees do not both transact their job-related activities, and modify the regulatory text accordingly. We further clarify that the phrase "employee-staffed facilities" is meant to exclude facilities where individuals do not typically transact business, such as substations.

v. Identification of Employee Information

246. The Commission agrees with EEI that the proposed provision in section 358.7(f)(1) covering the posting of job titles and names of transmission function employees should conform more closely to the employee functional approach. Furthermore, in accordance with the clarification made in this Final Rule, such jobs as maintenance and field positions are not considered transmission functions, unless the employees also engage in the day-to-day operation of the transmission system. Therefore, we will modify the wording of this provision to refer only to "transmission function employees," and delete the reference to clerical, maintenance and field positions.

vi. Timing and General Requirements of Postings

247. Section 358.7(g)(1) requires updated posting on a transmission provider's OASIS or Internet website. The Commission agrees with SCE that transmission owners who are members of RTOs or ISOs might not have their own OASIS. Furthermore, some interested entities or individuals might not have access to a transmission provider's OASIS. We therefore modify the venue for posting to require that the posting of information required under the Standards for both public utilities and interstate pipelines is to be made on the transmission provider's website, where it will be accessible to all interested entities. The various sections within the Transparency Rule are amended to conform to this change.

248. Section 358.7(g)(2) provides suspension of postings in the case of emergencies. The Commission does not deem it necessary to list every conceivable natural disaster in this provision, but will add "earthquakes" to the list, as requested by SCE. Chandeleur requests clarification as to the method of implementation of this provision. In the event the transmission provider needs suspension of postings beyond one month, it should publicly file with the Commission for a further period of suspension, in accordance with the provisions of part 385 of the Commission's regulations.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
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vii. Other

249. Chandeleur suggests the Commission provide an anticipatory waiver of any changes to NAESB standards which may be made relating to the format and content of posting requirements, should they be inconsistent with the Standards here adopted. The NAESB standards currently adopted by the Commission are set forth in 18 CFR sections 38.2 and 284.12 (2008), and relate to matters other than the Standards of Conduct. The provisions applicable to electric utilities in section 38.2 include the Business Practices for Open Access Same-Time Information Systems (OASIS), which relate to requests for transmission service. The provisions applicable to pipelines in section 284.12 include information which is to be posted on the pipeline's Internet website, covering such matters as the name of shippers taking service, the rate charged, the duration of the contract, receipt and delivery points, quantity, whether the shipper is an affiliate of the pipeline, and the like. These postings generally differ from the postings required under the Standards of Conduct. As discussed above, to the extent any of the information required under the Standards of Conduct is also required under other regulations or orders, duplicative postings are not required. Therefore, no anticipatory waiver of the type requested by Chandeleur is needed or appropriate.

b. Description of Recommendation:

Paragraph 247 of FERC Order 717 modified the venue for posting the required standards of conduct information. Because public (electric) utilities are no longer required to post the information on their OASIS, it is appropriate to remove the requirement from the NAESB WEQ Business Practice Standards. However, the template structures for ***personnel***, ***discretion*** and ***stdconduct*** have been retained in the NAESB Business Practice Standards and may, at the option of the Transmission Provider, be implemented.

c. Business Purpose:

Implementation of FERC Order 717.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):
Supporting Documentation:

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

- WEQ Business Practices Subcommittee Meeting Minutes:
  - February 9, 2009
  - March 9, 2009
  - March 23, 2009 (unavailable – DC)
- Motions Document

FORMAL COMMENTS

Quadrant:	Wholesale Electric Quadrant
Recommendation:	2009 AP Item 3.d – Develop business practice standards in support of FERC Order No. 717
Submitted By:	Standards Review Subcommittee
Date:	April 23, 2009

Under the Standards Review Subcommittee (SRS) Scope of Work, which was approved by the SRS on March 6, 2008, the SRS agreed to review recommendations and if subcommittee deemed appropriate, they would submit advisory comment to the Executive Committee for consideration. As stated in the Scope of Work these comments are "not intended to change the scope of the Business Practices or recommendation, but to provide consistency and uniformity across all WEQ Business Practices."

The SRS is requesting the Executive Committee consider the following advisory comment in their review of this recommendation.

Section 02-4.3.1 Template Summary

In the column marked Template(s), the name of the template should not be capitalized. "Personnel" should be "personnel". This will be consistent with the other template names in the column. Also, the Section number reference is incorrect. It should be 002-4.3.1.

Duke Energy fully supports the Business Practice as drafted.

Duke opposes the suggestion by Entergy that some sort of language addressing Order No. 890-A at paragraph 585 is necessary. Paragraph 585 reads in its entirety:

> We also agree with MidAmerican that a transmission provider's waiver of a reassessment for conditional firm or planning redispatch service does not constitute a waiver of all reassessments for the duration of the service, unless explicitly agreed to by the transmission provider. We reiterate, however, that only one reassessment may be performed in each two-year period of service. We also affirm that any waiver must be granted for similarly situated service, which would include conditional firm or planning redispatch service that is limited because of the same constraints or general system limitations. *Such a waiver would be an act of discretion that must be posted on OASIS*. Waiver of the reassessment presents an opportunity for discrimination among classes of customers on the part of the transmission provider and posting will provide eligible customers with an indicator of how often conditions or redispatch requirements have been reassessed. Transmission providers are directed to develop uniform OASIS posting standards, in coordination with NAESB, for transmission providers to post information regarding waivers of the biennial reassessment for planning redispatch and conditional firm service.

(Emphasis added.) This paragraph must be read in context. It was issued when Order No. 2004 required that *all* acts of discretion had to posted in a log. Moreover, the Standards of Conduct NOPR that was pending when Order No. 890-A was drafted proposed that: "Electric Transmission Providers must maintain a written log, available for Commission audit, detailing the circumstances and manner in which they exercised their discretion under any terms of the tariff. The information contained in this log is to be posted on the OASIS or Internet Web site within 24 hours of when a Transmission Provider exercises its discretion under any terms of the tariff." Thus, the direction in Order No. 890-A for NAESB to develop posting standards, related to the facts that: 1) discretion logs were already required; 2) they were expected to be required under the new Standards of Conduct; and 3) NAESB had already adopted standards for posting acts of discretion. It was nearly 10 months later that Order No. 717 eliminated the discretion log altogether and replaced it with an affiliate waiver log. Had Order No. 717 been in effect when Order No. 890-A was issued, the Commission could never have concluded that a "waiver was an act of discretion that must be posted on OASIS." Order No. 717: 1) narrowed the Commission's interest to OATT waivers; 2) narrowed the interest in waivers to only waivers to affiliates; and 3) indicated that an internet website was the appropriately place for posting Standards of Conduct material. In the context of the changes wrought by Order No. 717, this paragraph of Order No. 890-A is now inconsistent with the current FERC policy. Duke believes that the orders can be read consistently and harmoniously, by posting waivers of the reassessment provided to affiliates on an internet website.

Comments Submitted by JT Wood, Southern Company

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

1. RECOMMENDED ACTION:

_X_ Accept as requested
___ Accept as modified below
___ Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

_X_ Change to Existing Practice
___ Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___ Initiation	___ Initiation
_X_ Modification	_X_ Modification
___ Interpretation	___ Interpretation
___ Withdrawal	___ Withdrawal
___ Principle	___ Principle
___ Definition	___ Definition
_X_ Business Practice Standard	_X_ Business Practice Standard
___ Document	___ Document
___ Data Element	___ Data Element
___ Code Value	___ Code Value
___ X12 Implementation Guide	___ X12 Implementation Guide
___ Business Process Documentation	___ Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The Commission issued Order 717 which changed the posting requirements associated with the Standards of Conduct.

RECOMMENDED STANDARDS:

The following modifications to WEQ-001, WEQ-002 and WEQ-003 are recommended to implement the Commission's findings in Order 717.

Comments Submitted by JT Wood, Southern Company

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

Modifications to WEQ-001
(Changed Requirements)

001-13.1 **OASIS HOME PAGE**

The Transmission Provider shall establish the following HTML hyperlinks to standardized information postings of a general (i.e., non-template) nature located on the Transmission Provider's OASIS Home Page at their registered OASIS URL address. These links must appear as named and in the following order:

NAESB Home Page

~~***Standards of Conduct***~~

Performance Metrics

Business Practices, Waivers, and Exemptions

ATC Information

Nothing in this standard shall preclude the Transmission Provider from establishing additional hyperlinks or making additional content available on their OASIS Home Page.

~~In the case where a Transmission Provide has several Transmission Owners, the TO's are subject to the Standards of Conduct links and information, In that case, the Transmission Provider will have links to the individual Transmission Owner's websites. The Transmission Owners websites will follow section WEQ-001-13.1.2.~~

001-13.1.2 ~~STANDARDS OF CONDUCT LINK~~ Reserved

~~The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g*, Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g*, Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the "***Standards of Conduct***" link displayed on the Transmission Provider's OASIS Home Page.~~

~~***Emergency Circumstances Deviations*** (§358.4(a)(2))~~

Comments Submitted by JT Wood, Southern Company

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

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~~***Marketing and Energy Affiliate List*** (§358.4(b)(1))~~

~~***Shared Facilities*** (§358.4(b)(2))~~

~~***Organizational Charts and Job Descriptions*** (§358.4(b)(3)(i))~~

~~***Common Employees*** (§358.4(b)(3)(iii))~~

~~***Potential Merger Partners*** (§358.4(b)(3)(v))~~

~~***Transfers***[1] (§358.4(c))~~

~~***Information Disclosure***[2] (§358.5(b) (3))~~

~~***Voluntary Consent to Share Non-Affiliated Customer Information*** (§358.5(b)(4))~~

~~***Discretionary Actions under Tariff***[3] (§358.5(c)(4))~~

~~***Discounts***[4] (§358.5(d))~~

~~***Chief Compliance Officer*** (§358.4(e)(6))~~

~~***Written Procedures for Implementation*** (§358.4 (e)(3))~~

~~These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to Standards of Conduct. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to Standard WEQ-002-3.1~~

001-21.3.1.2.2 ~~Any such waiver of the Biennial Reassessment shall be posted on OASIS as a discretionary action under the Tariff in accordance with Standards WEQ-002 and WEQ-013 such that this information may be queried and viewed using the ***discretion*** template.~~ Reserved

001-C.4 ~~Requirements related to posting of information under the Standards of Conduct Link documented in Standard WEQ-002 Business Practices for Open Access~~

[1] ~~According to Standard WEQ-002-4.3.10.4 a template is required for this item.~~
[2] ~~According to Standard WEQ-002-4.3.10.6 a template is required for this item.~~
[3] ~~According to Standard WEQ-002-4.3.10.5 a template is required for this item.~~
[4] ~~According to Standard WEQ-002-4.3.2.1 a template is required for this item.~~

Comments Submitted by JT Wood, Southern Company

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
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~~Same-Time Information Systems (OASIS) Standards and Communications Protocols do not apply to RTOs and ISOs.~~ Reserved

Comments Submitted by JT Wood, Southern Company

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

Modifications to WEQ-002
(Changed Requirements)

002-3.4 PROVIDER UPDATING REQUIREMENTS

b. **General Postings**

(i) INFO.HTM

(ii) ~~Standards of Conduct~~ Reserved

~~The Transmission Provider shall establish a link entitled "Standards of Conduct," located on the OASIS home page at the Transmission Provider's registered URL address.~~

02-4.3.1 **Template Summary**

Process Area	Process Name	Template(s)
4.3.10 Informal Messages	Post Want Ads (Input)	messagepost
	Query/Response Want Ads	message
	Delete Want Ad (Input)	messagedelete
	Personnel Transfers	Personnel (optional template to be implemented at Transmission Provider's discretion)
	Discretion	discretion (optional template to be implemented at Transmission Provider's discretion)
	Standards of Conduct	stdconduct (optional template to be implemented at Transmission Provider's

Comments Submitted by JT Wood, Southern Company

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
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Process Area	Process Name	Template(s)
		discretion)

002-4.3.10.4 Personnel Transfers (personnel)

~~The Personnel Transfers (***personnel)*** Template is used to indicate when personnel are transferred between the merchant function and the Transmission Provider function as required by Standards of Conduct WEQ-009 or applicable regulations.~~

The Personnel Transfers (***personnel)*** Template is used to post a notice of a transfer of a transmission function employee to a position as a marketing function employee, or a transfer of a marketing function employee to a position as a transmission function employee, as described in 18 CFR Part 358. The ***personnel*** template is an optional template to be implemented at the Transmission Provider's discretion.

002-4.3.10.5 Discretion (discretion)

Deleted: Reserved

~~The Discretion (***discretion)*** Template is used to describe the circumstances when discretion was exercised in applying terms of the tariff, as described in the Standards of Conduct WEQ-009 or applicable regulations.~~

The Discretion (***discretion)*** Template is used to post a notice of a waiver of a tariff provision that a Transmission Provider grants in favor of an affiliate, as described in 18 CFR Part 358. The ***discretion*** template is an optional template to be implemented at the Transmission Provider's discretion.

002-4.3.10.6 Standards of Conduct (stdconduct)

The Standards of Conduct (***stdconduct)*** Template indicates when information is disclosed in a manner contrary to the standards of conduct, as described in 18 CFR Part 358.~~the Standards of Conduct WEQ-009 or applicable regulations~~. The ***stdconduct*** template is an optional template to be implemented at the Transmission Provider's discretion.

Comments Submitted by JT Wood, Southern Company

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

002-4.3.11 **Audit Log**

The OASIS audit log report facility shall be implemented by the definition of the following Templates:

transofferingaudit	- audit counterpart to ***transoffering***
ancofferingaudit	- audit counterpart to ***ancoffering***
scheduledetailaudit	- audit counterpart to ***scheduledetail***
securityaudit	- audit counterpart to ***security***
systemdataaudit	- audit counterpart to ***systemdata***
transstatusaudit	- audit counterpart to ***transstatus***
ancstatusaudit	- audit counterpart to ***ancstatus***
personnelaudit*	- audit counterpart to ***personnel***
discretionaudit*	- audit counterpart to ***discretion***
stdconductaudit*	- audit counterpart to ***stdconduct***

Each of these audit Templates is an extension to the OASIS Template definitions of their non-audit counterparts. The requirements for implementation of the audit Templates are defined in the following sections.

*A Transmission Provider is only required to implement the audit log templates ***personnelaudit***, ***discretionaudit***, and ***stdconductaudit*** if and when the Transmission Provider also uses the ***personnel***, ***discretion***, ***stdconduct*** templates for posting Standards of Conduct information required under 18 CFR Part 358.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: BPS Subcommittee
Request No.: 2009 AP 3(d)
Request Title: Order 717, Standards of Conduct

Modifications to WEQ-003
(Changed Requirements)

003-0 OASIS DATA DICTIONARY, Version 1.5				
Data Dictionary Element Name	**Alias**	**Field Format : minimum characters {type of ASCII} maximum characters**	**Restricted Values**	**Definition of Data Element**
DISCRETION_DESCRIPTION	DISCDESC	0{ALPHANUMERIC}1000	Free form text	A detailed description of the waiver ~~discretion~~ being posted ~~reported~~. The ***discretion*** template and the related DISCRETION_DESCRIPTION data element are an optional implementation at the Transmission Provider's discretion.
EMPLOYEE_NAME	EMPNAME	1{ALPHANUMERIC}25	Free form text	Name of person who is transferring from one position to another. The ***personnel*** template and the related EMPLOYEE_NAME data element are an optional implementation at the Transmission Provider's discretion.
FORMER_COMPANY	FORMCO	1{ALPHANUMERIC}25	Free form text	Former company of the person who is transferring. The ***personnel*** template and the related FORMER_COMPANY data element are an optional implementation at the Transmission Provider's discretion.
FORMER_DEPARTMENT	FORMDEPT	1{ALPHANUMERIC}52	Free form text	Former department of the person who is transferring. The ***personnel*** template and the related FORMER_DEPARTMENT data element are an optional implementation at the Transmission Provider's discretion.
FORMER_POSITION	FORMPOS	1{ALPHANUMERIC}25	Free form text	Former position held by the person who is transferring. The ***personnel*** template and the related FORMER_POSITION data element are an optional implementation at the Transmission Provider's discretion.

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003-0 OASIS DATA DICTIONARY, Version 1.5				
Data Dictionary Element Name	**Alias**	**Field Format : minimum characters {type of ASCII} maximum characters**	**Restricted Values**	**Definition of Data Element**
NEW_COMPANY	NEWCO	1{ALPHANUMERIC}25	Free form text	New company of the person who is transferring. The ***personnel*** template and the related NEW_COMPANY data element are an optional implementation at the Transmission Provider's discretion.
NEW_DEPARTMENT	NEWDEPT	1{ALPHANUMERIC}52	Free form text	New department of the person who is transferring. The ***personnel*** template and the related NEW_DEPARTMENT data element are an optional implementation at the Transmission Provider's discretion.
NEW_POSITION	NEWPOS	1{ALPHANUMERIC}25	Free form text	New position held by the person who is transferring. The ***personnel*** template and the related NEW_POSITION data element are an optional implementation at the Transmission Provider's discretion.
RESPONSIBLE_PARTY _NAME	PARTNAME	1{ALPHANUMERIC}25	Free form text	The name of the person responsible for granting the waiver ~~discretion~~. The ***discretion*** template and the related RESPONSIBLE_PARTY_NAME data element are an optional implementation at the Transmission Provider's discretion.
STANDARDS_OF_CONDUCT _ISSUES	STDISSUE	0{ALPHANUMERIC}800	Free form text	Information disclosures ~~Issues~~ that were in violation of the FERC Standards of Conduct described in 18 CFR Part 358. This text may include a reference pointer to a more detailed description. The ***stdconduct*** template and the related STANDARDS_OF_CONDUCT_ISSUES data element are an optional implementation at the Transmission Provider's discretion.

Comments Submitted by JT Wood, Southern Company

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

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4. SUPPORTING DOCUMENTATION

a. Description of Request:

WEQ 2009 AP

3 Develop business practices standards to improve the current operation of the wholesale electric market and develop and maintain business practice and communication standards for OASIS and Electronic Scheduling

d) Develop business practice standards in support of FERC Order No. 717 2009 BPS

FERC Orders

In FERC Order No. 717 under Docket No. RM07-1-000 issued October 16, 2008, the Commission made the following conclusions regarding posting requirements associated with the Standards of Conduct [note that while paragraph numbers correlate with FERC Order No. 717, the footnote numbers do not]:

III. Discussion

E. Transparency Rule

1. Waivers and Exercises of Discretion

C. Commission Determination

213. Proposed section 358.4, which generally deals with non-discrimination requirements, also contains the posting requirements for notices of waivers, notices of exercises of discretion, and discounts. Inasmuch as these posting aspects of the proposed section relate to the Transparency Rule, we move them to section 358.7, which includes the other posting requirements under the Standards. Further, in response to NGSA's request, we clarify that section 358.4 as a whole, as well as the posting requirements moved to section 358.7, apply to all transmission providers, in accordance with the limitations set forth in section 358.1.

214. Commenters had no objections to the general requirements of section 358.4, other than regarding waivers, exercises of discretion and discounts. The Commission is persuaded by the arguments of many commenters that a blanket requirement to post all waivers and exercises of discretion goes beyond what is needed to alert customers and others to possible acts of undue discrimination or preferences in favor of an affiliate. Furthermore, such posting is in some cases redundant to the posting requirements set forth elsewhere in our regulations. Therefore, although the Commission confirms the substantive non-discrimination

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requirements of section 358.4, we modify the posting requirements in a number of ways.

215. As a preliminary matter, the Commission clarifies that for these purposes, a waiver is considered to be a determination to do or not do something that is specifically required to be done or not done by the transmission provider's tariff. An act of discretion, on the other hand, is an action that is within the scope of the tariff provision in question, and which typically involves an exercise of judgment on the part of the transmission provider. The Commission has in some cases approved tariffs for interstate pipelines that grant the pipeline the right to waive compliance with provisions of its tariff, typically for a given entity for a limited term.[5] We will continue to require transmission providers to record in a log such waivers, if granted in favor of an affiliate, and to post the log on the transmission provider's Internet website (however, if a specific waiver is approved by Commission order, such waiver need not be posted as it will already be public). We also add a definition of waiver to the regulatory text, to read: "Waiver means the determination by a transmission provider, if authorized by its tariff, to waive any provisions of its tariff for a given entity." See section 358.3(m). Limiting the recording of waivers to those in favor of an affiliate will reduce the administrative burden on the pipeline, while capturing any instances of potential undue discrimination.

216. The Commission further determines that transmission providers need not post exercises of discretion that are within the scope of a tariff provision, unless in any given instance such posting is required under any other of our regulations. Such acts are already permitted by the tariff, and therefore fall within the scope of matters which the Commission has approved. Furthermore, a transmission provider, in particular a pipeline, makes many of these judgment calls every day on an ongoing basis; recording all these matters would place a substantial administrative burden on it.

217. The Commission declines to modify the proposed five-year retention requirement for recordation of the acts of waiver, as the five-year period will better enable Commission staff to monitor compliance.[6] Records may be examined only periodically, as when an audit is performed, and therefore earlier deletion could impede the necessary review. However, we observe that the volume of material to be retained should be substantially reduced, in light of the Final Rule's more circumscribed reporting requirements.

[5] See, e.g., CenterPoint Energy Gas Transmission Company FERC Gas Tariff, Sixth Revised Volume No. 1, § 15.1.

[6] See also our discussion above concerning the five-year retention period for certain information exchanges under section 358.7(h).

Comments Submitted by JT Wood, Southern Company

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218. The Commission further clarifies that where the information called for under the posting requirements of the Standards is duplicative of information required to be posted by transmission providers under other provisions of our regulations or orders, such as the posting requirements of 18 CFR part 284 and 18 CFR part 37, only a single posting is required, and the transmission provider is to follow the posting requirements, inclusive of substance, venue, and timing, of the other regulations or orders. We believe the posting requirements contained in such regulations or orders are sufficient to fulfill the transparency goals of the Standards of Conduct. Inasmuch as discount information is required to be posted both for the gas and electric industries under other provisions of our regulations, we delete proposed section 358.4(b), which had set forth proposed requirements for the posting of discount information. Also, if a transmission owner is a member of an RTO or ISO and has not participated in the granting of a discount by the RTO or ISO, it would not be subject to the obligation to post such discounts.

2. Other Posting Requirements

C. Commission Determination

i. <u>Contemporaneous Disclosure</u>

235. Section 358.7(a)(1) requires that if non-public transmission function information is disclosed to a marketing function employee, the transmission provider must post the information on its website. Some commenters object to the posting requirement where non-public information is disclosed by the transmission provider, arguing that such posting will provide an advantage to a competitor. We disagree. Such posting, by making the information public, will place the competitor and the transmission provider's affiliated marketer on an even footing. Therefore, this provision will be retained.

236. Western Utilities and INGAA raise concerns over the posting provision in instances where a marketing affiliate receives non-public transmission function information from a third party. Since we are eliminating that particular prohibition of the No Conduit Rule, no change to the posting provision is necessary. However, we note that if a transmission provider uses anyone as a conduit for improper disclosures, such an event would be considered an improper disclosure and should be posted.

237. The Commission proposed in section 358.7(a)(2) that only a notice be posted in the event non-public transmission customer information is improperly disclosed, rather than requiring posting of the disclosure itself, to prevent a further breach of confidentiality. We extend this distinction between posting of a

notice and posting the disclosure itself to include CEII,[7] as well as any other information that the Commission by law has determined is to be subject to limited dissemination. However, we decline to extend it to cover information where disclosure may be deemed to breach some other public policy goal, as requested by National Grid. This standard is too imprecise to have practical application. If a transmission provider is concerned about disclosure in any given instance, it may seek guidance from the Commission.

238. We decline to adopt ATC's proposal that with respect to non-public transmission information that was improperly disclosed, the transmission provider must post it immediately "upon discovery of disclosure," rather than upon the actual disclosure. The provision by its terms imposes the posting requirement on a transmission provider that wrongfully discloses such information, and it would be anomalous to assume the transmission provider was not aware of its own actions. A corporation can only act through its agents and employees, and those actions are taken on behalf of the corporation. Therefore, knowledge of the disclosure is imputed to the transmission provider, which is responsible both for the disclosure and for the posting.

ii. Specific Transaction Information

239. Section 358.7(b) provides an exemption to the disclosure requirement for requests for transmission service made by a marketing function employee. The Commission agrees that the language should be modified to clarify that transmission function employees may discuss with marketing function employees the latter's specific request for transmission service (but not non-public matters beyond the specific request, such as outages or other system conditions). We therefore add the following sentence: "A transmission provider's transmission function employee may discuss with its marketing function employee a specific request for transmission service submitted by the marketing function employee."

iii. Voluntary Consent Provision

240. The Commission declines to move the provision regarding the posting of voluntary employee consents in section 358.7(c) to the Independent Functioning Rule, as requested by SCE. The provision in question relates to posting, and is

[7] This limitation does not affect our determinations made elsewhere regarding the need to disclose information that may contain CEII, or the appropriate methods for entities to access such CEII, nor our adoption of mandatory reliability standards for CEII. See, e.g., Order 890 at P 403-404; Mandatory Reliability Standards for Critical Infrastructure Protection, Order No. 706, 73 Fed. Reg. 7368 (Feb. 7, 2008), 122 FERC ¶ 61,040, reh'g denied and clarification granted, Order No. 706-A ,123 FERC ¶ 61,174 (2008).

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therefore appropriately included in the Transparency Rule. We also decline to include a specific exclusion to the customer consent provision for contracts involving generator output, as requested by MidAmerican. The posting requirements are general in application, and ought not to be so detailed as to cover every special circumstance that may apply to only one or a limited number of transmission providers. To do so would make the regulations unwieldy and subject to constant change. Therefore, we decline to include an exclusion covering a customer's consent for contracts involving generator output.

241. Furthermore, we decline to distinguish between affiliated and non-affiliated customers in connection with the voluntary consent provision. The intent of the provision is to permit any customer to disclose customer information to marketing function employees of the transmission provider, should it desire to do so. Of course, an affiliated customer will already be aware of information pertaining to its own marketing affiliate, but there conceivably could be other marketing affiliates of the same transmission provider as to which the customer may wish to give its consent for disclosure.

242. The Commission agrees that the voluntary consent provision refers to non-public customer information (including a customer's transmission request and accompanying information), and adds this phrase to section 358.7(c).

iv. Identification of Affiliate Information

243. Section 358.7(e)(1) provides that a transmission provider post the names and addresses of all its affiliates that employ or retain marketing function employees. The Commission declines to revert to a requirement to post an organizational chart of all affiliates of a transmission provider, and further declines to extend this to a color-coded chart. With the elimination from the Standards of the concept of energy affiliates, it is only necessary to be concerned with the marketing affiliates of a transmission provider. Therefore, an entire organizational chart is unnecessary, and an undue burden on transmission providers.

244. With respect to INGAA's request that information need not be posted about affiliates that do not, for instance, hold or control capacity on its affiliated pipeline, the Commission notes that the proposed provision applies to affiliates "that employ or retain marketing function employees." If an activity falls within one of the exclusions to the definition of marketing functions set forth in proposed section 358.3(c), its employees will not by definition be marketing function employees, and the posting rule would not apply. If, however, the activities do not fall within any of the exclusions to the definition, and the affiliate employs or retains marketing function employees, the posting provision would apply.

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245. We agree with MidAmerican and ATC that the posting requirements in section 358.7(e)(2) regarding shared facilities need not include facilities where transmission function employees and marketing function employees do not both transact their job-related activities, and modify the regulatory text accordingly. We further clarify that the phrase "employee-staffed facilities" is meant to exclude facilities where individuals do not typically transact business, such as substations.

v. Identification of Employee Information

246. The Commission agrees with EEI that the proposed provision in section 358.7(f)(1) covering the posting of job titles and names of transmission function employees should conform more closely to the employee functional approach. Furthermore, in accordance with the clarification made in this Final Rule, such jobs as maintenance and field positions are not considered transmission functions, unless the employees also engage in the day-to-day operation of the transmission system. Therefore, we will modify the wording of this provision to refer only to "transmission function employees," and delete the reference to clerical, maintenance and field positions.

vi. Timing and General Requirements of Postings

247. Section 358.7(g)(1) requires updated posting on a transmission provider's OASIS or Internet website. The Commission agrees with SCE that transmission owners who are members of RTOs or ISOs might not have their own OASIS. Furthermore, some interested entities or individuals might not have access to a transmission provider's OASIS. We therefore modify the venue for posting to require that the posting of information required under the Standards for both public utilities and interstate pipelines is to be made on the transmission provider's website, where it will be accessible to all interested entities. The various sections within the Transparency Rule are amended to conform to this change.

248. Section 358.7(g)(2) provides suspension of postings in the case of emergencies. The Commission does not deem it necessary to list every conceivable natural disaster in this provision, but will add "earthquakes" to the list, as requested by SCE. Chandeleur requests clarification as to the method of implementation of this provision. In the event the transmission provider needs suspension of postings beyond one month, it should publicly file with the Commission for a further period of suspension, in accordance with the provisions of part 385 of the Commission's regulations.

Comments Submitted by JT Wood, Southern Company

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vii. Other

249. Chandeleur suggests the Commission provide an anticipatory waiver of any changes to NAESB standards which may be made relating to the format and content of posting requirements, should they be inconsistent with the Standards here adopted. The NAESB standards currently adopted by the Commission are set forth in 18 CFR sections 38.2 and 284.12 (2008), and relate to matters other than the Standards of Conduct. The provisions applicable to electric utilities in section 38.2 include the Business Practices for Open Access Same-Time Information Systems (OASIS), which relate to requests for transmission service. The provisions applicable to pipelines in section 284.12 include information which is to be posted on the pipeline's Internet website, covering such matters as the name of shippers taking service, the rate charged, the duration of the contract, receipt and delivery points, quantity, whether the shipper is an affiliate of the pipeline, and the like. These postings generally differ from the postings required under the Standards of Conduct. As discussed above, to the extent any of the information required under the Standards of Conduct is also required under other regulations or orders, duplicative postings are not required. Therefore, no anticipatory waiver of the type requested by Chandeleur is needed or appropriate.

b. Description of Recommendation:

Paragraph 247 of FERC Order 717 modified the venue for posting the required standards of conduct information. Because public (electric) utilities are no longer required to post the information on their OASIS, it is appropriate to remove the requirement from the NAESB WEQ Business Practice Standards. However, the template structures for ***personnel***, ***discretion*** and ***stdconduct*** have been retained in the NAESB Business Practice Standards and may, at the option of the Transmission Provider, be implemented.

c. Business Purpose:

Implementation of FERC Order 717.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):
Supporting Documentation:

Comments Submitted by JT Wood, Southern Company

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**BPS Subcommittee**
Request No.:	**2009 AP 3(d)**
Request Title:	**Order 717, Standards of Conduct**

- WEQ Business Practices Subcommittee Meeting Minutes:
  - February 9, 2009
  - March 9, 2009
  - March 23, 2009 (unavailable – DC)
- Motions Document

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

1. RECOMMENDED ACTION:

_X_ Accept as requested
___ Accept as modified below
___ Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

_X_ Change to Existing Practice
___ Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___ Initiation
_X_ Modification
___ Interpretation
___ Withdrawal

___ Principle
___ Definition
_X_ Business Practice Standard
___ Document
___ Data Element
___ Code Value
___ X12 Implementation Guide
___ Business Process Documentation

Per Recommendation:

___ Initiation
_X_ Modification
___ Interpretation
___ Withdrawal

___ Principle
___ Definition
_X_ Business Practice Standard
___ Document
___ Data Element
___ Code Value
___ X12 Implementation Guide
___ Business Process Documentation

3. RECOMMENDATION

SUMMARY:

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **ESS/ITS Subcommittees**
Request No.: **2009 AP Item 2(a)(ii)(3)**
Request Title: **Rollover Rights on Redirect on a Firm Basis**

The Commission has issued various clarifications on its intended policy regarding the granting of rollover (renewal, evergreen) rights to requests for Redirect on a Firm Basis in Orders 676, 890 and 890-A. The following recommendation is a modification to WEQ-001-9.7 to reflect these clarifications in policy and implement the necessary standards for treatment of rollover rights for requests to Redirect on a Firm Basis.

Please refer to Section 4(a) for information related to the relevant FERC rulings, and Section 4(d) for the rationale behind the specific recommendations presented.

This recommendation addresses the WEQ 2009 Annual Plan Item2(a)(ii)(3): Revisions to Standard 9.7

RECOMMENDED STANDARDS:

Additions and corrections to WEQ-001 Definitions; enumeration to be established by NAESB staff at time of ratification:

001-0.nn

Capacity Eligible for Rollover - The net amount of capacity that is held on a qualifying Firm Point-to-Point Transmission Service reservation eligible for on-going rollover of service after subtracting the capacity held on any confirmed service reservations for renewal of those rollover rights for a subsequent term of service and after subtracting any capacity conveyed as an on-going rollover right to a qualifying confirmed Redirect on a Firm basis.

Footnote 1: Transmission Customer holds a Long-Term Parent Reservation for 100 MW with rollover limited to 90 MW pursuant to conditions identified when the Parent Reservation was negotiated. Transmission Customer has already renewed 25 MW on the Parent Reservation's path and redirected an additional 20 MW with conveyance of rollover rights.

Therefore on the Parent Reservation:
The Capacity Eligible for Rollover = 100-25-20=55

001-0.30 **Unexercised Rollover Rights** – ~~the amount of capacity that is held on a Long- Term Firm Point-to-Point Transmission Service reservation and is eligible for ongoing rollover or renewal of service as established by the Transmission Provider at the time service was granted, less the capacity held on any confirmed service reservations for renewal of those rollover rights for a subsequent term of service, and less any capacity conveyed as an on-going rollover right to a qualifying confirmed Redirect on a Firm Basis..~~
The lower of the Capacity Eligible for Rollover or any restriction or limitation placed on the availability of on-going rollover of service as established by the Transmission Provider in the original service agreement adjusted by the already exercised rollover rights.

Footnote 2: Using the example in the footnote to the definition of Capacity Eligible for Rollover, the Unexercised Rollover Rights on the Parent Reservation shall equal the lower of the Capacity Eligible for Rollover in Footnote 1 (55 MW) or 65 (90 – 25) MW.

Changes to WEQ-001-9

001-9.7 ~~Unless otherwise mutually agreed to by the primary provider and original customer, a request for Redirect on a Firm basis does not impact the TC's long term firm renewal rights (e.g., rollover or evergreen rights) on the original path, nor does it confer any renewal rights on the redirected path.~~A Transmission Customer holding Long-Term Firm Point-to-Point Transmission Service on the Transmission Provider's system that is eligible for continued rollover rights of service may convey those rights to an alternate path or points of receipt and delivery through a request to Redirect on a Firm basis subject to the following requirements:

001-9.7.1 The Transmission Customer shall indicate intent to convey on-going rollover rights held on a Long-Term Firm Point-to-Point Transmission Service reservation through a request to Redirect on a Firm basis submitted on the Transmission Provider's OASIS in accordance with the following:

001-9.7.1.1 The Transmission Service attributes of the Redirect request must correspond to a valid Long-Term Firm Point-to-Point Transmission Service offered by the Transmission Provider; however, the duration (stop/start time) may be as noted in WEQ-001-9.7.4.

001-9.7.1.2 The Redirect request submission time must be prior to the deadline for exercising the Transmission Customer's rollover rights on the Parent Reservation being redirected.

001-9.7.1.3 The Redirect request service stop time must be identical to the stop time (end of term) of the Parent Reservation being redirected.

001-9.7.1.4 All other aspects of the Redirect request must meet all additional requirements for Redirect on a Firm basis as specified in this Standard WEQ-001-9 or established by the Transmission Provider's tariff, including any limitations on Redirects with respect to paths available for redirect, handling of differentials in pricing, etc.

001-9.7.2 Any Redirect request submitted that does not meet all of the requirements of WEQ-001-9.7.1.1 through WEQ-001-9.7.1.4 shall not be considered eligible for conveyance of rollover rights and shall be treated as any other Redirect on a Firm basis as provided for in these standards.

001-9.7.2.1 The Transmission Customer may waive the right to convey rollover rights from the Parent Reservation to the Redirect request by explicitly indicating this intention in the Redirect request submitted on OASIS. If so indicated, the Redirect request shall not be considered eligible for conveyance of rollover rights and shall be treated as any other Redirect on a Firm basis as provided for in these standards and the Capacity Eligible for Rollover on the Parent Reservation remains unchanged.

001-9.7.3 A Redirect request that complies with all of the requirements of WEQ-001-9.7.1.1 through WEQ-001-9.7.1.4, shall be considered eligible for the conveyance of rollover rights from the Parent Reservation.

001-9.7.4 The Transmission Provider shall treat a request for Redirect with rollover rights as any other new request for Long-Term Firm Point-to-Point Transmission Service (e.g., treated as Tier 1 with respect to other services, etc.) with the exception that the duration of the request may be less than 12 months in duration and must reflect a

service increment or multiple thereof for Firm service under the Transmission Provider's approved tariff (e.g., days, weeks).

001-9.7.5 Any request to convey rollover rights on a Redirect that is less than 12 months in duration shall not be allowed to subsequently waive the conveyance of rollover rights; however, the Transmission Customer may withdraw such Redirect request.

001-9.7.6 In the event the total of all requests for rollover rights (Redirect and Renewal) exceeds the Capacity Eligible for Rollover associated with a Parent Reservation, the Transmission Provider shall act on all pending requests to exercise rollover rights (renewal requests) on the Parent Reservation prior to acting on requests to Redirect with rollover rights which were queued after such requests for renewal.

001-9.7.7 In the event the total of all requests for rollover rights (Redirect and Renewal) exceeds the Capacity Eligible for Rollover associated with a Parent Reservation, the Transmission Provider shall act on all pending requests to redirect with rollover rights prior to acting on requests to exercise rollover rights (renewal requests) on the Parent Reservation which were queued after such requests for Redirect.

001-9.7.8 The Transmission Provider shall evaluate the request for Redirect with rollover rights as eligible for on-going rollover rights in the amount of the lower of 1) the MW capacity requested on the Redirect with rollover rights, or 2) the Capacity Eligible for Rollover on the Parent Reservation.

001-9.7.8.1 In the event the evaluation of the request for Redirect with rollover rights is delayed due to the evaluation of Renewal of the Parent Reservation consistent with 001-9.7.5, the Capacity Eligible for Rollover on the Parent Reservation used in the evaluation of such Redirect shall be adjusted to reflect any confirmed Renewal(s).

001-9.7.8.2 The Transmission Customer shall be allowed to submit and have pending multiple requests for Redirect with rollover rights against the same Capacity Eligible for Rollover. The Transmission Provider shall evaluate each such request with the knowledge that only those requests up to the Capacity Eligible for Rollover may ultimately be confirmed.

001-9.7.8.2.1 The Transmission Customer shall not confirm any request for Redirect with rollover rights that exceeds the Capacity Eligible for Rollover. The Transmission Provider shall have the right to block or nullify any such confirmation.

001-9.7.8.2.2 The Transmission Customer should withdraw any request for Redirect with rollover rights that would exceed the current Capacity Eligible for Rollover. The Transmission Provider shall have the right to withdraw their acceptance of any such request that cannot be confirmed.

001-9.7.9 The deadline for submitting notice to exercise any on-going rollover rights that may be conveyed to the Redirect with rollover rights shall be identical to the notice deadline applicable to the Parent Reservation.

001-9.7.9.1 The Transmission Customer shall be allowed to submit a notice to exercise on-going rollover rights (renewal request) on the redirected path while the request for Redirect with rollover rights is still pending final action by the Transmission Provider in order to comply with the requirement to supply such notice prior to the applicable deadline.

001-9.7.10 The Transmission Provider shall specify any limitations or restrictions to the on-going rollover rights applicable on the redirected path as part of the information provided to the Transmission Customer on or before the request for Redirect with rollover rights is accepted.

001-9.7.11 Upon acceptance by the Transmission Provider and confirmation by the Transmission Customer, the conveyance of rollover rights to the Redirect on a Firm basis shall be as follows:

001-9.7.11.1 The Capacity Eligible for Rollover on the redirected path shall be set to the lower of 1) the MW capacity granted on the Redirect with rollover rights, or 2) the Capacity Eligible for Rollover on the Parent Reservation.

001-9.7.11.2 The initial value for the Unexercised Rollover Rights held on the redirected path shall be the lower of 1) the Capacity Eligible for Rollover on the redirected path, or 2) any restriction or limitation to the on-going rollover rights on the redirected path as established by the Transmission Provider.

001-9.7.11.3 The Capacity Eligible for Rollover on the Parent Reservation shall be reduced by the amount of the Capacity Eligible for Rollover conveyed to the redirected path.

001-9.7.11.4 The Unexercised Rollover Rights held on the Parent Reservation shall be adjusted to reflect the lower of 1) the remaining Capacity Eligible for Rollover on the Parent Reservation, or 2) any restriction or limitation to the on-going rollover rights on the parent path as established by the Transmission Provider in the original service agreement.

Changes to WEQ-001-20

001-20.2.4 Upon confirmation of a Long-Term Firm Point-to-Point renewal request by the Transmission Customer exercising their rollover rights, the Transmission Provider shall reduce the ~~rollover capacity (i.e., the Unexercised Rollover Rights) as viewed in the parent reservation's ***rollover*** template by the capacity granted to the renewal reservation.~~ Capacity Eligible for Rollover by the amount granted to the renewal request, and adjust the remaining Unexercised Rollover Rights held on the Parent Reservation accordingly. The remaining Unexercised Rollover Rights shall be posted in accordance with WEQ-002 and WEQ-013.

001-20.3 Once the deadline for the Transmission Customer to submit a renewal request has passed for a Long-Term Firm Point-to-Point reservation that is eligible for rollover rights and there are no outstanding pending renewal requests or any outstanding pending renewal requests on Firm Redirects of the Long-Term Firm Point-to-Point reservation, the Transmission Provider shall set the Capacity Eligible for Rollover and the Unexercised Rollover Rights ~~rollover capacity associated with that reservation (i.e., the Unexercised Rollover Rights)~~to zero.

Changes to WEQ-001-B

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **ESS/ITS Subcommittees**
Request No.: **2009 AP Item 2(a)(ii)(3)**
Request Title: **Rollover Rights on Redirect on a Firm Basis**

001-B APPENDIX B – REDIRECT STANDARDS EXAMPLES

Notes for Examples 1-7: In all cases a Parent Reservation to be Redirected must be Firm Point-to-Point. Unless noted otherwise, example Redirect requests may be on either a firm or non-firm basis. Capacity that is shaded (dotted) shows Parent Capacity Available to Redirect. Capacity in Gray is not available to Redirect. Requests that are cross-hatched are outside the bounds of the Parent Reservation.

Additions to WEQ-001-B to be included after Example 7:

Notes for Examples 8-17: These examples relate specifically to Standards WEQ-001-9.7 for conveyance of rollover rights with a Redirect on a Firm basis. These Redirect requests must be in compliance with all previous examples 1-7 in addition to these additional restrictions.

The transmission service attributes in each of these examples is assumed to be a set of valid attributes defined by the Transmission Provider for Long-Term Firm Point-to-Point Transmission Service, e.g. YEARLY, FIRM, POINT_TO_POINT, FULL_PERIOD, FIXED.

The examples further assume the Transmission Provider, through their Business Practices, has not specified a minimum term for firm redirect requests with conveyance of rollover rights. Consistent with WEQ-001-9.7.4, the Transmission Provider may place such a minimum term requirement on a redirect request with conveyance of rollover rights.

Example 8: Rollover Rights Conveyed to Firm Redirect

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path "A-B" (Parent) with deadline to exercise rollover rights at 60 days prior to end of service.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction

TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F[1]	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

Transmission Customer submits a Redirect on a Firm basis (TSR2) in accordance with WEQ-001-9.7:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	9/1/2008	1/1/2009	100	C-D	100	100	Redirect with conveyance of rollover rights

Redirect on a Firm basis (TSR2) must be for a valid Long-Tem Firm service, e.g., “YEARLY FIRM POINT_TO_POINT”, but, per WEQ-001-9.7.4, must not be invalidated due to duration even though its term of service of only 4 months may not meet a Transmission Provider’s requirement that an original request for this service be submitted for a minimum term of 12 months.

The Transmission Provider evaluates and accepts the Redirect on a Firm basis (TSR2) request with no limitations on on-going rollover rights:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	ACCEPTED	Y/F/P/F/F	9/1/2008	1/1/2009	100	C-D	100	100	Redirect with conveyance of rollover

[1] Yearly, Firm, Point to Point, Full, Fixed. Can be any valid Long-Term Firm service offered by the TP.

												rights

The Transmission Customer confirms the Redirect:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	0	A-B	0	0	Parent reservation
TSR2	TSR1	REDIRECT	No	CONFIRMED	Y/F/P/F/F	9/1/2008	1/1/2009	100	C-D	100	100	Redirect with conveyance of rollover rights

Unexercised Rollover Rights held on the original parent request are conveyed to the confirmed Redirect on a Firm basis per WEQ-001-9.7.10.

Example 9: Rollover Rights Renewed on Original Path are not Eligible to be Conveyed to Firm Redirect

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path "A-B" (Parent) with deadline to exercise rollover rights at 60 days prior to end of service.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

Transmission Customer submits a Renewal (TSR2) of the Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable	Path Name	Capacity Eligible	Unexercised Rollover	Description of

								at End of Term		for Rollover	Rights	Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term

The Transmission Provider accepts the Renewal (TSR2) of the Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	RENEWAL	N/A	ACCEPTED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term

Transmission Customer confirms the Renewal (TSR2) of the Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	0	0	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term

Capacity Eligible for Rollover and the Unexercised Rollover Rights on the Parent Reservation are reduced to 0 per WEQ-001-20.3.

Transmission Customer then submits a request to Redirect on a Firm basis with conveyance of rollover rights from Parent Reservation (TSR1) to the Redirect request (TSR3) for the balance of the term of the Parent Reservation (TSR1):

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	0	0	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term
TSR3	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	9/1/2008	1/1/2009	100	C-D	100	100	Attempt to convey rollover rights on Redirect

The Redirect (TSR3) will not be considered eligible for the conveyance of rollover rights per WEQ-001-9.7.7 and shall be deemed INVALID because Capacity Eligible for Rollover and the Unexercised Rollover Rights on the Parent Reservation (TSR1) have been reduced to 0.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	0	0	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of

												service for new term
TSR3	TSR1	REDIRECT	No	INVALID	Y/F/P/F/F	9/1/2008	1/1/2009	N/A	C-D	N/A	N/A	Attempt to convey rollover rights on Redirect

If the Transmission Customer Redirects the Parent Renewal (TSR2) to path C-D, they must submit a Redirect on a Firm basis in compliance with WEQ-001-9.7 against Renewal (TSR2). If the Transmission Customer requests rollover rights (beyond 1/1/2014) on Path C-D, they should indicate the request for rollover rights when submitting the Redirect of TSR2. The Transmission Customer may alternatively request a Redirect on a Firm basis for the balance of the term of the Parent reservation (TSR1) but without a request for the conveyance of rollover rights. This should be submitted as a Short-Term Redirect.

Example 10: Partial Rollover Rights Conveyed to Partial Firm Redirect Because of Confirmed Partial Capacity Renewal

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path "A-B" (Parent) with deadline to exercise rollover rights at 60 days prior to end of service.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

Transmission Customer submits a Renewal (TSR2) for a portion of the Parent capacity four months prior to end of service:

Assignment	Related	Request	Rollover	Status	Service	Start	Stop	Capacity	Path	Capacity	Unexercised	Description

Reference	Reference	Type	Wavied		Attributes	Time	TIme	Availiable at End of Term	Name	Eligible for Rollover	Rollover Rights	of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term

The Transmission Provider accepts the Renewal (TSR2):

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	RENEWAL	N/A	ACCEPTED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term

Transmission Customer confirms the Renewal (TSR2) for a portion of the Parent capacity:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	60	60	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **ESS/ITS Subcommittees**
Request No.: **2009 AP Item 2(a)(ii)(3)**
Request Title: **Rollover Rights on Redirect on a Firm Basis**

The Capacity Eligible for Rollover and the Unexercised Rollover Rights on the Parent are reduced to 60 per WEQ-001-20.2.4, and the Parent Renewal is for 40 MWs.

Transmission Customer submits a request to Redirect the Parent capacity (60 MW) with conveyance of rollover rights from Parent (TSR1) to Redirect (TSR3) for the balance of the term of Parent (TSR1) three months prior to end of the Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	60	60	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term
TSR3	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	10/1/2008	1/1/2009	60	C-D	60	60	Rollover rights conveyed to Redirect

The Redirect (TSR3) is evaluated and accepted by the Transmission Provider:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	60	60	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term
TSR3	TSR1	REDIRECT	No	ACCEPTED	Y/F/P/F/F	10/1/2008	1/1/2009	60	C-D	60	60	Rollover

												rights conveyed to Redirect

Transmission Customer confirms the Redirect:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	40	A-B	0	0	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term
TSR3	TSR1	REDIRECT	No	CONFIRMED	Y/F/P/F/F	10/1/2008	1/1/2009	60	C-D	60	60	Rollover rights conveyed to Redirect

The Transmission Customer may alternatively request a Redirect on a Firm basis for the balance of the term of the Parent Reservation (TSR1) but without a request for the conveyance of rollover rights. This should be submitted as a Short-Term Redirect.

Example 11: Partial Rollover Rights Conveyed to Partial Firm Redirect Because of Confirmed Partial Capacity Renewal on the Parent

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path "A-B" (Parent) with deadline to exercise rollover rights at 60 days prior to end of service.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

Transmission Customer submits a Renewal (TSR2) for a portion of the Parent capacity four months prior to end of service:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term

The Transmission Provider accepts the Renewal (TSR2):

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	RENEWAL	N/A	ACCEPTED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term

Transmission Customer confirms the Renewal (TSR2)for a portion of the Parent capacity:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	60	60	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term

The Capacity Eligible for Rollover and the Unexercised Rollover Rights on the Parent are reduced to 60 per WEQ-001-20.2.4, and the Parent Renewal is for 40 MWs.

Transmission Customer submits a request to Redirect the Parent capacity (100 MW) with conveyance of rollover rights from Parent (TSR1) to Redirect (TSR3) for the balance of the term of Parent (TSR1) three months prior to end of the Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	60	60	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term
TSR3	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	10/1/2008	1/1/2009	100	C-D	100	100	Rollover rights conveyed to Redirect

The Redirect (TSR3) is evaluated by the Transmission Provider and deemed to be invalid because the request for Redirect (100 MW) with Rollover (also 100 MW) was greater than the Capacity Eligible for Rollover needed for the request:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	60	60	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	40	A-B	40	40	Renewal of service for new term
TSR3	TSR1	REDIRECT	No	INVALID	Y/F/P/F/F	10/1/2008	1/1/2009	N/A	C-D	N/A	N/A	Rollover rights conveyed to Redirect

Example 12: Firm Redirect Queued too Late to be Conveyed Rollover Rights

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path "A-B" (Parent) with deadline to exercise rollover rights at 60 days prior to end of service.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

Transmission Customer submits a Redirect (TSR2) in comformance with WEQ-001-9.7, 75 days prior to the end of Parent (TSR1):

Assignment	Related	Request	Rollover	Status	Service	Start	Stop	Capacity	Path	Capacity	Unexercised	Description

Reference	Reference	Type	Wavied		Attributes	Time	TIme	Availiable at End of Term	Name	Eligible for Rollover	Rollover Rights	of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	11/1/2008	1/1/2009	100	C-D	100	100	Rollover rights conveyed to Redirect

Regardless of when the Transmission Provider completes assessment of the Redirect request, if the Transmission Customer has not submitted a Renewal request on the Parent prior to the 60 day notice deadline, no rollover rights are available once the deadline has passed. The Transmission Customer did not submit a timely Renewal request on the Parent, therefore, the Capacity Eligible for Rollover and the Unexercised Rollover Rights are reduced to zero by the Transmission Provider. The Redirect request should not have been a request for long term service, because no rollover is available. Therefore, the Redirect request is deemed INVALID:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	0	0	Parent reservation
TSR2	TSR1	REDIRECT	No	INVALID	Y/F/P/F/F	11/1/2008	1/1/2009	N/A	C-D	N/A	N/A	Rollover rights conveyed to Redirect

Unexercised Rollover Rights on the Parent are forfeited by failure to submit a timely renewal request per WEQ-001-20.3. All renewal requests, whether for the Parent or related Redirect of Parent's renewal, or renewal of Redirects, must be submitted prior to the notice deadline for renewal requests. (WEQ-001-9.7.8 and 9.7.8.1).

Example 13: Renewal Requests Prior to Confirmation of Firm Redirect – Rollover Rights Conveyed to Firm Redirect

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path "A-B" (Parent) with deadline to exercise rollover rights at 60 days prior to end of service.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

Transmission Customer submits a Redirect (TSR2) in comformance with WEQ-001-9.7 at 75 days prior to the end of Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	11/1/2008	1/1/2009	100	C-D	100	100	Redirect with conveyance of rollover rights

At 61 days prior to end of Parent service, the Transmission Customer submits a Renewal request (TSR3) on the Redirect (TSR2). Since the Redirect has not yet been acted on by the Transmission Provider, the Transmission Customer also submits a Renewal request (TSR4) on the Parent to hedge against the possibility that ongoing rollover rights may be limited or unavailable on the Redirect:

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	11/1/2008	1/1/2009	100	C-D	100	100	Redirect with conveyance of rollover rights
TSR3	TSR2	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	C-D	100	100	Renewal of service for new term
TSR4	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term

The Transmission Provider provides information on any rollover limitations to the Transmission Customer off-line. The information will clarify the available options for the allocation of the 100 MW of Unexercised Rollover Rights between the Parent and Redirect Path. The example below assumes that the Transmission Customer accepts the Redirect request but limits rollover rights on the Redirect to 75 MWs. The Transmission Provider will not act on either Renewal request until disposition of the Redirect is determined per WEQ-001-9.7.6.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	ACCEPTED	Y/F/P/F/F	11/1/2008	1/1/2009	100	C-D	100	75	Redirect with

												conveyance of rollover rights
TSR3	TSR2	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	C-D	100	100	Renewal of service for new term
TSR4	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term

The Transmission Customer confirms the Redirect with rollover limitations. Once the Transmission Customer confirms the Redirect, the Capacity Eligible for Rollover held on Parent (TSR1) is conveyed to Redirect (TSR2) and the Unexercised Rollover Rights held on the Parent are reduced to 0. Since the Unexercised Rollover Rights on the Redirect are limited by the Transmission Provider, the renewal request (TSR3) on the Redirect must be limited to that amount. The Transmission Provider will also act on renewal of the Parent based on the Unexercised Rollover Rights remaining on the Parent have been reduced to 0, per WEQ-001-20.2.1

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	0	A-B	0	0	Parent reservation
TSR2	TSR1	REDIRECT	No	CONFIRMED	Y/F/P/F/F	11/1/2008	1/1/2009	100	C-D	100	75	Redirect with conveyance of rollover rights
TSR3	TSR2	RENEWAL	N/A	COUNTEROFFER	Y/F/P/F/F	1/1/2009	1/1/2014	75	C-D	75	75	Renewal of service for new term

TSR4	TSR1	RENEWAL	N/A	INVALID	Y/F/P/F/F	1/1/2009	1/1/2014	N/A	A-B	N/A	N/A	Renewal of service for new term

Transmission Customer confirms the Renewal (TSR3) on the Redirect:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Roll Over Flag	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	Y	1/1/2000	1/1/2009	0	A-B	0	0	Parent reservation
TSR2	TSR1	REDIRECT	No	CONFIRMED	Y/F/P/F/F	Y	11/1/2008	1/1/2009	100	C-D	0	0	Redirect with conveyance of rollover rights
TSR3	TSR2	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	Y	1/1/2009	1/1/2014	75	C-D	75	75	Renewal of service for new term
TSR4	TSR1	RENEWAL	N/A	INVALID	Y/F/P/F/F	Y	1/1/2009	1/1/2014	N/A	A-B	N/A	N/A	Renewal of service for new term

Example 14: Renewal of Firm Redirect Prior to Confirmation of Firm Redirect – Rollover Rights Retained on Parent Path

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path “A-B” (Parent) with deadline to exercise rollover rights at 60 days prior to end of Parent.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

OASIS Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

Transmission Customer submits a Redirect (TSR2) in comformance with WEQ-001-9.7, 75 days prior to end of Parent:

OASIS Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	11/1/2008	1/1/2009	100	C-D	100	100	Redirect with conveyance of rollover rights

At 61 days prior to end of Parent, the Transmission Customer submits a Renewal request (TSR3) to exercise rollover rights on the Redirect (TSR2). Since the Redirect has not yet been accepted by the Transmission Provider, the Transmission Customer submits a Renewal request (TSR4) on the Parent (TSR1) to hedge against the possibility that rollover rights may be limited or unavailable on the Redirect:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

TSR2	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	11/1/2008	1/1/2009	100	C-D	100	100	Redirect with conveyance of rollover rights
TSR3	TSR2	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	C-D	100	100	Renewal of service for new term
TSR4	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term

The Transmission Provider provides information on any rollover limitations to the Transmission Customer off-line. The information will clarify the available options for the allocation of the 100 MW of Unexercised Rollover Rights between the Parent and Redirect Path. The example below assumes that the Transmission Customer withdraws the Redirect request with a limitation to the ongoing rollover rights of 75 MWs. The Transmission Provider will not act on either Renewal request until the disposition of the Redirect is determined per WEQ-001-9.7.6.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	COUNTEROFFER	Y/F/P/F/F	11/1/2008	1/1/2009	100	C-D	100	75	Redirect with conveyance of rollover rights
TSR3	TSR2	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	C-D	100	100	Renewal of service for new term

TSR4	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term

The Transmission Customer withdraws the Redirect (TSR2). Once the Transmission Customer withdraws the Redirect,Renewal of TSR2 is now invalid, and the Transmission Provider is free to act on Renewal of the Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	WITHDRAWN	Y/F/P/F/F	11/1/2008	1/1/2009	N/A	C-D	N/A	N/A	Redirect with conveyance of rollover rights
TSR3	TSR2	RENEWAL	N/A	INVALID	Y/F/P/F/F	1/1/2009	1/1/2014	N/A	C-D	N/A	N/A	Renewal of service for new term
TSR4	TSR1	RENEWAL	N/A	ACCEPTED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term

Customer confirms the Renewal of the Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction

TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	0	0	Parent reservation
TSR2	TSR1	REDIRECT	No	WITHDRAWN	Y/F/P/F/F	11/1/2008	1/1/2009	N/A	C-D	N/A	N/A	Redirect with conveyance of rollover rights
TSR3	TSR2	RENEWAL	N/A	INVALID	Y/F/P/F/F	1/1/2009	1/1/2014	N/A	C-D	N/A	N/A	Renewal of service for new term
TSR4	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	100	A-B	100	100	Renewal of service for new term

Example 15: Renewal of Firm Redirect Prior to Confirmation of Firm Redirect – Rollover Rights Conveyed to Firm Redirect

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path "A-B" (Parent) with deadline to exercise rollover rights at 60 days prior to end of service. Rollover rights on path "A-B" are limited to 70 MWs per the original service agreement.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	70	Parent reservation

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

Transmission Customer submits a Renewal request (TSR2) for a portion of rollover rights on the Parent (50 MWs) and then submits a Redirect (TSR3) in comformance with WEQ-001-9.7 at 85 days prior to the end of Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	70	Parent reservation
TSR2	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	50	A-B	50	50	Renewal of service for new term
TSR3	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	10/1/2008	1/1/2009	100	C-D	100	100	Rollover rights conveyed to Redirect

The Transmission Provider accepts the Renewal: The Transmission Provider must delay evaluation of the Redirect (TSR3) until the disposition of the pending Renewal (TSR2) is determined per WEQ-001-9.7.5.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	70	Parent reservation
TSR2	TSR1	RENEWAL	N/A	ACCEPTED	Y/F/P/F/F	1/1/2009	1/1/2014	50	A-B	50	50	Renewal of service for new term
TSR3	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	10/1/2008	1/1/2009	100	C-D	100	100	Rollover rights conveyed to Redirect

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

Transmission Customer confirms Renewal and the Capacity Eligible for Rollover and Unexercised Rollover Rights on the Parent are updated, per WEQ-001-20.2.4:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	50	20	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	50	A-B	50	50	Renewal of service for new term
TSR3	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	10/1/2008	1/1/2009	100	C-D	100	100	Rollover rights conveyed to Redirect

Note that the Unexercised Rollover Rights held on path A-B is 20 MWs reflecting the original Transmission Provider limitation of 70 MWs less the amount of rollover rights exercised on path A-B of 50 MWs. The Capacity Eligible for Rollover, however, is 50 MWs reflecting the original contracted capacity (100 MWs) less the amount of rollover rights exercised on path A-B of 50 MWs. The Transmission Provider must evaluate the Redirect request based on the updated Capacity Eligible for Redirect (50 MWs) on the parent reservation per WEQ-001-9.7.7.

At 61 days prior to end of Parent, the Transmission Customer submits a Renewal request to ensure they meet the notice requirements for exercising rollover rights on the Redirect path. Since the Redirect has not yet been acted on by the Transmission Provider, the Transmission Customer also submits a renewal request on the Parent for the remaining rollover rights on the Parent to hedge against the possibility that ongoing rollover rights may be limited or unavailable on the Redirect:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable	Path Name	Capacity Eligible	Unexercised Rollover	Description of

								at End of Term		for Rollover	Rights	Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	50	20	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	50	A-B	50	50	Renwal of service for new term
TSR3	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	10/1/2008	1/1/2009	100	C-D	100	100	Rollover rights conveyed to Redirect
TSR4	TSR3	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	C-D	100	100	Renewal of service for new term
TSR5	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	20	A-B	20	20	Renewal of service for new term

The Transmission Provider provides information on any rollover limitations to Transmission Customer off-line. The information will clarify the available options for the allocation of the 100 MW of Unexercised Rollover Rights between the Parent and Redirect Path. The example below assumes that the Transmission Customer accepts the Redirect with no limitation to the ongoing rollover rights of 50 MWs. The Transmission Provider will not act on either Renewal request until the disposition of the Redirect is determined per WEQ-001-9.7.6.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	50	20	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	50	A-B	50	50	Renwal of service for

												new term
TSR3	TSR1	REDIRECT	No	COUNTEROFFER	Y/F/P/F/F	10/1/2008	1/1/2009	50	C-D	50	50	Rollover rights conveyed to Redirect
TSR4	TSR3	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	100	C-D	100	100	Renewal of service for new term
TSR5	TSR1	RENEWAL	N/A	QUEUED	Y/F/P/F/F	1/1/2009	1/1/2014	20	A-B	20	20	Renewal of service for new term

The Transmission Customer elects to confirm the Redirect (TSR3). Once the Transmission Customer confirms the Redirect, the Transmission Provider is free to act on the Renewal of the Redirect. Since the rollover rights conveyed to the Redirect are limited to 50 MWs, the Redirect Renewal must be limited to that amount. The Renewal of the Parent is now invalid as all remaining Unexercised Rollover Rights on path A-B were conveyed to path C-D:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	50	A-B	0	0	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	50	A-B	50	50	Renwal of service for new term
TSR3	TSR1	REDIRECT	No	CONFIRMED	Y/F/P/F/F	10/1/2008	1/1/2009	50	C-D	50	50	Rollover rights conveyed to Redirect
TSR4	TSR3	RENEWAL	N/A	COUNTEROFFER	Y/F/P/F/F	1/1/2009	1/1/2014	50	C-D	50	50	Renewal of service for

												new term
TSR5	TSR1	RENEWAL	N/A	INVALID	Y/F/P/F/F	1/1/2009	1/1/2014	N/A	A-B	N/A	N/A	Renewal of service for new term

Transmission Customer confirms the Renewal:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	0	A-B	0	0	Parent reservation
TSR2	TSR1	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	50	A-B	50	50	Renwal of service for new term
TSR3	TSR1	REDIRECT	No	CONFIRMED	Y/F/P/F/F	10/1/2008	1/1/2009	100	C-D	0	0	Rollover rights conveyed to Redirect
TSR4	TSR3	RENEWAL	N/A	CONFIRMED	Y/F/P/F/F	1/1/2009	1/1/2014	50	C-D	50	50	Renewal of service for new term
TSR5	TSR1	RENEWAL	N/A	INVALID	Y/F/P/F/F	1/1/2009	1/1/2014	20	A-B	20	20	Renewal of service for new term

Example 16: Withdrawal of Request for Redirect with Rollover Due to Limited Rollover

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path "A-B" (Parent) with deadline to exercise rollover rights at 60 days prior to end of service. Transmission Customer submits a Redirect on a Firm basis in accordance with WEQ-001-9.7:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

Transmission Customer submits a Redirect (TSR2) in comformance with WEQ-001-9.7, 75 days prior to end of Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	9/1/2008	1/1/2009	100	C-D	100	100	Redirect with conveyance of rollover rights

The Transmission Provider provides information on any rollover limitations to the Transmission Customer off-line. The information will clarify the available options for the allocation of the 100 MW of Unexercised Rollover Rights between the Parent and Redirect Path. The example below assumes that the Transmission Provider and Transmission Customer agree to a COUNTEROFFER of 75 MW.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiabl	Path Name	Capacity Eligible	Unexercised Rollover	Description of

								e at End of Term		for Rollover	Rights	Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	COUNTEROFFER	Y/F/P/F/F	9/1/2008	1/1/2009	75	C-D	75	75	Redirect with conveyance of rollover rights

The Transmission Customer assesses the service offered on the redirect path and elects to withdraw the request and retain the rollover rights on the parent path rather than have rights restricted.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	WITHDRAWN	Y/F/P/F/F	9/1/2008	1/1/2009	75	C-D	75	75	Redirect with conveyance of rollover rights

The Transmission Customer may alternatively request a Redirect on a Firm Basis for the balance of the term of the Parent reservation (TSR1) but without a request for the conveyance of rollover rights. This should be submitted as a Short-Term Redirect.

Example 17: Rebid of Firm Redirect after Restrictions Placed on Rollover Rights

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

Transmission Customer holds Long-Term Point-to-Point service (TSR1) on path "A-B" (Parent) with deadline to exercise rollover rights at 60 days prior to end of service. Transmission Customer submits a Redirect on a Firm Basis in accordance with WEQ-001-9.7:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop TIme	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation

Transmission Customer submits a Redirect (TSR2) in comformance with WEQ-001-9.7, 75 days prior to end of Parent:

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	NA	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	QUEUED	Y/F/P/F/F	9/1/2008	1/1/2009	100	C-D	100	100	Redirect with conveyance of rollover rights

The Transmission Provider provides information on any rollover limitations to the Transmission Customer off-line. The information will clarify the available options for the allocation of the 100 MW of Unexercised Rollover Rights between the Parent and Redirect Path. The Transmission Provider and Transmission Customer agree to a COUNTEROFFER of 75 MW.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiabl	Path Name	Capacity Eligible	Unexercised Rollover	Description of

								e at End of Term		for Rollover	Rights	Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	COUNTEROFFER	Y/F/P/F/F	9/1/2008	1/1/2009	75	C-D	75	75	Redirect with conveyance of rollover rights

The Transmission Customer assesses the service offered on the redirect path and elects to reserve only 50 MW and associated rollover rights on the redirected path. The following rebid is submitted by the customer:The Transmission Provider

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	REBID	Y/F/P/F/F	9/1/2008	1/1/2009	50	C-D	75	75	Redirect with conveyance of rollover rights

The rebid is on the “Capacity” (capacity at end of term) with the understanding that the Transmission Provider will make corresponding reductions to the Capacity Eligible for Rollover and Unexercised Rollover Rights.

The Transmission Provider adjusts the Capacity Eligible for Rollover and the Unexercised Rollover Rights to match the Capacity Available at end of term and accepts the Rebid.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	100	A-B	100	100	Parent reservation
TSR2	TSR1	REDIRECT	No	ACCEPTED	Y/F/P/F/F	9/1/2008	1/1/2009	50	C-D	50	50	Redirect with conveyance of rollover rights

The Transmission Customer Confirms TSR2.

Assignment Reference	Related Reference	Request Type	Rollover Wavied	Status	Service Attributes	Start Time	Stop Time	Capacity Availiable at End of Term	Path Name	Capacity Eligible for Rollover	Unexercised Rollover Rights	Description of Transaction
TSR1	NA	NA	N/A	CONFIRMED	Y/F/P/F/F	1/1/2000	1/1/2009	50	A-B	50	50	Parent reservation
TSR2	TSR1	REDIRECT	No	CONFIRMED	Y/F/P/F/F	9/1/2008	1/1/2009	50	C-D	50	50	Redirect with conveyance of rollover rights

Unexercised Rollover Rights remaining on the Parent are not conveyed to the confirmed Redirect on a Firm basis per WEQ-001-9.7.10. The customer may still exercise a Renewal of the Parent for up to 50 MW if queued before the renewal deadline.

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For Quadrant: WEQ

Requesters: **ESS/ITS Subcommittees**
Request No.: **2009 AP Item 2(a)(ii)(3)**
Request Title: **Rollover Rights on Redirect on a Firm Basis**

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

Changes to WEQ-002

002-4.3.6.1 Customer Capacity Purchase Request (transrequest)

The Customer Capacity Purchase Request (Input) (***transrequest***) is used by the Customer to request the purchase of transmission services or request changes to previously submitted reservations for transmission services. The response simply acknowledges that the Customer's request was received by the OASIS Node. It does not imply that the Seller has received the request. Inputting values into the reference Data Elements is optional.

CUSTOMER_CODE and CUSTOMER_DUNS shall be determined from the registered connection used to input the request.

Supporting "profiles" of service, which request different capacities and/or price for different time periods within a single request, is at the discretion of the Primary Provider. Continuation records may be used to indicate requests for these service profiles; use of continuation records is only supported when using the CSV Format upload of Template data. Each segment of a profile is represented by the set of Data Elements START_TIME, STOP_TIME, CAPACITY_REQUESTED, and BID_PRICE which define the intervals in time over which the specified capacity and price values apply. The initial segment of a profile is defined by the START_TIME, STOP_TIME, CAPACITY_REQUESTED, and BID_PRICE Data Elements specified in the first or only record submitted; subsequent segments are specified in continuation records each containing the appropriate START_TIME, STOP_TIME, CAPACITY_REQUESTED, and BID_PRICE values defining the segment.

For requesting transmission services which include multiple paths, the following fields may be specified using continuation records: PATH_NAME, POINT_OF_RECEIPT, and POINT_OF_DELIVERY. Supporting multiple paths or multiple POINT_OF_RECEIPT and POINT_OF DELIVERY is at the discretion of the Provider.

The earliest START_TIME and latest STOP_TIME indicate the overall requested period of service and cannot be modified by subsequent actions.

When a valid request is received at the OASIS Node, the TSIP assigns a unique ASSIGNMENT_REF value and queues the request with a time stamp. The STATUS for the request is QUEUED. The IMPACTED counter is initially set to 0. REQUEST_TYPE must be specified. If the SELLER is not the Primary

Provider, REQUEST_TYPE must be one of RESALE, FULL_TRANSFER, or PART_TRANSFER.

If the new request is modifying an existing transmission reservation, the Data Elements REQUEST_TYPE and RELATED_REF must be entered. RELATED_REF contains the ASSIGNMENT_REF for the transmission reservation being modified, and REQUEST_TYPE must be one of MATCHING, REDIRECT, DEFERRAL, RENEWAL, RELINQUISH, or a Primary Provider registered value.

Specification of a value YES in the PRECONFIRMED field authorizes the TSIP to automatically change the STATUS field in the ***transstatus*** Template to CONFIRMED when that request is ACCEPTED by the Seller.

Specification of a value Y in the ROLLOVER_WAIVED field indicates to the Transmission Provider that the Transmission Customer is voluntarily waiving the conveyance of any potential on-going rollover (renewal) rights that may otherwise be available in association with the requested service.

Template: **transrequest**

1. **Input**

   CONTINUATION_FLAG
   SELLER_CODE (Primary or Reseller)
   SELLER_DUNS
   PATH_NAME
   POINT_OF_RECEIPT
   POINT_OF_DELIVERY
   SOURCE
   SINK
   CAPACITY_REQUESTED
   SERVICE_INCREMENT
   TS_CLASS
   TS_TYPE
   TS_PERIOD
   TS_WINDOW
   TS_SUBCLASS
   STATUS_NOTIFICATION
   START_TIME
   STOP_TIME
   BID_PRICE
   PRECONFIRMED
   ANC_SVC_LINK
   POSTING_REF (Optionally set by Customer)

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SALE_REF (Optionally set by Customer)
REQUEST_REF (Optionally set by Customer)
DEAL_REF (Optionally set by Customer)
CUSTOMER_COMMENTS
REQUEST_TYPE (Required for request changes)
RELATED_REF (Required for request changes)
ROLLOVER_WAIVED (Only applicable to Long-Term Firm PTP service requests)

2. **Response** (acknowledgment)

RECORD_STATUS
CONTINUATION_FLAG
ASSIGNMENT_REF (assigned by TSIP)
SELLER_CODE
SELLER_DUNS
PATH_NAME
POINT_OF_RECEIPT
POINT_OF_DELIVERY
SOURCE
SINK
CAPACITY_REQUESTED
SERVICE_INCREMENT
TS_CLASS
TS_TYPE
TS_PERIOD
TS_WINDOW
TS_SUBCLASS
STATUS_NOTIFICATION
START_TIME
STOP_TIME
BID_PRICE
PRECONFIRMED
ANC_SVC_LINK
POSTING_REF
SALE_REF
REQUEST_REF
DEAL_REF
CUSTOMER_COMMENTS
REQUEST_TYPE
RELATED_REF
ROLLOVER_WAIVED
ERROR_MESSAGE

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
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002-4.3.6.2 Status of Customer Purchase Request/Reservation (transstatus)

The **Status of Customer Purchase Request/Reservation** (***transstatus***) is provided upon the request of any Customer or Provider to indicate the current status of one or more reservation records. Users may also view any transaction's status. However, the SOURCE and SINK may be masked for User requests until Transmission Providers must make source and sink information available at the time the request status posting is updated to show that a transmission request is confirmed.

Continuation records may be returned in association with a transmission reservation to convey information regarding: 1) sale or assignment of transmission rights on the secondary market (reassignments), 2) profiled requests, or 3) service over multiple paths. Each continuation record associated with a transmission reservation shall be identified by the CONTINUATION_FLAG Data Element set to 'Y' and include the ASSIGNMENT_REF Data Element.

When a transmission reservation request acquires its rights to transmission service as the result of a sale or assignment of transmission rights on the secondary market, the identity of the original reservation, capacity, and time interval over which rights are assigned to the new reservation are defined by the Data Elements REASSIGNED_REF, REASSIGNED_CAPACITY, REASSIGNED_START_TIME, and REASSIGNED_STOP_TIME. These Data Elements will be returned in continuation records when more than one set of reassignment information is associated with a reservation.

If the transmission reservation has an associated profile, either as a result of the Transmission Customer's submission of CAPACITY_REQUESTED and/or BID_PRICE varying over time (support for Customer reservation profiles is at the discretion of the Provider or the Seller's offering of partial service or negotiation of price, the set of data elements for START_TIME, STOP_TIME, CAPACITY_REQUESTED, BID_PRICE, CAPACITY_GRANTED, OFFER_PRICE and CEILING_PRICE will be returned in continuation records for each segment of the request/reservation profile.

If the Provider supports reservations submitted on multiple paths, continuation records specifying PATH_NAME, POINT_OF_RECEIPT, and POINT_OF_DELIVERY associated with the reservation would be returned in continuation records.

The AFFILIATE_FLAG will be set by the TSIP to indicate whether or not the Customer is an affiliate of the Primary Provider. The NEGOTIATED_PRICE_FLAG will be set by the TSIP to indicate whether the

OFFER_PRICE is higher, lower, or the same as the BID_PRICE. Any time that a confirmed transmission reservation's rights to schedule up to the amount of CAPACITY_GRANTED is reduced, either due to secondary market sales, partial displacements, Provider initiated "recalls" of capacity, etc., the IMPACTED Data Element shall be incremented. Specific information regarding the MW level and reason for reduction in reserved capacity is viewable using the ***reduction*** Template.

The PRIMARY_PROVIDER_APPROVAL data element is set by the Primary Provider to indicate their approval of PART_TRANSFER and FULL_TRANSFER requests. In all other types of transmission requests, this element will be null.

The PRIMARY_PROVIDER_PROVISIONS data element is set to 'Y' by the Primary Provider when certain provisions are imposed on the reservation that may be viewed by issuing a query for the ***rollover*** and ***cco*** templates, otherwise null shall be used.

Template: **transstatus**

1. **Query**

   SELLER_CODE*
   SELLER_DUNS*
   CUSTOMER_CODE*
   CUSTOMER_DUNS*
   PATH_NAME*
   POINT_OF_RECEIPT*
   POINT_OF_DELIVERY*
   SERVICE_INCREMENT*
   TS_CLASS*
   TS_TYPE*
   TS_PERIOD*
   TS_WINDOW*
   TS_SUBCLASS*
   STATUS*
   START_TIME (Beginning time of service)
   STOP_TIME
   START_TIME_QUEUED (Beginning time queue)
   STOP_TIME_QUEUED
   NEGOTIATED_PRICE_FLAG
   ASSIGNMENT_REF
   REASSIGNED_REF
   RELATED_REF
   SALE_REF

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REQUEST_REF
DEAL_REF
COMPETING_REQUEST_FLAG
TIME_OF_LAST_UPDATE

2. **Response**

CONTINUATION_FLAG
ASSIGNMENT_REF
SELLER_CODE
SELLER_DUNS
CUSTOMER_CODE
CUSTOMER_DUNS
AFFILIATE_FLAG (Set by TSIP)
PATH_NAME
POINT_OF_RECEIPT
POINT_OF_DELIVERY
SOURCE
SINK
CAPACITY_REQUESTED
CAPACITY_GRANTED
SERVICE_INCREMENT
TS_CLASS
TS_TYPE
TS_PERIOD
TS_WINDOW
TS_SUBCLASS
NERC_CURTAILMENT_PRIORITY
OTHER_CURTAILMENT_PRIORITY
START_TIME
STOP_TIME
CEILING_PRICE
OFFER_PRICE
BID_PRICE
PRICE_UNITS
PRECONFIRMED
ANC_SVC_LINK
ANC_SVC_REQ
POSTING_REF
SALE_REF
REQUEST_REF
DEAL_REF
IMPACTED (Greater than 0, if another reservation impacts this reservation)
COMPETING_REQUEST_FLAG

REQUEST_TYPE
RELATED_REF
NEGOTIATED_PRICE_FLAG ("L" if Seller accepted Price is lower than OFFER_PRICE in *transoffering* Template; "H" if higher; otherwise blank)
STATUS
STATUS_NOTIFICATION
STATUS_COMMENTS
TIME_QUEUED
RESPONSE_TIME_LIMIT
TIME_OF_LAST_UPDATE
PRIMARY_PROVIDER_COMMENTS
SELLER_REF
SELLER_COMMENTS
CUSTOMER_COMMENTS
SELLER_NAME
SELLER_PHONE
SELLER_FAX
SELLER_EMAIL
CUSTOMER_NAME
CUSTOMER_PHONE
CUSTOMER_FAX
CUSTOMER_EMAIL
REASSIGNED_REF
REASSIGNED_CAPACITY (Capacity from each previous transaction)
REASSIGNED_START_TIME
REASSIGNED_STOP_TIME
PRIMARY_PROVIDER_APPROVAL
PRIMARY_PROVIDER_PROVISIONS
ROLLOVER_WAIVED

002-4.3.6.2.1 Renewal Provisions (***rollover***)

The Renewal Provisions **(*rollover*)** template provides users with additional information related to the specific provisions for exercising the right to renewal/rollover the associated transmission service reservation.

The query parameters associated with this template may be specified by the user to limit the set of service reservations whose Renewal Provisions are to be returned in the template response.

The deadline for submitting a RENEWAL request to exercise rollover rights (if any) shall be captured in the RENEWAL_DUE_TIME data element. The maximum amount of reserved capacity that is considered eligible for on-going

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rollover rights shall be made available in the ROLLOVER_ELIGIBLE data element.

If known and applicable, duration and capacity limitations to renewal/rollover rights associated with a confirmed reservation are documented in one or more sets of ROLLOVER_START_TIME, ROLLOVER_STOP_TIME, and ROLLOVER_CAPACITY data elements returned as continuation records. Each continuation record associated with a given transmission reservation shall be identified by the CONTINUATION_FLAG Data Element set to 'Y' and include the ASSIGNMENT_REF Data Element.

The ROLLOVER_ELIGIBLE and ROLLOVER_CAPACITY over time data elements shall be updated to reflect changes in these related service attributes due to exercising rollover rights (renewals) or conveyance of those rollover rights to other service reservations as applicable.

If there is no additional renewal/rollover information associated with a reservation selected via the query parameters, there will be no record returned in the template response for that reservation.

The query parameters below are to be applied in the same way as to the associated reservation data elements as defined in the ***transstatus*** template to select the specific reservations whose renewal/rollover information is to be returned.

Template: ***rollover***

1. **Query**

   SELLER_CODE*
   SELLER_DUNS*
   CUSTOMER_CODE*
   CUSTOMER_DUNS*
   PATH_NAME*
   POINT_OF_RECEIPT*
   POINT_OF_DELIVERY*
   SERVICE_INCREMENT*
   TS_CLASS*
   TS_TYPE*
   TS_PERIOD*
   TS_WINDOW*
   TS_SUBCLASS*
   START_TIME
   STOP_TIME
   START_TIME_QUEUED

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STOP_TIME_QUEUED
ROLLOVER_START_TIME
ROLLOVER_STOP_TIME
ASSIGNMENT_REF
TIME_OF_LAST_UPDATE

2. **Response**
CONTINUATION_FLAG
ASSIGNMENT_REF
RENEWAL_DUE_TIME
ROLLOVER_ELIGIBLE
ROLLOVER_START_TIME
ROLLOVER_STOP_TIME
ROLLOVER_CAPACITY
TIME_OF_LAST_UPDATE

Additions to WEQ-003

ROLLOVER_ELIGIBLE	ROLLELG	0{NUMERIC}12	Non-negative number in units of MW	The maximum amount of reserved capacity that is to be considered eligible for granting of on-going rollover rights. The actual amount available to be renewed over time will be the lower of ROLLOVER_ELIGIBLE and ROLLOVER_CAPACITY.
ROLLOVER_WAIVED	ROLLWV	0{ALPHA}1	Valid Values: Y Null	Used by Transmission Customer to indicate their waiving (ROLLOVER_WAIVED='Y') of any consideration for on-going rollover rights that may be applicable to the service requested at the time of submittal.

Changes to WEQ-013

013-2.6.1 **ORIGINAL Requests**

ORIGINAL requests shall be submitted by the Transmission Customer to arrange for new transmission or ancillary service with the Primary Provider.

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The following are specific restrictions or requirements for OASIS service requests with REQUEST_TYPE of ORIGINAL. If REQUEST_TYPE is not specified by the Transmission Customer and SELLER_CODE and SELLER_DUNS are the same as PRIMARY_PROVIDER_CODE and PRIMARY_PROVIDER_DUNS, OASIS shall default REQUEST_TYPE to ORIGINAL.

Data Element	Restriction/Requirement
REQUEST_TYPE	Must be ORIGINAL
RELATED_REF	Must be null
SELLER_CODE	Must match PRIMARY_PROVIDER_CODE
SELLER_DUNS	Must match PRIMARY_PROVIDER_DUNS
ROLLOVER_WAIVED	If the Transmission Customer does not wish a Long-Term Firm PTP request to be evaluated for conveyance of rollover rights, the Transmission Customer must submit the request with the ROLLOVER_WAIVED data element set to 'Y' in the ***transrequest*** template.

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

Additional requirements related to the specification of service points, attributes, pricing, and timing are subject to the Primary Provider's business practices.

The Transmission Customer may submit a time varying profile of capacity as allowed by the Primary Provider's business practice by repeating the template data elements of BID_PRICE, CAPACITY_REQUESTED, START_TIME and STOP_TIME in template continuation records. The segments of any submitted profile must not overlap in time.

Once submitted by the Customer the earliest START_TIME and latest STOP_TIME defines the overall term of service. Any further negotiation or offer of partial service may modify the segments/profiles times, but any such modifications must span the entire period from the original earliest START_TIME to latest STOP_TIME.

If the Transmission Customer does not wish a Long-Term Firm PTP request to be evaluated for conveyance of rollover rights, the Transmission Customer must submit the request with the ROLLOVER_WAIVED data element set to 'Y' in the ***transrequest*** template.

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013-2.6.1.3 Rollover Rights

For transmission services that have ongoing rollover or renewal rights, the Transmission Provider shall document those rights and any limitations over time through the ***rollover*** template data elements RENEWAL_DUE_TIME, ROLLOVER_ELIGIBLE, ROLLOVER_START_TIME, ROLLOVER_STOP_TIME, and ROLLOVER_CAPACITY. The Transmission Provider must also flag that the service request/reservation has associated rollover rights by setting the ***transstatus*** template PRIMARY_PROVIDER_PROVISIONS data element to "Y". The ROLLOVER_ELIGIBLE data element is equivalent to the Capacity Eligible for Rollover or conveyance of rollover rights to a qualified Redirect on a Firm Basis; the ROLLOVER_CAPACITY data element is equivalent to the remaining Unexercised Rollover Rights available over time. Continuation records shall be used if the ROLLOVER_CAPACITY value changes as a function of time by listing each applicable time interval and capacity eligible for rollover/renewal in the ROLLOVER_START_TIME, ROLLOVER_STOP_TIME and ROLLOVER_CAPACITY data elements. The first value for ROLLOVER_START_TIME shall be set to the value of the latest STOP_TIME value associated with the request/reservation as shown in the ***transstatus*** template response, i.e., ***rollover*** template response records begin at the end of the transmission service requested/reserved. If there is no limitation on rollover rights, ROLLOVER_STOP_TIME shall be null and the ROLLOVER_CAPACITY shall indicate the capacity eligible for rollover for all future time.

On confirmation of any RENEWAL or REDIRECT requests eligible for conveyance of rollover rights, the values for the ROLLOVER_ELIGIBLE, ROLLOVER_START_TIME, ROLLOVER_STOP_TIME, and ROLLOVER_CAPACITY data elements shall be updated appropriately and returned in response to the ***rollover*** template query.

013-2.6.2 **RENEWAL Requests**

Transmission Customers shall use the REQUEST_TYPE of RENEWAL only to exercise rollover rights. RENEWAL requests must always specify the Primary Provider as SELLER.

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The following are specific restrictions or requirements for OASIS service requests with REQUEST_TYPE of RENEWAL.

Data Element	Restriction/Requirement
REQUEST_TYPE	Must be RENEWAL
RELATED_REF	Must specify the ASSIGNMENT_REF that is associated with an existing confirmed Firm transmission service reservation or pending Redirect on a Firm basis held by the Transmission Customer that 1) has rollover rights, and 2) that has not had the deadline for the exercise of rollover rights pass.
SELLER_CODE	Must match PRIMARY_PROVIDER_CODE
SELLER_DUNS	Must match PRIMARY_PROVIDER_DUNS
PATH	Must represent the same corresponding service points in the reservation/request specified in RELATED_REF
POINT_OF_RECEIPT	
POINT_OF_DELIVERY	
SOURCE	
SINK	
SERVICE_INCREMENT	Must specify a set of valid transmission service attributes recognized by the Primary Provider as a valid service designation eligible for exercising of rollover rights held by the reservation/request specified in RELATED_REF
TS_CLASS	
TS_TYPE	
TS_PERIOD	
TS_WINDOW	
TS_SUBCLASS	
START_TIME	Must match the STOP_TIME of the reservation/request specified in RELATED_REF
STOP_TIME	With START_TIME, must specify a valid interval of service eligible for exercising of renewal/rollover rights held by the reservation/request specified in RELATED_REF
CAPACITY_REQUESTED	Must be less than or equal to the amount of capacity eligible for renewal/rollover over the interval of service
BID_PRICE	Must specify the price to be paid for the service requested
ROLLOVER_WAIVED	If the Transmission Customer does not wish a Long-Term Firm PTP request to be evaluated for conveyance of rollover rights, the Transmission Customer must submit the request with the ROLLOVER_WAIVED data element set to 'Y' in the ***transrequest*** template.

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Note: Elements are listed on basis of importance, which may be different from the order required in the template.

RENEWAL requests must be submitted on OASIS prior to the deadline for exercising rollover rights as established by the Tariff or business practice.

CUSTOMER_CODE and CUSTOMER_DUNS in the RENEWAL request should correspond to the CUSTOMER_CODE and CUSTOMER_DUNS in the RELATED_REF reservation. If not, the Transmission Provider should verify that the submitting Customer has a valid agency agreement with the original transmission service agreement holder and is authorized to submit such a request on behalf of that entity.

The transmission service attributes, e.g., TS_CLASS, etc., should match the corresponding attributes in the reservation specified in RELATED_REF. However, changes may be made to these attributes over time such that some differences are necessary to accommodate changes in the Primary Provider's business practices. This also applies to changes in service points, e.g., PATH, etc., over time.

RENEWAL requests may be subject to offering of partial service as a result of competition and/or failure to exercise a right of first refusal.

If the Transmission Customer does not wish a Long-Term Firm PTP request to be evaluated for conveyance of rollover rights, the Transmission Customer must submit the request with the ROLLOVER_WAIVED data element set to 'Y' in the ***transrequest*** template.

013-2.6.5.1 REDIRECT on a Firm Basis

A Transmission Customer holding confirmed firm point-to-point transmission rights may request the use of those rights on alternate points of receipt and/or delivery on a firm basis by submission of a REDIRECT request to the Primary Provider as Seller. The following information must be submitted by the Transmission Customer in the REDIRECT request via the ***transrequest*** template.

Data Element	Restriction/Requirement
REQUEST_TYPE	Must be REDIRECT
RELATED_REF	Must identify by ASSIGNMENT_REF a confirmed transmission service reservation for firm point-to-point service held by the submitting Transmission Customer
SELLER_CODE	Must match PRIMARY_PROVIDER_CODE

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Data Element	Restriction/Requirement
SELLER_DUNS	Must match PRIMARY_PROVIDER_DUNS
PATH	Must represent the new transmission service points being requested
POINT_OF_RECEIPT	
POINT_OF_DELIVERY	
SOURCE	
SINK	
SERVICE_INCREMENT	Must represent a set of valid transmission service attributes for firm point-to-point service offered by the Primary Provider and being requested on the new service points by the Transmission Customer
TS_CLASS	
TS_TYPE	
TS_PERIOD	
TS_WINDOW	
TS_SUBCLASS	
START_TIME	Must specify the requested start of transmission service and must be within the bounds of START_TIME specified in the reservation identified in RELATED_REF
STOP_TIME	Must specify the requested stop/end of transmission service and must be within the bounds of STOP_TIME specified in the reservation identified in RELATED_REF, and with START_TIME must represent a valid interval of service for the firm point-to-point service being requested
CAPACITY_REQUESTED	Must specify the amount of transmission capacity being requested
BID_PRICE	Should specify the price for the service being requested; may be null
ROLLOVER_WAIVED	May specify the desire to waive conveyance of rollover to the REDIRECT by specifying 'Y' at time of submission of the REDIRECT request (retains rollover rights on the Parent reservation)

Note: Elements are listed on basis of importance, which may be different from the order required in the template.

The Primary Provider shall evaluate each REDIRECT on a Firm basis as any other new request for firm point-to-point transmission service. Primary Provider business practices establish the requirements for service duration, submission time, evaluation time, confirmation time, etc.

OASIS or Primary Provider procedures should verify that the transmission reservation identified in RELATED_REF meets all the requirements to support the redirect of transmission rights to the new service points. This should include the validation that the current rights, the Capacity Available for Redirect, held on that reservation in the amount of the REDIRECT over time

have not been encumbered by any other confirmed redirects, resales, schedules, CCO conditions, etc. This capacity validation may occur at any point in the request process, but shall always be performed prior to setting the REDIRECT STATUS to CONFIRMED.

Once CONFIRMED, the transmission rights held on the RELATED_REF reservation in the amount of the REDIRECT shall be permanently released by the Primary Provider and conveyed to the REDIRECT reservation. The only mechanism for the Transmission Customer to return to the original points of receipt and/or delivery is to submit another REDIRECT request.

The impact on ATC for the reservation identified by RELATED_REF shall be released and the impact of the REDIRECT transaction on ATC shall be accounted for in the amount and over time of the redirect simultaneously.

The impact of the REDIRECT transaction on the reservation(s) identified by RELATED_REF shall be posted and viewable using the ***reduction*** template.

OASIS or Primary Provider procedures shall also apply any outstanding conditions that may exist from the Parent CCO Reservation to the REDIRECT reservation, if applicable, (e.g., Number-of-Hours Criteria or System-Conditions Criteria) in accordance with WEQ 001-n.5.2.2.1 and WEQ 013-2.6.1.4. and any outstanding conditions shall be viewable using the ***cco*** template.

If the REDIRECT is eligible for the conveyance of rollover/renewal rights, these rights shall be communicated through the ~~***transstatus***~~ ***rollover*** template data elements RENEWAL_DUE_TIME, ROLLOVER_ELIGIBLE, ROLLOVER_START_TIME, ROLLOVER_STOP_TIME, and ROLLOVER_CAPACITY. Conveyance of rollover rights to the REDIRECT request/reservation may have an impact on those rights held on the RELATED_REF reservation. These impacts on the RELATED_REF reservation shall be documented through an update to the ***rollover*** template data elements ROLLOVER_ELIGIBLE, ROLLOVER_START_TIME, ROLLOVER_STOP_TIME, and ROLLOVER_CAPACITY ~~data elements~~ associated with the RELATED_REF.

If the Transmission Customer does not wish a Long-Term Firm PTP REDIRECT request to be evaluated for conveyance of rollover rights, the Transmission Customer must submit the request with the ROLLOVER_WAIVED data element set to 'Y' in the ***transrequest*** template.

4. SUPPORTING DOCUMENTATION

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittees
Request No.: 2009 AP Item 2(a)(ii)(3)
Request Title: Rollover Rights on Redirect on a Firm Basis

a. Description of Request:
In the FERC Order 676, under Docket No. RM05-5-000 dated April 25, 2006, the Commission made the following conclusions:

> *51. Standard 001-9.7 does not specify clearly the parties' responsibilities with respect to the ability of a customer requesting a firm redirect to obtain rollover rights on the redirect path.[1] Under section 22.2 of the pro forma OATT, a request for a firm redirect is like a request for new transmission service. The transmission provider, therefore, is required to offer rollover rights to a customer requesting a firm redirect if rollover rights are available on the redirect path. However, the transmission provider may not operationally be able to offer rollover rights on the requested redirect path due to reasonably forecasted native load needs for the transmission capacity.*
>
> *52. Standard 001-9.7 provides that "unless otherwise mutually agreed to by the primary provider and original customer, a request for a Redirect on a Firm basis … [does not] confer any renewal rights on the redirect path." (Emphasis added). This phrase could be interpreted to mean that the parties to an agreement may mutually agree to eliminate rollover rights and that a transmission provider may agree, but is not obligated, to offer rollover rights on the redirect path even when such rights are available. These provisions are inconsistent with the pro forma OATT and the Commission's policies. In addition, the last phrase of the standard also conflicts with the last sentence of section 22.2 of the pro forma OATT, which is limited to the period while the new request for service is pending. Therefore, we will not adopt Standard 001-9.7 at this time, but will allow the WEQ to reconsider the standard and to adopt a revised standard consistent with the Commission's policies.*
>
> *53. The comments on this issue show that there is confusion in the industry regarding the provisions of sections 22.1 and 22.2 of the pro forma OATT. To assist the WEQ in developing a standard that is consistent with the Commission's policy, we offer the following guidance.*
>
> *54. Section 22 of the pro forma OATT addresses changes in service specifications. Section 22.1 pertains to modifications on a non-firm basis and section 22.2 covers modifications on a firm basis. Under section 22.1,*

[1] Standard 001-9.7 appears consistent with section 22.2 of the existing pro forma OATT insofar as it provides that a customer requesting a firm redirect does not relinquish its rollover rights over its primary path simply by making the request.

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a firm point-to-point transmission customer may request non-firm transmission service at secondary receipt and delivery points (points other than those specified in the service agreement). Section 22.1(c) provides that the transmission customer shall retain its right to schedule firm point-to-point transmission service at the receipt and delivery points specified in its relevant service agreement in the amount of its original capacity reservation.

55. Under section 22.2, any request by a transmission customer to modify receipt and delivery points on a firm basis is treated as a new request for service. This section also provides that, "[w]hile such new request is pending, the Transmission Customer shall retain its priority for service at the existing firm Receipt and Delivery Points specified in its Service Agreement" (emphasis added). Once the new request is accepted and confirmed, the transmission customer loses all rights to the original receipt and delivery points, including rollover rights associated with the original path.

56. Bonneville asserts that the Commission has stated that the redirect requestor retains section 2.2 reservation priority rights on its original path. [2] *Under section 22.1(c), which pertains to redirects on a non-firm basis, the transmission customer retains its right to schedule firm point-to-point service on its original path. This means that the transmission customer retains its original rights on its original path including its rollover rights on its original path and the requestor does not obtain new rollover rights on the redirected path. However, there is no similar provision in section 22.2 for redirects on a firm basis.* [3]

57. Southern Companies argues that a request by a transmission customer to redirect service on a firm basis cannot change that customer's rollover rights on the original path and does not confer rollover rights on the redirected path. We disagree. Section 22.2 provides that, while a transmission customer's request for new service on a firm basis is

[2] As explained in the notice of inquiry in Docket No. RM05-25-000, 70 FR 55796, FERC Stats. & Regs. ¶ 35,553 at P 18 (2005), section 2.2 of the pro forma OATT (Reservation Priority for Existing Firm Service Customers) provides that "existing firm service customers (wholesale requirements and transmission-only, with a contract term of one-year or more) have the right to continue to take transmission service from the public utility transmission provider when the contract expires, rolls over or is renewed. It specifically provides that this transmission reservation priority is independent of whether the existing customer continues to purchase capacity and energy from the public utility transmission provider or elects to purchase capacity and energy from another supplier."

[3] Bonneville at 2.

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pending, the transmission customer retains its priority for service on its existing path, including rollover rights on its existing path. However, once a transmission customer's request for firm transmission service at new receipt and delivery points is accepted and confirmed, the new reservation governs the rights at the new receipt and delivery points and the transmission customer can obtain rollover rights with respect to the redirected capacity. In addition, at the time the transmission customer's request for the redirected capacity is accepted and confirmed, the transmission customer loses all rights to the original receipt and delivery points, including rollover rights associated with the original path.

58. As part of its process of review, NAESB identified several questions that were raised regarding rollover rights under the pro forma OATT during members' deliberations on Standard 001-9.7. These questions generally raised issues with respect to whether customers retain rollover rights on both the original and the redirected path.

59. A long-term firm transmission customer may request multiple, successive redirects and, as provided in section 22.2 of the pro forma OATT, each such successive request is treated as a new request for service in accordance with section 17 of the pro forma OATT. As a new request for service, each request is subject to the availability of capacity and subject to the possibility that the transmission provider may not be able to provide rollover rights on the new, redirected path. For example, assume a transmission customer with a one-year agreement for service between points A and B. If the transmission customer seeks to redirect on a firm basis in month 4 to points C to D and then redirect back to points A to B thereafter, at the end of the one year agreement the transmission customer would have rollover rights only with respect to points A to B.[4] With the same assumptions, if the transmission customer begins with points A to B, but redirects in month 4 to points C to D for the remainder of the one-year agreement, the transmission customer would have rollover rights only with respect to points C to D. If the transmission provider is unable to provide rollover rights on any redirected path, whether to points C to D or, thereafter, to points A to B, it would have to demonstrate at the

[4] The Commission assumes that a transmission customer would make the two requests to redirect to points C to D and then back to points A to B at the same time. Otherwise, the transmission customer would put itself at risk of not being able to redirect back to points A to B because of an intervening request for transmission service.

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time of the redirect request that it has native load growth or contracts that commence in the future that prevent it from providing rollover rights.[5]

60. If a transmission provider claims, either at the time of the original transmission request or at the time of a redirect request, that it is unable to provide rollover rights because it has native load growth or a contract that commences in the future, it must still offer transmission service for the time preceding the native load growth or commencement of the future contract. As explained above, however, it may limit rollover rights based on native load growth or contracts that commence in the future.

61. Further, if a transmission customer with a long-term firm transmission agreement requests to redirect on a firm basis for one month and then redirect on a firm basis back to its original receipt and delivery points for the remainder of the term of the agreement, such requests do not convert its existing long-term firm transmission service agreement into separate short-term transmission service agreements.[6] Under this scenario, the transmission customer has rollover rights for the original receipt and delivery points, because those are the points to which it has rights at the end of the agreement.

In the FERC Order 676-A, under Docket No. RM05-5-002 issued September 21, 2006, the Commission made the following conclusions:

Rollover Rights

Rehearing Requests

5. Southern Companies requests that the Commission clarify, or, in the alternative, grant rehearing of, certain findings in Order No. 676. Specifically, Southern Companies disagrees with the guidance provided in Order No. 676 concerning rollover rights and argues that the guidance provided by the Commission is inconsistent with the Commission's pro forma OATT adopted in Order No. 888.[2] Southern Companies objects to the Commission's guidance that, under section 22.2 of the Commission's pro forma OATT, a transmission customer may request multiple, successive redirects and that each redirect is treated as a new request for

[5] See, e.g., Tenaska Power Services Co. v. Southwest Power Pool, Inc., 99 FERC 61,344 (2002), reh'g denied, 102 FERC ¶ 61,140 at P 33, 38 (2003); Nevada Power Company, 97 FERC ¶ 61,324, at 62,492 (2001).
[6] See, e.g., Commonwealth Edison Co., 95 FERC ¶ 61,027 (2001).
[2] Southern Companies Rehearing Request at 3-5.

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service with rollover rights.[3] Southern Companies finds this inconsistent with the fact that section 2.2 of the Commission's pro forma OATT provides rollover rights only for long-term firm transmission service. It argues that rollover rights do not accompany requests for short-term redirects of firm transmission service.

6. Midwest ISO argues that there should be no rollover rights on a redirect path. Midwest ISO contends that the guidance in Order No. 676 that the "transmission provider, therefore, is required to offer rollover rights to a customer requesting a firm redirect if rollover rights are available on the redirect path" is inconsistent with the Commission's pro forma OATT.[4]

Commission Conclusion

7. In Order No. 676, the Commission adopted a number of NAESB standards regarding redirects, but declined to adopt Standard 001-9.7 regarding rollover rights, finding that the standard did not clearly define parties' rights and obligations and appeared to be inconsistent with the Commission's pro forma OATT and the Commission's policies.[5] The Commission provided guidance to NAESB concerning our current precedents under Order No. 888 regarding rollover of service as it related to redirects to assist NAESB if it were to try to develop a new standard. Southern Companies and Midwest ISO seek rehearing of the Commission's policies with respect to rollover rights and redirects.

8. Because the Commission did not adopt the NAESB standard on rollover rights and redirects, the Commission made no changes to its existing Order No. 888 policies concerning rollovers and redirects. Thus, no action was taken in Order No. 676 that would be the proper subject of a request for rehearing. As such, Southern Companies and Midwest ISO must continue to comply with their OATTs and Order No. 888[6] in administering their policies with respect to rollover rights and redirects. The related issues raised by Southern Companies and Midwest ISO can better be

[3] Order No. 676 at P 59.
[4] Midwest ISO Rehearing at 5.
[5] Order No. 676 at P 52.
[6] See Commonwealth Edison Co., 95 FERC ¶ 61,027, at 61,083 (2001) ("request to change a delivery point on a firm basis for one month and then to revert to its original delivery point does not convert its existing long-term firm transmission service agreement into two separate short-term transmission service agreements"); American Electric Power Service Corp., 97 FERC ¶ 61,207, at 61,905-06 (2001) ("redirect request made by Exelon did not convert Exelon's long-term firm transmission service to short-term service, and, therefore, did not affect Exelon's rollover rights under its long-term firm transmission service agreement").

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addressed in individual cases in which they arise than in this rulemaking, which has not changed the requirements of Order No. 888 regarding redirects and rollover rights. Moreover, issues with respect to general modifications to the Commission's rollover and redirect policies have been posed in Docket No. RM05-25-000,[7] which would be the more appropriate venue for Southern Companies and Midwest ISO to raise their concerns with the Commission's rollover and redirect policies.

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions regarding Redirects and Rollover rights:

1280. Commission policy allows a redirect of firm, long-term service to retain rollover rights, even if the redirect is requested for a shorter period. In other words, the rollover right follows the redirect, regardless of the duration of the redirect. Contrary to the comments of Bonneville, MISO, and Southern, the Commission did not impose this requirement for the first time in Order No. 676, but merely provided guidance to the industry by restating Commission policy on this matter. The Commission has explained in prior orders that a transmission customer making a firm redirect request does not convert its original long-term firm transmission service to short-term service, nor does it lose its rollover rights under its long-term firm transmission service agreement. The Commission's concern underlying this policy is that long-term customers should not need to choose between redirecting on a firm basis and maintaining rollover rights, rather their rollover rights should be retained consistent with the long-term nature of their service.

1281. In Commonwealth Edison Co., the Commission explained that a "request to change a delivery point on a firm basis for one month and then to revert to its original delivery point does not convert its existing long-term firm transmission service agreement into two separate short-term transmission service agreements."782 The Commission stated that section 22.2 was intended to provide flexibility to transmission customers to permit them to react in a competitive market and that some amount of this flexibility would be lost if a long-term firm transmission customer seeking to modify its delivery points would lose its rollover rights.783 782 95 FERC ¶ 61,027 at 61,083 (2001). 783 The Commission, however, recognized that this flexibility was not unlimited – any change to a delivery

[7] Preventing Undue Discrimination and Preference in Transmission Services, Notice of Proposed Rulemaking, FERC Stats. & Regs., Proposed Regulations ¶ 32,603 (2006).

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point is treated as a new request for service for purposes of the availability of capacity.

1282. The Commission affirmed this policy in American Electric Power Service Corp.784 In that case, a long-term transmission customer (Exelon) had been granted a short-term redirect, but denied rollover rights on the redirected path. The Commission found the denial of rollover rights was improper, since the "redirect request made by Exelon did not convert Exelon's long-term firm transmission service to short-term service, and therefore, did not affect Exelon's rollover rights under its long-term firm transmission service agreement."785 Thus, there is no inconsistency between the Commission's redirect policy and Order No. 676.

In the FERC Order 890-A under Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 dated December 28, 2007, the Commission made the following conclusions regarding Redirects and Rollover rights:

Modification of Receipt or Delivery Points
[note: Paragraphs 697 and 698 are from the summary section – summarizing prior Commission Decisions]

697. Pursuant to Section 22 of the pro forma OATT, a transmission customer taking firm point-to-point service may modify its receipt and delivery points, i.e., redirect its service, on either a non-firm or firm basis. In Order No. 676, the Commission adopted the "Standards for Business Practices and Communication Protocols for Public Utilities" developed by the NAESB's Wholesale Electric Quadrant (WEQ).[8] The WEQ standards include standards addressing requirements for redirects on both a firm and non-firm basis, all of which were incorporated by reference into the Commission's regulations except for WEQ Standard 001-9.7, which addressed the impact of redirects on the rollover rights of a long-term transmission customer. Order No. 676 directed the WEQ to reconsider WEQ Standard 001-9.7 and develop a revised standard consistent with Commission policy.

698. In Order No. 890, the Commission affirmed reliance on the NAESB process to develop business practices implementing the Commission's

[8] Standards for Business Practices and Communication Protocols for Public Utilities, Order No. 676, 71 FR 26199 (May 4, 2006), FERC Stats. & Regs. ¶ 31,216 (2006), reh'g denied, Order No. 676-A, 116 FERC ¶ 61,255 (2006), order on reh'g, Order No. 676-B, 72 FR 21095 (Apr. 30, 2007), FERC Stats. & Regs. ¶ 31,246 (2007).

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redirect policy. The Commission also determined that the reforms adopted in Order No. 676, in combination with the OATT-related reforms adopted in this proceeding, were adequate to ensure that transmission providers do not engage in undue discrimination when a customer seeks to modify its receipt and delivery points on a firm basis. With respect to the effect of redirects on rollover rights, the Commission affirmed its policy allowing a redirect of firm, long-term service to retain rollover rights, even if the redirect is requested for a shorter period. The Commission concluded that a transmission customer should not have to choose between maintaining its rollover rights and redirecting on a firm basis. The Commission noted, however, that any change to a delivery point would be treated as a new request for service for purposes of determining availability of capacity. As a result, a redirect right does not grant the customer access to system capacity or queue position different from other customers submitting new requests for service. The Commission also provided guidance regarding the processing of, and pricing for, redirected service.

Commission Determination

704. The Commission denies petitioners' requests to amend the rights of rollover customers to redirect their service. Under section 22.2 of the pro forma OATT, a request for a firm redirect must be treated like a request for new transmission service.[9] As a new request for service, each redirect request is subject to the availability of capacity and subject to the possibility that the transmission provider may not be able to provide rollover rights on the new redirected path. The transmission provider is required to offer rollover rights to a customer requesting a firm redirect only if rollover rights are available on the redirected path, i.e., to the extent not restricted based on reasonable forecasts of native load growth or preexisting contracts that commence in the future.[10]

705. As the Commission explained in Order No. 890, rollover rights follow the redirect regardless of the duration of the redirect.[11] A transmission customer making a firm redirect request does not convert its original long-term firm transmission service agreement into two short-term service agreements, nor does it lose its rollover rights under its long-term firm

[9] See Order No. 890 at P 1268.
[10] See Order No. 676 at P 51.
[11] Order No. 890 at P 1280.

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transmission service agreement.[12] At the same time, a customer can exercise its rollover right only at the end of the contract. Thus, if a customer with rollover rights chooses to redirect its capacity for less than the full remaining term of the contract, absent some further request to redirect, the original path will automatically be reinstated and rollover rights would remain on only the original path. By contrast, if the customer chooses to redirect its capacity until the end of its contract, the customer would have rollover rights along only the redirected path, and only to the extent not restricted based on native load growth or future contracts along the redirected path.

706. We therefore reject requests to restrict rollover rights to longer-term redirects. A long-term transmission customer may request multiple, successive redirects for firm service. This discretion is limited by the fact that each successive request is treated as a new request for service in accordance with section 17 of the pro forma OATT. Each request is therefore subject to the availability of capacity and subject to the possibility that the transmission provider may not be able to provide

rights on the new, redirected path.[13] If the customer has not been granted rollover rights for a redirect that extends to the end of its contract, the redirected service will terminate on the same date as the parent service.

707. We also reiterate that a customer cannot exercise any rollover rights unless it first has provided the appropriate notice to the transmission provider. If a customer requests and is granted a rollover right prior to the relevant notice deadline (60 days for pre-Order No. 890 agreements or one year for all others) and subsequently requests and is granted a redirect for firm service for the remainder of the contract term (i.e., within the notice period), the new reservation governs the rights at the new

[12] Id.; see also Commonwealth Edison Co., 95 FERC ¶ 61,027 at 61,083 (2001) (explaining that a request to change delivery points on a firm basis for one month, followed by a reversion to the original points does not convert the existing long-term firm agreement into two separate short-term agreements); American Electric Power Service Corp., 97 FERC ¶ 61,207 at 61,905-06 (2001).

[13] For example, assume a transmission customer with a five-year agreement for firm service between points A and B, who qualifies for rollover rights on that path. If the transmission customer seeks to redirect on a firm basis in year 3 to points C to D and then redirect back to points A and B thereafter, at the end of the five year agreement the transmission customer would have rollover rights only with respect to points A to B. If, however, the transmission customer seeks to redirect to points C and D for the last six months of the contract term and both qualifies for rollover rights on this path and has requested rollover within the notice period of the contract, the customer would then have rollover rights only with respect to points C and D. See Order No. 676 at P 59.

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receipt and delivery points and the customer can obtain rollover rights with respect to the redirected capacity to the extent rollover rights are available for the redirected points. If, however, a customer fails to request a rollover right prior to the relevant notice deadline, the customer forfeits rollover rights along the current or any redirected path.

708. We clarify, to the extent necessary, that transfer capability is not freed up for earlier queued service requests until a redirect has been granted. A redirect request must be evaluated in accordance with section 17 of the pro forma OATT using the same system assumptions and analysis applicable to any other new request for service, including whether sufficient ATC exists to accommodate the request.[14] If there is insufficient ATC to offer service to customers in the queue, and an existing customer requests redirected service, any increase in ATC along the original path is contingent upon the acceptance and confirmation of the redirect. It cannot be assumed at the time of a redirect request that the transmission provider will grant the request.

At the November 4th meeting of the WEQ EC, it was determined that an EC Task Force with the purpose of holding discussion with with FERC Staff regarding remaining questions on the Commission Rollover of Redirect policies. The EC Task Force held a teleconference with FERC Staff on January 8, 2009. In addition to responding verbally to question raised by the EC Task Force, FERC Staff also provided written guidance.

Written guidance provided by FERC Staff prior to the teleconference:

Redirects and Rollover Rights:
FERC Staff's Interpretation of the OATT

1. *Eligibility for rollover rights follows the redirect if the redirect is for the remaining term of the contract (i.e., not paired with a redirect back to the original path), although the transmission provider may restrict rollover rights on the redirected path if necessary to serve reasonably forecasted native load growth or preexisting contracts that commence in the future. See Order No. 890 at P 1280, 1286; Order No. 890-A at P 705; Order No. 676 at P 51, 57-59.*

2. *Renewal on a particular path does not limit the customer's rights associated with subsequent redirects. See Order No. 890-A at P 707.*

[14] Order No. 890 at P 1285.

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3. *Failure to renew a reservation by the renewal deadline date waives all rollover rights for the reservation. See Order No. 890-A at P 707.*

4. *Partial renewal reduces the eligibility for rollover rights to the amount renewed. Cf. Order No. 890-A at P 707.*

5. *Restrictions on rollover rights stated in a service agreement do not follow a redirect. See Order No. 676 at P 51, 59; Order No. 890-A at P 704, 706.*

6. *Granting rollover rights on a redirected path does not affect the ability of the customer to redirect, subject to availability, back to the original or another path. See Order No. 676 at P 59.*

Written guidance provided by FERC Staff after the teleconference:

Rae –

Following up on our call yesterday, we have the following to offer regarding Ed's hypothetical of a partial quantity redirect of a 100 MW reservation with rollover rights of 60 MW on the parent reservation. We are of the opinion that a customer should be eligible to receive up to 100 MW of rollover rights for that reservation if it redirected, subject to availability on the redirect path.

Consistent with the above, if the customer redirected 50 MW to a new path for the remainder of the contract term, and retained 50 MW on the parent path, the customer would have 50 MW of rollover rights on the parent path and, subject to availability, up to 50 MW of rollover rights on the redirected path. The amount of rollover rights available on the parent path would be within the original limitation stated in the service agreement, and the amount of rollover rights on the redirected path would not be restricted by that limitation (although a separate limitation may apply depending on the results of the transmission provider's study). The aggregate rollover rights would be 100 MW, equal to the amount for which the customer is eligible under the contract. That is, a customer signing, and paying for, a contract for 100 MW of the appropriate length is eligible to receive 100 MW of rollover rights for that contract. The only reason those rights were limited for the parent path is because capacity was not available on that path. If capacity is available on an alternative path, the customer should be entitled to receive rollover rights up to the amount associated with its contract.

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Similarly, if the customer redirected 30 MW to a new path for the remainder of the contract term, and retained 70 MW on the parent path, the customer would still have only 60 MW of rollover rights on the parent reservation and, subject to availability, up to 30 MW on the redirected path. The aggregate rollover rights would be up to 90 MW, less than the amount for which the customer is eligible due to the restriction stated in the contract.

Please forward this as appropriate to the participants on yesterday's call. Thanks again for the opportunity to consider and discuss the issues the EC is working through, and let us know if there's anything else we can do to be of assistance.

Mason

b. Description of Recommendation:

c. Business Purpose:

Implementation of FERC Orders.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):
The following commentary/rationale is provided to aid in understanding this first draft of the recommended standard proposed by OATI:

001-9.7: FERC declined to adopt 9.7 and asked NAESB to reconsider FERC policy with respect to conveyance of rollover rights. Hence, this standard recommendation.

001-9.7.1: This standard and its subordinate standards 9.7.1.1-9.7.1.5 are proposed to clearly identify when a customer wishes to convey rollover. The Commission's Orders actually have less flexibility than proposed in the recommendation in that they do not envision an option to retain rollover regardless of redirect. One could read the "guidance" that if I redirect on firm basis to end of term of long-term reservation it ALWAYS conveys rollover – assuming they are not limited. 9.7.1 and subordinate standards specify exactly what must be submitted – it's a long-term (aka YEARLY) Redirect, submitted prior to renewal deadliine (after that you have no rights to rollover), and must

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match end of term of service. The only "gotcha" is that it will be a "YEARLY" service that could be for one-day (the last day) of service submitted 60 (or 1 year) in advance. FERC has been very clear that making a shorter duration (aka MONTHLY) redirect does NOT change the fundamental long-term nature of the rights ot the original. They have reaffirmed this policy addressing TranServ comments with respect to resale of a conditional firm weekly service – I read this as clearly in physical rights situations, the rights purchased govern, not how they may later be remarketed, redirected, etc. So lets let them submit a long-term service and ignore timing if it's a REDIRECT. This is REALLY great when we look at OASIS Implementation Guide on RENEWAL. As written, if I submit a renewal against MONTHLY, most would invalidate it out of hand. So, you have a REDIRECT that's YEARLY for one day – and RENEWAL is okay as it starts on parent stop, service is same, etc.

Now, we COULD limit the minimum term of the redirect to MONTHLY as that is the only example the Commission (Staff) made – there "guidance" was a less then yearly, monthly request that still conferred rollover.

001-9.7.1.5: This is a catchall for things like trying to redirect more MWs or outside of start/stop of parent, that are already prohibited by the rest of the 001-9 standards.

001-9.7.2: This clarifies that if you don't qualtify under 9.7.1, you get no rollover – that means long-term redirects in "mid-stream" are no better than short-term firm redirects that end conincident with the long-term service.

001-9.7.3: These requests get no special treatment with respect to the queue of LONG-TERM requests for service with rollover. Another justification that even though the "term" of the request doesn't qualify as "long-term", the treatment in the queue does set its priority relative to others that are also seeking long-term service with rollover.

001-9.7.4: Specifically suggest that when releasing the rollover rights of parent, consider that only release to the most restrictive limit. If I hold a limited right to renew 100 MWs on an original request for 200 MWs and I redirect 100 MWs that is accepted with rollover, I did not drop my orignal path rollover to 0, but to the lower of 200 -100 =100 or limited rollover = 100, which means as customer I am not unduly harmed by my decision to move to another path. I am paying the full boat on both paths, so I don't see an equity issue here.

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Additional Background documentation

- 2006 WEQ Annual Plan Item (3)(a)(x) Recommendation, which was remanded back to the subcommittee by the Executive Committee at the August 14-15, 2006 meeting.
- Standards Request R07004 Business practice and technical standards for assigning, tracking, and limiting rollover rights
- Rollover of Redirects Motions 2009
- Rollover of Redirects Core Concepts 2009
- February 4-5, 2009 (unavailable - DC)
- February 18, 2009 (unavailable – DC)
- March 4, 2009 (unavailable – DC)
- March 17-19, 2009 (unavailable – DC)
- April 7-9, 2009 (unavailable – DC)

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **WEQ BPS Subcommittee**
Request No.: **WEQ 2009 AP Item (6.a.2) R08004**
Request Title: **WEQ-011 Consistency Changes to include: Introduction and Applicability sections.**

1. RECOMMENDED ACTION:

__X__Accept as requested
___Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

__X__Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
__X Modification	_____X__Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

Standards Request (R08004) was submited to provide consistency across business practices such that all business practice standards have the following sections in the following order:

- Introduction
- Applicability
- Definition of Terms
- Business Practice Requirements

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**WEQ BPS Subcommittee**
Request No.:	**WEQ 2009 AP Item (6.a.2) R08004**
Request Title:	**WEQ-011 Consistency Changes to include: Introduction and Applicability sections.**

RECOMMENDED STANDARDS:

Changes to WEQ-011 Gas / Electric Coordination will be added above the Definition of Terms similar to what is done in WEQ-005 and WEQ-008.

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Gas / Electric Coordination

Introduction

This standard was developed jointly by the WEQ and WGQ with the purpose to improve coordination between the Gas and Electric industries in order to improve daily operational communications between pipelines and gas fired power plants.

Communications standards include anticipated power generation fuel requirements for the upcoming day as well as for any operating problems that might hinder gas fired power plants from receiving required contractual quantities when needed.

Applicability

This business practice applies to both the WEQ and WGQ specifically Balancing Authorities (BA), Power Plant Operators (PPO), and Transportation Service Providers.

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4. SUPPORTING DOCUMENTATION

a. Description of Request:

Add an Introduction and an Applicability section to WEQ 011 Gas / Electric Coordination Business Practice.

b. Description of Recommendation:

The proposed changes to this business practice will provide consistency across business practices such that all business practices have the following sections in the following order:

- Introduction
- Applicability
- Definition of Terms
- Business Practice Requirements

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters:	**WEQ BPS Subcommittee**
Request No.:	**WEQ 2009 AP Item (6.a.2) R08004**
Request Title:	**WEQ-011 Consistency Changes to include: Introduction and Applicability sections.**

c. Business Purpose:

To provide format consistency across business practices

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

The BPS has agreed that changes to WEQ-011 indicated above are necessary and recommend approval to do so.

WEQ Business Practices Meeting Minutes

- January 12, 2009 http://www.naesb.org/pdf4/weq_bps011209fm.doc
- April 13, 2009 (unavailable – DC)

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Standards Request R08004

- http://www.naesb.org/pdf3/r08004.doc

MidwestISO
Energizing the Heartland

FORMAL COMMENTS

Quadrant:	Wholesale Electric Quadrant
Recommendation:	WEQ 2009 AP Item (6.a.2) R08004 "WEQ-011 Consistency Changes to Include: Introduction and Applicability Sections"
Submitted By:	Ed Skiba
Date:	May 4, 2009

Midwest ISO would like to offer the following comment for consideration by the Executive Committee prior to taking action on the recommendation WEQ 2009 AP Item (6.a.2) R08004 "WEQ-011 Consistency Changes to Include: Introduction and Applicability Sections."

The Applicability section should be expanded to include Regional Transmission Operators, Independent System Operators, and Reliability Coordinators. (See redline below.) In addition to the entities listed in the recommendation, the Regional Transmission Organizations and Independent System Operators have requirements assigned to them under sections 011-1.4 and 011-1.6. In Section 011-1.5 the Power Plant Operator is expected to send information to the Reliability Coordinator, and the Regional Reliability Coordinator is expected to establish written procedures with the appropriate gas Transportation Service Provider(s) and/or Power Plant Operator(s) under section 011-1.6.

Applicability

This business practice applies to both the WEQ and WGQ specifically Balancing Authorities (BA), Power Plant Operators (PPO), Regional Transmission Organizations, Independent System Operators, Reliability Coordinators, and Transportation Service Providers.

RECOMMENDATION
AS REVISED AT THE FEBRUARY 3, 2009 WEQ EXECUTIVE COMMITTEE MEETING FOR CONSIDERATION

For Quadrant: **WEQ**

Requesters: **WEQ BPS Subcommittee**
Request No.: **2008 WEQ AP Item 6.b**
Request Title: **Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)**

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Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 693, specifically those dealing with time error and inadvertent interchange payback, our subcommittee has accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittee understands that NERC is considering the elimination of Time Error Corrections, and that the proposed standards may be unnecessary if NERC should identify that course of action.. However, at this time, whether that path will be chosen is uncertain. In light of this, the subcommittee believes it is prudent to present this standard for consideration. Should NERC choose to eliminate Time Error Correction, it may be appropriate for this Business Practice to be retired.

The subcommittee also understands that the proposed standards include references to NERC reliability standards related to Inadvertent Payback that are currently under revision. The subcommittee does not expect that this recommendation will require significant rework by the subcommittee once NERC adopts its related reliability standards.

The subcommittee's chairs along with the chair of the Time and Inadvertent Management Task Force will review the final NERC actions and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has not determined if or when they would eliminate of Time Error Corrections.
(2) The tools developed by the business practice support balancing authorities compliance to the existing NERC standards.
(3) Allowing the business practices to undergo a field test will provide signals to the NERC and NAESB drafting teams that they are on the right track.
(4) Submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to further coordinate with NERC.

Please note that the subcommittee and its Time and Inadvertent Management Task Force have worked diligently on this recommendation and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Jim Busbin, Co-Chair, NAESB Business Practices Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee

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RECOMMENDATION
AS REVISED AT THE FEBRUARY 3, 2009 WEQ EXECUTIVE COMMITTEE MEETING FOR CONSIDERATION

For Quadrant: **WEQ**

Requesters: **WEQ BPS Subcommittee**
Request No.: **2008 WEQ AP Item 6.b**
Request Title: **Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)**

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1. RECOMMENDED ACTION:

____	Accept as requested
X	Accept as modified below
____	Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

X	Change to Existing Practice
____	Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
____ Initiation	____ Initiation
X Modification	X Modification
____ Interpretation	____ Interpretation
____ Withdrawal	____ Withdrawal
____ Principle	____ Principle
____ Definition	____ Definition
____ Business Practice Standard	____ Business Practice Standard
____ Document	____ Document
____ Data Element	____ Data Element
____ Code Value	____ Code Value
____ X12 Implementation Guide	____ X12 Implementation Guide
____ Business Process Documentation	____ Business Process Documentation

3. RECOMMENDATION

SUMMARY:

Standards Request R07020 was submitted to have NAESB develop additional time error correction and indavertent payback options. At the June 4, 2008 BPS meeting Time and Inadvertent Management Task Force was created to address R07020. The Task Force met on three separate occassions on created:

- Time Error Correction Inititiation (Method 2) for WEQ-006
- Bilateral Payback (Method 2) for WEQ-007
- Unilateral Payback (Method 2) for WEQ-007

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RECOMMENDED STANDARDS:

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RECOMMENDATION
AS REVISED AT THE FEBRUARY 3, 2009 WEQ EXECUTIVE COMMITTEE MEETING FOR CONSIDERATION

For Quadrant: WEQ

Requesters: WEQ BPS Subcommittee
Request No.: 2008 WEQ AP Item 6.b
Request Title: Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)

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Changes to WEQ-006

Purpose

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Interconnection frequency is normally scheduled at 60.00 Hz and controlled to that value. The control is imperfect and over time the frequency will average slightly above or below 60.00 Hz resulting in electromechanical clocks developing an error relative to true time. This Standard specifies the procedures to be used for reducing the error to within acceptable limits of true time. Except where specifically identified, the following practices do not pertain to the Western Interconnect.

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Deleted: **Balancing Authority Area (BAA)** - An electrical system bounded by interconnection (tie-line) metering and telemetry, where the Balancing Authority controls (either directly or by contract) generation to maintain its Interchange Schedule with other Balancing Authority Areas and contributes to frequency regulation of the Interconnection.

006-0.2 RESERVED

006-4 **TIME ERROR CORRECTION INITIATION (METHOD 1)**

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Time Error Corrections should start and end on the hour or half-hour, and notice should be given at least one hour before the Time Error Correction is to start or stop. Time Error Corrections shall last at least one hour, unless terminated by a Reliability Coordinator. Time Error Corrections for fast time shall not be initiated between 0400-1100 Central Time except in the Western Interconnection. All Balancing Authorities within an Interconnection shall make all Time Error Corrections directed by the Interconnection Time Monitor for its Interconnection. All Balancing Authorities within an Interconnection shall make Time Error Corrections at the same rate. Each Interconnection Time Monitor shall monitor Time Error and make a reasonable effort to initiate or terminate corrective action orders according to the following table:

Time Error (seconds)	Initiation		Termination		Maximum Offset (1)
	East	West	West	East	
Slow	–10	-5	±0.5	–6	+0.02 Hz
Fast	+10	+5	±0.5	+6	-0.02 Hz

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(1) Pending a successful Time and Inadvertent Management field trial and subsequent reliability standard approvals, the Interconnection Time Monitor shall have the discretion to choose any increment of offset frequency , up to and including the Maximum Offset frequency, deemed necessary to effect Time Error Correction.

RECOMMENDATION
AS REVISED AT THE FEBRUARY 3, 2009 WEQ EXECUTIVE COMMITTEE MEETING FOR CONSIDERATION

For Quadrant: WEQ

Requesters: WEQ BPS Subcommittee
Request No.: 2008 WEQ AP Item 6.b
Request Title: Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)

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006-5 TIME ERROR CORRECTION INITIATION (METHOD 2)

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The Interconnection Time Monitor may choose Method 2 to reduce the number of Time Error Corrections. If Time Error is beyond +30 seconds at 22:00 Central Prevailing Time, the Interconnection Time Monitor will initiate a 24 hour correction starting at 00:00. The Interconnection Time Monitor shall make a reasonable effort to initiate or terminate corrective action orders according to the following table:

Time Error (seconds)	*Initiation*	*Termination*	*Maximum Offset* (1)
Slow	-30 @ 22:00 to start at 00:00	00:00 next day	+0.02 Hz
Fast	+30 @ 22:00 to start at 00:00	00:00 next day	-0.02 Hz

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¶
Time (seconds) ... [1]

006-7 TIME ERROR CORRECTION OFFSET

Each Balancing Authority, when requested, shall participate in a Time Error Correction by one of the following two methods:

006-8 INTERCONNECTION TIME ERROR NOTIFICATION

On the first day of each month, the Interconnection Time Monitor shall issue a notification of Time Error accurate to within 0.01 second to all Reliability Coordinators within the Interconnection to assure uniform calibration of time standards.

006-9 WESTERN INTERCONNECTION TIME ERROR NOTIFICATION

Within the Western Interconnection, the Interconnection Time Monitor shall provide the accumulated Time Error (accurate to within 0.001 second) to all Balancing Authorities on a daily basis at 1400 PDT/PST using the WECCNet. The alphabetic designator shall accompany Time Error notification if a Time Error Correction is in progress.

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(1) Pending a successful Time and Inadvertent Management field trial and subsequent reliability standard approvals, the Interconnection Time Monitor shall have the discretion to choose any increment of offset frequency , up to and including the Maximum Offset frequency, deemed necessary to effect Time Error Correction.

RECOMMENDATION
AS REVISED AT THE FEBRUARY 3, 2009 WEQ EXECUTIVE COMMITTEE MEETING FOR CONSIDERATION

For Quadrant: **WEQ**

Requesters: **WEQ BPS Subcommittee**
Request No.: **2008 WEQ AP Item 6.b**
Request Title: **Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)**

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006-10 After the premature termination of a manual Time Error Correction, a slow Time Error Correction can be reinstated after the frequency has returned to 60.00 Hz or above for a period of ten minutes. A fast Time Error Correction can be reinitiated after the frequency has returned to 60.00 Hz or lower for a period of ten minutes. At least one hour shall elapse between the termination and re-initiation notices.

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006-11 **TIME ERROR CORRECTION ON RECONNECTION**

When one or more Balancing Authorities have been separated from the Interconnection, upon reconnection, they shall adjust their Time Error devices to coincide with the Time Error of the Interconnection Time Monitor. The Balancing Authorities shall notify the Interconnection Time Monitor they are ready to receive the necessary adjustment to Time Error as soon as possible after reconnection.

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Changes to WEQ-007

Purpose

Except where specifically identified, the following practices do not pertain to the Western Interconnect.

007-1.1.1 **Bilateral Payback (Method 1)**

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Inadvertent Interchange accumulations may be paid back via an Interchange Schedule with another Balancing Authority.

007-1.1.1.1 Opposite Balances

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The source Balancing Authority Area and sink Balancing Authority Area should have Inadvertent Interchange accumulations in the opposite direction, unless transferring inadvertent to another party to facilitate the reduction of inadvertent balances.

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007-1.1.1.2 Payback Terms

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The terms of the Inadvertent Interchange payback shall be agreed upon by all involved Balancing Authorities and Transmission Service Providers.

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RECOMMENDATION
AS REVISED AT THE FEBRUARY 3, 2009 WEQ EXECUTIVE COMMITTEE MEETING FOR CONSIDERATION

For Quadrant: **WEQ**

Requesters: **WEQ BPS Subcommittee**
Request No.: **2008 WEQ AP Item 6.b**
Request Title: **Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)**

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007-1.1.2 Bilateral Payback (Method 2)

Balancing Authorities may choose to financially settle part or all of their Inadvertent Interchange accumulations.

007-1.1.2.1 Opposite Balances

The source Balancing Authority Area and sink Balancing Authority Area should have Inadvertent Interchange accumulations in the opposite direction, unless transferring inadvertent to another party to facilitate the reduction of inadvertent balances.

007-1.1.2.2 Payback Terms

The terms of the Inadvertent Interchange payback shall be agreed upon by the settling Balancing Authorities.

007-1.1.2.3 Accounting and Reporting

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The settling transaction in a given month will be accounted for as an after-the-fact schedule in the last on-peak hour of the month for on-peak Inadvertent Interchange and the last off-peak hour of the month for off-peak Inadvertent Interchange. The Balancing Authorities will jointly report to NERC the settled on-peak and off-peak MWh.

007-1.1.3 Unilateral Payback (Method 1)

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Inadvertent Interchange accumulations may be paid back unilaterally controlling to a target of non-zero ACE. Controlling to a non-zero ACE ensures that the unilateral payback is accounted for in the CPS calculations. The unilateral payback control offset is limited to Balancing Authority's L_{10} limit and shall not burden the Interconnection.

007-1.1.4 Unilateral Payback (Method 2)

Method 2 may only be utilized whenever the Balancing Authority's Inadvertent Interchange Balance and Time Error have the same sign. Method 2 unilateral Inadvertent payback must end if a Time Error Correction is initiated. Payback Method 2 may be accomplished by either of the following methods:

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RECOMMENDATION
AS REVISED AT THE FEBRUARY 3, 2009 WEQ EXECUTIVE COMMITTEE MEETING FOR CONSIDERATION

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For Quadrant: **WEQ**

Requesters: **WEQ BPS Subcommittee**
Request No.: **2008 WEQ AP Item 6.b**
Request Title: **Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)**

007-1.1.4.1 An offset of scheduled frequency of +0.02 Hz. in the ACE equation used for control (but not NERC reporting). This will result in a non-zero reporting ACE. A non-zero ACE ensures that the unilateral payback is accounted for in the CPS calculations.

007-1.1.4.2 An offset of the Net Interchange Scheduled value of the control ACE equation (but not NERC reporting ACE) of 5MW or 20% of the Balancing Authority Bias, whichever is greater. This will result in a non-zero reporting ACE. A non-zero ACE ensures that the unilateral payback is accounted for in the CPS calculations.

007-2 **OTHER PAYBACK METHODS**
Upon agreement by all Regions within an Interconnection, other methods of Inadvertent Interchange payback may be utilized.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

The purpose of this standard is to provide time correction and inadvertent interchange management business practices that will help NERC address the concerns raised by the FERC (*Mandatory Reliability Standards for the Bulk-Power System Docket No. RM06-16-000; Order No. 693).*

- Specifically, this Business Practice would address concerns raised in the sections of the order dealing with BAL-004, BAL-005 and BAL-006:Number of frequency excursions. Over 40% of the identified frequency excursions happened during Time Error Corrections (TEC), where the TEC magnifies the deviation from 60Hz. This business practice would result in fewer hours in TEC, which should result in fewer frequency excursions.
- BAL-004: Number and efficiency of TEC. Performing a clock-day TEC will reduce confusion about start and stop times and would enable a simple measurement on the efficiency of each correction.
- BAL-006: Accumulation of large Inadvertent balances. This business practice provides two additional tools to allow Balancing Authorities to pay back or recover Inadvertent Interchange. The unilateral payback option will also result in fewer TECs.

The scope of the proposed practices is intended to be very focused.

Time Error Correction Practices

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RECOMMENDATION
AS REVISED AT THE FEBRUARY 3, 2009 WEQ EXECUTIVE COMMITTEE MEETING FOR CONSIDERATION

For Quadrant: **WEQ**

Requesters: **WEQ BPS Subcommittee**
Request No.: **2008 WEQ AP Item 6.b**
Request Title: **Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)**

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First, the practices would accommodate and have no impact on the Western Interconnection's Automatic Time Error Correction (WATEC) procedure for the Western Interconnection.

The practices would still allow current manual TEC practices and would also allow an alternate manual TEC procedure. The alternate procedure would expand the time window and reduce the frequency offset such that TECs are implemented if Time Error exceeds ± 30 seconds (East) at 22:00 Central Prevailing Time. If this threshold is reached, a TEC is implemented at midnight (2 hours later) with a scheduled frequency offset of ±0.02Hz and run for a full clock day (unless stopped for reliability reasons).

Inadvertent Management

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There are two components to the Inadvertent Management practices.

Unilateral Payback Correcting Time Error: In addition to current procedures, allow unilateral payback via one of the following two methods whenever the BA Inadvertent Interchange Balance and Time Error have the same sign:

- An offset of scheduled frequency of ±0.02 Hz, or
- If the scheduled frequency setting cannot be offset, a Net Interchange Schedule (MW) equal to 5MW or 20% of the BA Bias (whichever is greater).

This unilateral Inadvertent payback ends when the time error is zero or has changed signs, the accumulation of inadvertent interchange has been corrected to zero, or a scheduled time error correction begins, which takes precedence over offsetting frequency schedule to pay back inadvertent.

Financial Settlement: Allowing financial settlement of Inadvertent Interchange prevents a second flow of energy to correct an unscheduled flow of energy in previous hours. The terms of the financial inadvertent settlement remain private, the parties and amount of Inadvertent Interchange would be reported to NERC.

Terms and mechanisms for settlement of Inadvertent Interchange are not part of the scope of this proposal.

b. Description of Recommendation:

See proposed standards changes listed under Section 3 Recommended Standards.

c. Business Purpose:

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RECOMMENDATION
AS REVISED AT THE FEBRUARY 3, 2009 WEQ EXECUTIVE COMMITTEE MEETING FOR CONSIDERATION

For Quadrant: **WEQ**

Requesters: **WEQ BPS Subcommittee**
Request No.: **2008 WEQ AP Item 6.b**
Request Title: **Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020)**

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Develop a NAESB Time and Inadvertent Management Business Practice that provides additional Inadvertent Payback options and improved Time Control.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Notes:

- The changes to WEQ-006 are based on the assumption that the WEQ membership has ratified 2008 WEQ Annual Plan Item 6.a Review/revise WEQ 006 to remove/revise mandatory requirements for Interconnection Time Monitor (R07019)

Supporting Documentation:

- R07020 Time and Inadvertent Management Business Practice
- Time and Inadvertent Management Business Practice Presentation, provided to the Business Practices Subcommittee June 4, 2008
- Time and Inadvertent Management Business Practices FAQ, dated August 16, 2008
- Time and Inadvertent Management Business Practices Implementation Plan (Best Case) dated September 19, 2008
- Meeting Minutes
  - BPS June 4, 2008
  - BPS July 29, 2008
  - BPS September 22, 2008
  - Time and Inadvertent Management Task Force July 14, 2008 (Draft Minutes)
  - Time and Inadvertent Management Task Force July 24, 2008 (Draft Minutes)
  - Time and Inadvertent Management Task Force August 15, 2008 NAESB to add link

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Each Interconnection Time Monitor shall monitor time error and make a reasonable effort to initiate or terminate corrective action orders according to the following table:

Time (seconds)	*Initiation*		*Termination*	
	East	West	East	West
Slow	–10	-5	–6	±0.5
Fast	+10	+5	+6	±0.5

To: NAESB Wholesale Electric Quadrant Executive Committee

From: The Joint Interchange Scheduling Working Group (JISWG), Submitted by R. Harshbarger, Puget Sound Energy

Re: Minor Correction

Date: February 2, 2009

Following is a draft of the four instances where the e-Tag specification is mentioned. The WEQ-001 item needs discussion.

WEQ 001-10.8:

TPs shall have the right, but are in no means obligated, to accept requests for Redirect on a Non-Firm basis based on the submission of an Electronic Tag (e-Tag) using protocols compliant with Version 1.7.095 NERC Transaction Information System Working Group (TISWG) *Electronic Tagging Functional Specification*.

[the implementation of e-Tag 1.8 included the removal Next Hour Service from the Electronic Tagging Functional Specification – this is a problem]

WEQ 004-2:

Until other means are adopted by NAESB, the primary method of submitting the Request For Interchange (RFI) to the Interchange Authority shall be an e-Tag using protocols compliant with the *Electronic Tagging Functional Specification, Version 1.8*.

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WEQ 004-A Appendix A – Electronic Tagging Service Performance Requirements and Failure Procedures, B. Failure Procedures:

Interchange Authority Service Entity – The entity that provides the Interchange Authority service for an e-Tag. The Interchange Authority service itself is typically a computer system that maintains the master database for the tag and communicates status with other computer systems. The Interchange Authority Service Entity is the utility industry entity that is responsible for providing the service. In the Electric Industry Registry, this entity's URL is specified by the Sink Balancing Authority.

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WEQ 008-0.20:

Interchange Transaction Tag (Tag) – An Interchange Transaction being submitted for implementation according to the *Electronic Tagging Functional Specification, Version 1.8*.

Deleted: NERC "Electronic Tagging Functional Specification", version 1.7.095

TO: NAESB Wholesale Electric Quadrant Executive Committee

FROM: Denise Rager, NAESB Staff

RE: Minor Correction to NAESB WEQ Business Practice Standards, Version 002.0

DATE: February 27, 2009

After reviewing the WEQ-003-0 data dictionary element definition for "SYSTEM_ATTRIBUTE", it was determined a publication error had occurred during the application of Final Action 2008 WEQ Annual Plan Item 2.a.i.4, 2.b.v.4, 2.b.v.5, (link http://www.naesb.org/member_login_form.asp?doc=fa_2008_weq_api_2ai4_2bv4_2bv5.doc) which was ratified by the WEQ membership on July 23, 2008 for SYSTEM_FORECASTED_LOAD.

The following minor correction should be applied to NAESB WEQ Business Practice Standards, version 002.0 (WEQ-003-0) OASIS Data Dictionary, version 1.5:

Data Dictionary Element Name: SYSTEM_ATTRIBUTE

Definition of Data Element (Redline):

SYSTEM_FORECASTED_LOAD – Anticipated Forecasted Daily System-Wide Peak Load

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Definition of Data Element (Clean):

SYSTEM_FORECASTED_LOAD – Anticipated Forecasted Daily System-Wide Peak Load

MidwestISO
Energizing the Heartland

Minor Correction Request

Quadrant:	Wholesale Electric Quadrant (WEQ)
Business Practice:	Remove Content of WEQ001-1.5 through WEQ001-1.8
Submitted By:	Ed Skiba
Date:	March 3, 2009

Midwest ISO is requesting that the WEQ Executive Committee delete the content of WEQ001-1.5 through WEQ001-1.8 as a minor correction. We believe deleting these sections meets the criteria of a minor correction based upon FERC actions and prior actions taken by the WEQ Executive Committee.

According to the NASB Operating Practices Minor Corrections include:

(a) clarifications or corrections made by a regulatory agency to standards that are of a jurisdictional nature, or by the American National Standards Institute or its successor;
(b) clarifications or corrections to the format, appearance, or descriptions of standards in standards documentation;
(c) clarifications or corrections to add code values to tables; and
(d) clarifications and corrections that do not materially change a standard.

Background FERC Actions:

On May 9, 2005, the Commission issued its Notice of Proposed Rulemaking (NOPR) R05-005-000 Standards for Business Practices and Commission Protocols for Public Utilities. Paragraph 25 states:

With the exception of standards, discussed below, involving standards that duplicate the requirements in our regulations (OASIS Business Practice Standard 1, including Standards 1.1 through 1.8, and in the Definitions of "Affiliate," "Responsible party," "Reseller," "Transmission Provider," "Transmission Customer," and "Wholesale merchant function"), we believe that the WEQ's OASIS Business Practice Standards are consistent with the Commission's existing standards on this topic.[1]

On April 26, 2005, the Commission issued Order Number 676 incorporating by reference the WEQ NAESB Business Practices Version 0. This Final Rule did not incorporate WEQ001-1.5 through WEQ001-18 as documented in paragraph 19:

The specific standards developed by the WEQ that we are incorporating by reference in this Final Rule are as follows:

Business Practices for Open Access Same-Time Information Systems (OASIS) (WEQ-001, Version 000, January 15, 2005, with minor corrections applied on March 25, 2005, and additional numbering added October 3, 2005) including Standards 001-0.2 through 001-0.8, 001-2.0 through 001-9.6.2, 001-9.8 through 001-10.8.6, and Examples 001-8.3-A, 001-9.2-A, 001-10.2-A, 001-9.3-

[1] In addition, although we are proposing to incorporate by reference OASIS Business Practice Standard 10.6, we have problems with this provision that we are asking commenters to address in their comments on this NOPR.

MidwestISO
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A, 001-10.3-A, 001-9.4.1-A, 001-10.4.1-A, 001-9.4.2-A, 001-10.4.2-A, 001-9.5-A, 001-10.5-A, 001-9.5.1-A, and 001-10.5.1-A;

On July 21, 2008, the Commission issued Order Number 676-C incorporating by reference the WEQ NAESB Business Practices Version 1. This Final Rule also did not incorporate WEQ001-1.5 through WEQ001-18 as documented in paragraph 9:

The specific NAESB standards that we are incorporating by reference in this Final Rule are:

Business Practices for Open Access Same-Time Information Systems (OASIS), Version 1.4 (WEQ-001, Version 001, Oct. 31, 2007, with minor corrections applied on Nov. 16, 2007) including Standards 001-0.2 through 001-0.8, 001-0.14 through 001-0.20, 001-2.0 through 001-9.6.2, 001-9.8 through 001-12.5.2, and 001-A and 001-B; [2]

Background WEQ Executive Committee Actions:

On October 15, 2007, the WEQ Executive Committee met via conference call and determine the change to remove all of WEQ009 could be done under a minor correction citing Order 676 where the Commission determined they would not include WEQ009 in the Final Rule "because they duplicate the Commission's regulation on this subject" as noted in paragraph 72. The "Minor Correction to NAESB WEQ-009 Standards of Conduct" dated October17, 2007, provides additional detail on the WEQ Executive Committee's action http://www.naesb.org/pdf3/weq_mc101707weq009.doc.

Summary:

Based on the references cited above, removing the content of WEQ 001-1.5 through WEQ 001-1.8 meets the criteria for a minor correction based on precedence established by the WEQ Executive Committee in 2007. With this minor correction we are requesting that the WEQ Executive Committee take a similar action on the WEQ 001-1.5 through WEQ 001-1.8 requirements as it did with the WEQ 009 requirements which were not incorporated in either FERC Orders 676 or 676-C.

[2] The WEQ Version 001 package of standards includes Version 1.4 of the OASIS Standards. The reference to Version 1.4 is based on the fact that this is the fourth set of revisions to the Version 1.0 OASIS Standards that the Commission adopted in Order No. 889. Open Access Same-Time Information System and Standards of Conduct, 61 FR 21,737 (May 10, 1996), FERC Stats. & Regs. ¶ 31,035 (April 24, 1996). The Version 1.4 reference appears in Standards WEQ-001, WEQ-002, WEQ-003, and WEQ-013.

Quadrant:	Wholesale Electric Quadrant (WEQ)
Recommendation:	Restructure of the WEQ Executive Committee's Subcommittees, Working Groups, and Task Forces.
Submitted By:	Jim Busbin, Jim Hansen, Bob Harshbarger, Marcie Otondo, Narinder Saini, Ed Skiba, Paul Sorenson, JT Wood
Date:	March 27, 2009

At the February 3, 2009 the WEQ Executive Committee directed the subcommittee and JISWG co-chairs to meet to discuss possible changes to the WEQ Executive Committee's subcommittee, working group, task force structure and to submit a proposal for the WEQ Executive Committee to consider during the May 12, 2009.

The chairs met on March 5, 2009, and discussed at a high level the proposed changes recommended below. Since that time the co-chairs have further refined the proposal and conducted analysis of activities that would be required to change the WEQ Executive Committee's subcommittee, working group, task force structure (see Attachment 1). In addition the co-chairs are proposing a number of changes to the NAESB WEQ Committees, Subcommittees, and Task Forces web page to facilitate finding information and understanding how the WEQ is structured (see attachment 2). Finally the co-chairs identified some additional changes that to WEQ web pages to assist in understanding the WEQ structure. The co-chairs are proposing the following recommendations effective July 1, 2009. This will provide time for NAESB, the subcommittees, working groups and task forces to complete their tasks.

Recommendation

- Collapse the WEQ Electronic Scheduling Subcommittee and Information Technology Subcommittee into a single subcommittee named the OASIS Subcommittee.
- Move the Joint Interchange Scheduling Working Group to a subcommittee named the Joint Electric Scheduling Subcommittee
- Move the Seams Subcommittee to the Inactive Subcommittees and Task Forces
- Rename the WEQ Joint BPS/ESS/ITS Meetings on ATC/AFC to the WEQ Joint BPS/OASIS Meetings on ATC to be consistent with merging the ESS/ITS into the OASIS subcommittee.
- Update the NAESB WEQ Committees, Subcommittees, and Task Forces web page as documented in Attachment 2.
- Address additional minor changes documented in Attachment 3, which includes posting the Wholesale Electric Quadrant Executive Committee Organization Structure (see Attachment 4).

Attachment 1 – Activity List for Restructuring WEQ Subcommittees

Consolidation of ESS/ITS

Subcommittee Co-chairs:

- Draft recommendation to be presented to the WEQ EC at the May meeting
- Recommend a date when the merge would occur (July 1, 2009)
- Present recommendation to the WEQ Executive Committee May 12, 2009

Executive Committee:

- Approve subcommittee/working group co-chairs' recommendation

NAESB:

- Send out notification that the ESS and ITS are being collapsed into a single subcommittee. The distribution list should include:
    - WEQ Board Members
    - WEQ EC Members/Alternates
    - ESS email subscription list
    - ITS email subscription list
    - ESS Interactive List Serv
    - ITS Interactive List Serv
    - BPS/ESS/ITS Interactive List Serv

  In the communication it should be noted that those who want to be included on either the OASIS Subcommittee email subscription or Interactive List Serv will need to sign-up on both locations the existing ESS and ITS email subscriptions and Interactive List Serv distribution list will not be migrated to the OASIS subcommittee.
- WEQ Main Page
    - Move the ESS and ITS links on WEQ Main page the Inactive Subcommittees and Task Forces
    - Create new link for OASIS Subcommittee (OS) web page
    - Move link WEQ Order 890 to the OASIS Subcommittee web page
- ESS Web Page
    - Add a note to indicate going forward that the ESS and ITS have been merged into the OASIS Subcommittee
    - Provide link to the OASIS Subcommittee (OS) web page.
    - Remove Procedures for ESS Interactive List Serv (Exploder) from the WEQ ESS web page.
    - Deactivate wegess@naesb.org
    - Delete all meetings beyond the merge date.
- ITS Web Page
    - Add a note to indicate going forward that the ITS and ESS have been merged into the OASIS Subcommittee
    - Provide link to the OASIS Subcommittee (OS) web page.
    - Remove Procedures for ITS Interactive List Serv (Exploder) from the WEQ ITS web page.
    - Deactivate weqits@naesb.org
    - Delete all meetings beyond the merge date.
- Create WEQ OASIS Subcommittee (OS) web page
    - Add all future meetings that were previously assigned to the ESS/ITS
    - Create and post Procedures for OASIS Subcommittee Interactive List Serv (exploder)

Attachment 1 – Activity List for Restructuring WEQ Subcommittees

    - Create weq_os@naesb.org exploder list.
    - Move all active documents from ESS/ITS web pages based on direction from ESS/ITS
    - Add link for WEQ Order 890 to the OASIS Subcommittee web page
- WEQ 2009 Annual Plan
    - Update reassign all open annual plan items assigned to the ESS/ITS to with the OASIS Subcommittee (OS)
    - Update Diagram and Subcommittee Leadership List
- Update WEQ Leadership Roster
- Email Subscription List
    - Remove WEQ ESS and ITS as available options from Email Subscription List
    - Add OASIS Subcommittee (OS) as an available option on the Email Subscription List
- 2009 Calendar and Action Items
    - Update NAESB 2009 calendar reassign future ESS/ITS meetings to the OASIS Subcommittee (OS)
    - Update Calendar of Action Items for any open ESS/ITS Actions (e.g. documents posted for informal comments)

Subcommittee:

- Confirm name of new subcommittee
- Create OASIS Subcommittee (OS) Mission/Scope statement *(note this may be completed after the merge date)*
- Rename/Progress Report
- Rename any works in progress to reference the OASIS subcommittee (OS)
- Identify any documents that NAESB should move from the ESS/ITS web pages

Attachment 1 – Activity List for Restructuring WEQ Subcommittees

Establishing JISWG as a Subcommittee

Subcommittee Co-chairs:

- Draft recommendation to be presented to the WEQ EC at the May meeting
- Recommend a date when the JISWG becomes the Joint Electric Scheduling Subcommittee (July 1, 2009)
- Present recommendation to the WEQ Executive Committee May 12, 2009

Executive Committee:

- Approve subcommittee/working group co-chairs' recommendation

NAESB:

- Send out notification that the JISWG will become the Joint Electric Scheduling Subcommittee. The distribution list should include:
  - WEQ Board Members
  - WEQ EC Members/Alternates
  - ESS email subscription list
  - ESS Interactive List Serv
  - NERC

  Notification should include that we are creating an Email subscription list for the subcommittee and that people should sign-up to receive notifications of subcommittee activities.
- Update WEQ Main page
  - Rename Joint Interchange Scheduling Working Group (JISWG) link so to the Joint Electric Scheduling Subcommittee (JESS)
  - Move reference so that it is at a subcommittee level under the WEQ Executive Committee Level.
- WEQ 2009 Annual Plan
  - Update reassign all open annual plan items assigned to the JISWG to with the Joint Electric Scheduling Subcommittee
  - Update Diagram and Subcommittee Leadership List
- Update WEQ Leadership Roster
- Email Subscription List
  - Add new subcommittee as available option on the Email Subscription List
- 2009 Calendar and Action Items
  - Update NAESB 2009 calendar reassign future JISWG meetings to the Joint Electric Scheduling Subcommittee
  - Update Calendar of Action Items for any open JISWG Actions (e.g. documents posted for informal comments)
- Current JISWG Page
  - Rename to Joint Electric Scheduling Subcommittee Webpage
  - Create Procedures for Interactive List Serv (Exploder)
  - Create weq_jess@naesb.org

Subcommittee:

- Confirm name of new subcommittee
- Create New Mission Scope Statement
- Rename any works in progress to reference the subcommittee

Attachment 1 – Activity List for Restructuring WEQ Subcommittees

Move Seams Subcommittee to Inactive:

Subcommittee Co-chairs:

- Draft recommendation to be presented to the WEQ EC at the May meeting
- Recommend a date when the subcommittee will be moved to inactive (July 1, 2009)
- Present recommendation to the WEQ Executive Committee May 12, 2009

Executive Committee:

- Approve subcommittee/working group co-chairs' recommendation

NAESB:

- Send out notification that the Seams Subcommittee will be moved to inactive subcommittee. The distribution list should include:
  - WEQ Board Members
  - WEQ EC Members/Alternates
  - Seam Interactive List Serv
- Update WEQ Main page (Move Seams Subcommittee to list of inactive subcommittee and task forces)
- Update WEQ Seams Subcommittee Page:
  - Add note at top of the page that the Subcommittee completed its work and that it was moved to an inactive subcommittee.
  - Delete Procedures for WEQ Seams Subcommittee Interactive List Serv (Exploder)
- Deactivate weq_seams@naesb.org.
- Update WEQ Leadership Roster (Remove WEQ Seams)

Attachment 1 – Activity List for Restructuring WEQ Subcommittees

Rename Joint BPS/ESS/ITS Meetings on ATC/AFC:

Subcommittee Co-chairs:

- Draft recommendation to be presented to the WEQ EC at the May meeting
- Recommend a date when the subcommittee will be renamed to the Joint BPS/OS Meeting on ATC/AFC (July 1, 2009)
- Present recommendation to the WEQ Executive Committee May 12, 2009

Executive Committee:

- Approve subcommittee/working group co-chairs' recommendation

NAESB:

- Update WEQ Main page (Rename Joint BPS/ESS/ITS Meetings on ATC/AFC to Joint Business Practices/OASIS Subcommittees (BPS/OS) Meetings on ATC/AFC)
- Update WEQ Joint BPS/ESS/ITS Meetings on ATC/AFC Page:
    - Add note at top of the page that the page has been renamed as a result of merging to the ESS and ITS to the OASIS Subcommittee (OS).
    - Rename Procedures for BPS/ESS/ITS Interactive List Serv (Exploder) to Procedures for BPS/OS Interactive List Serv (Exploder)
- Deactivate weq_bps_ess_its@naesb.org
- Create weq_bps_OASIS_@naesb.org distribution list. (this should be WEQ_bps_os@naesb.org to be consistent with the WEQ_os@naesb.org)
- Send note to weq_bps_ess_its@naesb.org to let them know the exploder list is being changed to weq_bps_OASIS_@naesb.org (this should be WEQ_bps_os@naesb.org to be consistent with the WEQ_os@naesb.org)
- Move individual from weq_bps_ess_its@naesb.org to weq_bps_OASIS_@naesb.org (this should be WEQ_bps_os@naesb.org to be consistent with the WEQ_os@naesb.org)

Attachment 2 – Modifications to WEQ Main Page

WEQ Web Page Modifications:

WEQ Standards
WEQ Final Actions
WEQ NAESB WEQ Funds Transfer Agent Agreement (FTAA) - WEQ 010

Request, Interpretations, and Standards Development Activity Applicable to WEQ
Minor Correction Activity Applicable to WEQ

Member Ratification: Standards, Board Actions, etc.

Link to NERC Standards

WEQ Annual Plan

NAESB Leadership Roster

Advisory Council

WEQ Board of Directors
- Board Certification Program Committee
- Board Gas-Electric Interdependency Committee
- Board Managing Committee
- Board Resource Committee
- Board Retail Awareness Committee
- Board Retail Structure Review Committee
- Parliamentary Committee
- WEQ Procedures Drafting Collaborative

WEQ Executive Committee
- Annual Plan Subcommittee
- Triage Subcommittee
- WEQ Business Practices Subcommittee (BPS)
  - Time and Inadvertent Management Task Force
- WEQ OASIS Subcommittee (OS)
- WEQ Joint Business Practices/OASIS Subcommittees (BPS/OS) Meetings on ATC/AFC
- WEQ Joint Electric Scheduling Subcommittee (JESS) *previously JISWG*
- WEQ Interpretations Subcommittee
- WEQ Standards Review Subcommittee (SRS)
- WEQ/REQ/RGQ Demand Side Management and Energy Efficiency
- WEQ/WGQ e-Tariff Activities

Inactive Subcommittees and Task Forces:

Board ERO Committee
WEQ Contracts Subcommittee
Funds Transfer Agent Agreement (FTAA) Task Force
Master Services Agreements (MSA) Task Force
Coordinate Interchange Business Practices (CIBP) Task Force

Attachment 2 – Modifications to WEQ Main Page

Coordinate Operations Business Practices (COBP) Task Force
Energy Day Subcommittee
ESS OASIS II Task Force
Gas Electric Coordination Task Force (GECTF)
WEQ Glossary Subcommittee
Inadvertent Interchange Payback Task Force (IIPTF)
NERC-NAESB Joint Interface Committee (JIC)
WEQ Market Operations Subcommittee (MOS)
Electric Trading Task Force (ETTF)
WEQ Market Standards Subcommittee (MSS)
OASIS Task Force
WEQ Quadrant Formation
WEQ RTO/ISO NERC/NAESB Team
Transmission Loading Relief (TLR) Group
WEQ Electronic Scheduling Subcommittee (ESS)
WEQ Information Technology Subcommittee (ITS)
WEQ Seams Subcommittee

Summary of changes to NAESB WEQ Committees, Subcommittees, and Task Forces not previously referenced.

- Remove link to NERC's Reliability Functional Model. The current link does not work.
- Add link to NERC Standards page
- Group ratified standards together (WEQ Standards, WEQ Final Actions, and WEQ NAESB WEQ Funds Transfer Agent Agreement (FTAA) - WEQ 010)
- Group under development items together (Standards, Minor Corrections, and Interpretations)
- Under the WEQ Standards page, it is recommended that the current FERC approved version of the standards be identified as having been acted on by FERC. Along with this designation a link to the FERC Order that specifies the sections of the standards are being incorporated by reference
- Add a link for the WEQ Annual Plan
- Restructure Board Committees, WEQ Subcommittees, and Task Forces according to organizational structure.
- Rename link for Membership ratification to avoid confusion people have about standards being approved by the Board.
- Merge the following pages into a single page titled "Request, Interpretations, and Standards Development Activity Applicable to WEQ"
    - Request and Standards Development Activity Applicable to WEQ
    - WEQ Clarification Requests
    - WEQ Request for Comments on Interpretations

  The page should identify which items are Standards Requests, Interpretations (sometimes referred to as clarifications) or Annual Plan Items. Since the Interpretations follow the same general flow as Standards Requests they could be added to this page with minimal effort.

Attachment 2 – Modifications to WEQ Main Page

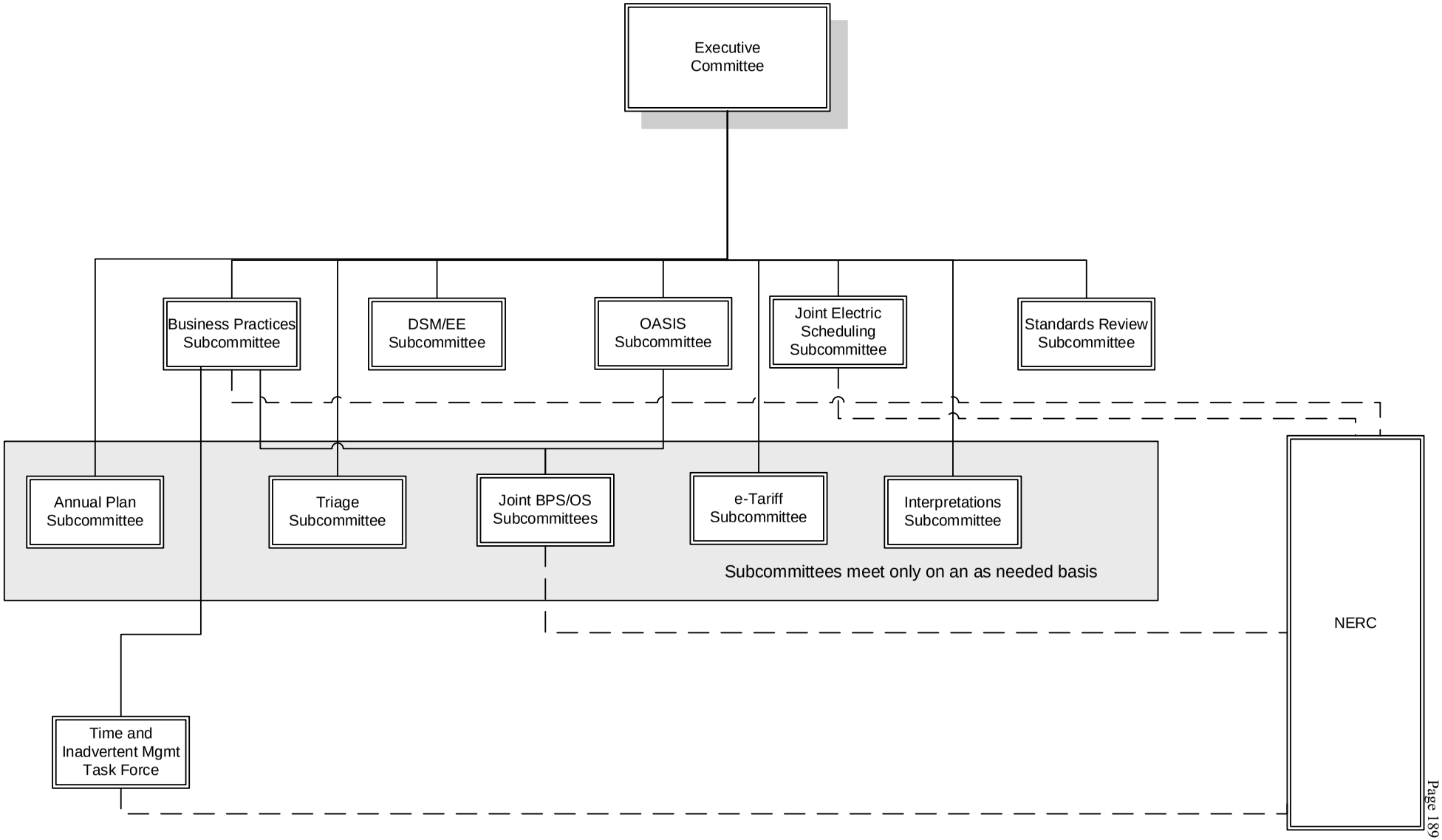
- The link to “Minor Correction Activity Applicable to WEQ” would be a single page similar to the “Request, Interpretations, and Standards Development Activity Applicable to WEQ” page but would be specific to Minor Corrections. The proposed column headings for this page are:
    - Minor Correction Identifier
    - Quadrant
    - Description
    - Date Submitted
    - Requester
    - EC Status
    - Comments on Minor Correction
    - Response to Comments
    - Final Action

Attachment 3 – Additional Changes to Support Subcommittee Restructure

- Post the approved Wholesale Electric Quadrant Executive Committee Organization Structure as a link on the WEQ Executive Committee web page
- Delete TLR Task Force from the Leadership Roster

Attachment 4 – Proposed Organization Structure

Wholesale Electric Quadrant Executive Committee Organization Structure



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Home Page: www.naesb.org

April 21, 2009
Via email and posting

TO:	**NAESB Executive Committee (EC) Members, EC Alternates** **Submitters:** Kevin Gresh, Robert Walker, Louise Bradford, Mike Schisler, Amy Castronovo **Subcommittee Chairs for notification:** Valerie Crockett, Richard Smith, Kim Van Pelt, Steve Abbey (WGQ BPS), Marcie Otondo, J.T. Wood, Paul Sorenson (WEQ ESS), Leigh Spangler, Christopher Burden (WGQ EDM)
FROM:	NAESB Office
RE:	NAESB Triage Actions Taken for R08027 to R09007

Dear Triage Subcommittee and EC members,

Several requests were sent out for review and determination of disposition on April 9, R08027-R09007, all provided below as hyperlinks. Comments on Request R09004 were forwarded to the WGQ EC and incorporated into the disposition. There were no requests for conference call for discussion. The requests were triaged as follows:

For R08027– submitted by Kevin Gresh on behalf of PJM Interconnection, LLC:

> This request is (1) found within scope; (2) to be assigned to the Wholesale Electric Quadrant (WEQ); and (3) because it is a request to modify WEQ 013-2.6.7.2 – RESALE Off-OASIS so that Off-OASIS resale transactions are posted directly to OASIS in ACCEPTED status, the request should be assigned to the WEQ Electronic Scheduling Subcommittee (ESS). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WEQ ESS.

For R08028 – submitted by Bill Griffith on behalf of El Paso Natural Gas Company

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to delete the electronic transaction WGQ Standard No. 5.4.4 (Replacement Capacity), the request should be assigned to the WGQ Business Practices Subcommittee (BPS). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ BPS.

For R09001 – submitted by Paul Love on behalf of Natural Gas Pipeline Company of America

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add data elements to the Transactional Reporting Interruptible Transportation Document (WGQ Standard No. 5.4.22), the request should be assigned to the WGQ Business Practices Subcommittee (BPS). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ BPS.
>
> The data elements to be added, "Negotiated Rate Indicator" and an "All Points Indicator," would clarify that either the interruptible contract is a negotiated rate contract as defined by FERC regulations or would clarify that the contract contains all nominatable receipt and delivery points.

For R09002 – submitted by Amy Castronovo on behalf of Enbridge Inc.

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to modify Appendices B and C of the QEDM manual to add to ActiveX control browser plug-ins Microsoft Reporting Services Client Print Control and Microsoft Silverlight, it should be assigned to WGQ Electronic Delivery Mechanisms Subcommittee (EDM). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ EDM.

For R09003 – submitted by Robert Walker on behalf of Cargill Power Markets, LLC

> This request is (1) found within scope; (2) to be assigned to the Wholesale Electric Quadrant (WEQ); and (3) because it is a request to modify the standards WEQ 001-4.1 to 4.18 for the online negotiation and confirmation process, the request should be assigned to the WEQ Electronic Scheduling Subcommittee (ESS). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WEQ ESS.

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For R09004 and attachment – submitted by Louise Bradford on behalf of Panhandle Energy Pipelines, with other submitters

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to modify NAESB WGQ Standard Nos. 4.3.23, 4.3.26, 4.3.32 and 4.3.33, and add one new WGQ Standard 4.3.xx to conform existing standards to the new eTariff standards, ratified by NAESB membership on April 4, 2008 and adopted in the Commission's Order No. 714, Electronic Tariff Filings, Final Rule, issued on September 19, 2008, it should be assigned to the WGQ Business Practices Subcommittee (BPS) followed by Electronic Delivery Mechanisms Subcommittee (EDM). To ensure placement in Version 1.9, the request should be assigned a high priority by both the WGQ BPS followed by the WGQ EDM subcommittees.

For R09005 and attachment – submitted by Mike Schisler on behalf of Natural Gas Pipeline Company of America

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to modify Appendix D of the QEDM manual to remove references to UDP 1604 for Secure ICA, it should be assigned to WGQ Electronic Delivery Mechanisms Subcommittee (EDM). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ EDM.

For R09006 – submitted by Christopher Burden and Dale Davis on behalf of Williams Gas Pipeline

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add of a new data element "Contract" to NAESB WGQ Standard No. 3.4.2 (Payment Remittance) and NAESB WGQ Standard No. 3.4.4 (Service Requester / Charge Allowance Invoice), the request should be assigned to the WGQ Business Practices Subcommittee (BPS). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ BPS.

For R09007 – submitted by Christopher Burden and Dale Davis on behalf of Williams Gas Pipeline, with other submitters

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to modify Appendices B and C of the QEDM manual to delete Netscape as a supported browser and add Mozilla Firefox as a browser option, it should be assigned to WGQ Electronic Delivery Mechanisms Subcommittee (EDM). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ EDM.

If you have any questions on a specific request, please contact the requestor directly -- their email addresses are provided above. The noted dispositions for the requests and the requests themselves were forwarded to the Triage Subcommittee and the EC members on April 9. There were no dissenting comments received. Comments were received on Request No. R09004 to extend the assignment to the WGQ BPS first and change the priority to high to ensure inclusion in the Version 1.9 publication. As such, the requests are considered in scope and assigned to the indicated subcommittees for development. Please note that this communication serves as notice to the subcommittee chairs of the subcommittees to which the requests are assigned.

Business Practices Subcommittee Update

May 12, 2009

WEQ BPS Update

- Meetings
  - February 10, 2009 May 18, 2009
  - March 10, 2009 June 16, 2009
  - April 13, 2009 July 13, 2009
- Completed Activities
  - Annual Plan Items:
    - Recommendation for WEQ 2009 Annual Plan Item 3.d Develop business practice standards in support of FERC Order No. 717 http://www.naesb.org/pdf4/weq_2009_ap_3d_rec.doc
    - Recommendation for WEQ 2009 Annual Plan Item 6.a.2 Gas/Electric Communications Consistency Changes (R08004)http://www.naesb.org/pdf4/weq_2009_api_6a2_r08004_rec.doc
  - Subcommittee's Mission and Scope Statement http://www.naesb.org/pdf4/weq_bps_mission_scope_statement.pdf
- Upcoming Activities
  - Begin working on WEQ 2009 Annual Plan Item 1.b.i Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection
  - Update WEQ-008 Appendix D to include the Market Flow Threshold Percentage recommended by NERC working group/task force
- Note
  - The BPS would recommend that the changes to the NAESB Business Practices related to Annual Plan Item 3.d be filed with FERC as soon as they are ratified rather than waiting until the version 2.2 standards filing in first quarter 2010

WEQ/WGQ BPS Update

- Meetings
  - March 12, 2009
  - April 22, 2009
- Completed Activities
  - The WEQ BPS has completed its activities related to WEQ 2009 Annual Plan Item 3.e Provide for Enhanced Granularity for Public Utilities in Identifying Critical Operational Flow Orders (R08020) Note: The WGQ has some standards development that will be scheduled
- Upcoming Activities
  - Standards Request to change Power Plant Operator to Power Plant Gas Coordinator

Joint NERC TLRSDT/ NAESB BPS Update

- Meetings
  - February 20, 2009
  - April 28, 2009
- Ongoing Coordination
  - Continuing discussion on how the results of the Market Flow Threshold Field Test will feed into the NAESB Standards Development Process for WEQ-008 Appendix D.
  - Review comments submitted and revised draft standards IRO-006.5 and IRO-006-EAST.1
- Upcoming Activities
  - Post response to comments and revised standards IRO-006.5 and IRO-006-EAST.1
- Note
  - NERC work on the Parallel Flow Visualization project may be addressed through the NERC Operations Reliability Subcommittee (ORS) and the Interchange Distribution Calculator Working Group (IDCWG) rather than through the NERC TLRSDT
  - EPSA, NRG, and Constellation Request for Rehearing on NERC TLR Standards

Joint NERC BACSDT/ NAESB TIMTF Update

- Meetings
  - March 26-27, 2009
  - April 3, 2009
  - April 21, 2009
- Ongoing Coordination
  - Assisting NERC Balancing Authority Controls Standards Drafting Team (BACSDT) with plans for time error correction field trial
  - Coordination will depend on Executive Committee/Business Practice Subcommittee direction and FERC Order No.693 matrix
- Upcoming Activities
  - NERC BACSDT drafting matrix of FERC Order No. 693 and their proposed standards to meet the directives
  - Matrix will form basis of future business practices

Questions/Feedback

WEQ ESS/ITS Progress Report

Based on WEQ 2009 Annual Plan As of April 13, 2009

2008 Annual Plan Item	2009 Annual Plan Item	Annual Plan Item	Scheduled	Underway	Concept Discussion	Draft Recommen-dation	Sub-committee Review	Post Informal Comments	Review Comments	Sub-committee Final Review	Sub-committee Approval	NAESB Clean-up	Post for Formal Comments	EC Passed	Ratified
2.a.iii.1	2.a.i.1	Use of OASIS to Make Electronic Requests to Des													
2.a.iii.2	2.a.i.2	Ability to Query Requests to Designate and Termi													
2.a.iii.3	2.a.i.3	Masking of Designated Network Resource Operat													
2.a.iii.4	2.a.i.4	Procedural Requirements for Submitting Designat													
2.a.iii.5	2.a.i.5	Specify How Designated Network Service Inform													
2.a.iii.6	2.a.i.6	Set Forth the Treatment of OASIS Requests when													
2.a.iii.7	2.a.i.7	Procedural Requirements for Submitting Both Ter													
2.a.iii.8	2.a.i.8	Procedures for Submitting and Processing Reques													
2.a.iv.1	2.a.ii.1	Pre-Emption													
2.a.iv.2	2.a.ii.2	Request No. R05019													
2.a.iv.3	2.a.i.3	Revisions to Standard 9.7													
2.a.v.1	2.a.iii.1	Paragraph 1377													
2.a.v.2	2.a.iii.2	Re-Bid Of Partial Service across Multiple Transm													
2.a.vi.1	2.a.iv.1	Paragraph 1390 of Order 890													
2.a.vi.2	2.a.iv.2	Paragraphs 1627 of Order 890													
2.a.vi.3	2.a.iv.3	Redispatch Cost Posting to allow for posting of thi													
2.b.i.1	2.b.i.1	The processing of transmission service requests, v													
3.a.ii	3.a.i	Network Services: Determine and develo													
3.a.v	3.a.iii	Document procedures used to implement													
3.a.vi.2	3.a.iv.1	Eliminate Masking of TSR tag source and sink wh													
3.a.vi.4	3.a.iv.2	Initiate standard that eliminates the disparity of po													
3.a.vi.5	3.a.iv.3	Enhance the TSR result postings to allow showing													
3.b.ii	3.b.ii	Develop PKI standards for OASIS.													
6.c.1	6.a.1	OASIS Consistency Changes (R08001, R08002, R													
6.n	6.d	Consistent with ¶51 of FERC Order No. 8													
provisional 5	provisional 2	Develop business practices for allocating													

LEGEND:

Progress legend

- Completed Prior to February 2009 EC Meeting
- Completed since February 2009 EC Meeting

AP item legend

- 890 Work Plan
- Normal Annual Plan Items
- New Items Added

2009 AP item legend

- AP items linked to 9.7
- AP items linked to nits
- AP items linked to R05019
- AP items linked to services across multiple TP
- AP items that stand alone

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Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
ATC GROUP ASSIGNMENTS (ESS/ITS and BPS)					
✔	243, 244, 246	Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitment (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard* Paragraphs 243, 244, and 246 will require coordination with the NERC Order 890 reliability standards development *Posting requirements for ETC assigned to ESS/ITS (see 2008 AP 2(a)(vi)(4) and Order 890 WP, Group 6) **Order 890-A:** 63. The Commission also found that inclusion of all requests for transmission service in ETC would likely overstate usage of the system and understate ATC. The Commission therefore found that reservations that have the same point of receipt (POR) (generator) but different point of delivery (POD) (load), for the same time frame, should not be modeled in the ETC calculation simultaneously if their combined reserved transmission capacity exceeds the generator's nameplate capacity at the POR. The Commission directed public utilities, working through NERC, to develop requirements in MOD-001 that lay out clear instructions on how these reservations should be modeled. The Commission also concluded that some elements of ETC are candidates for business practices instead of reliability standards and directed public utilities, working through NAESB, to develop business practices necessary for full implementation of the MOD-001 reliability standard. 151. We decline to impose additional posting requirements regarding ETC uses, as requested by EPSA and Powerex. In Order No. 890, the Commission required transmission providers to make available all data used to calculate ATC for constrained paths and any system planning studies or specific network impact studies performed for customers. This would include information regarding ETC uses, including grandfathered agreements, that affect ATC calculations or study results. EPSA and Powerex fail to demonstrate that it is necessary to require the posting of additional information regarding ETC uses to verify the accuracy of the transmission provider's ATC calculations. We note in response to Powerex that, if any new service taken upon expiration of a pre-Order No. 888 contract, the terms and conditions of the transmission provider's OATT would apply.	WEQ 2008 Annual Plan Item 2(b)(ii)(1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter , 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	The NAESB ESS/ITS and BPS are working to draft complementary business practices to the NERC MOD028, MOD029, and MOD030, which includes ETC. The NERC team has determined that there is not a need for explicit posting of ETC values; the ESS/ITS and BPS supports the decision. ESS/ITS/BPS will look at the NERC MODs to determine if additional business practices are needed for ETC components. Recommendation was voted out of subcommittee on June 17, 2008. Formal comment period closed on July 21, 2008. Approved by WEQ EC August 19, 2008. Ratified by the membership on 9/22/2008.

[1] Status is defined as: ✔ - Complete, C – formal commenting period, I – in progress of standards development underway in subcommittee, NS – development not started.

Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
✔	293	• Business practice standards for accounting for **counterflows**. These standards will be included in the ATC business practice standards (Paragraph 293 will require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(ii)(2)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter 2008	The ESS/ITS and BPS have created a list of items that are considered post-backs to be used in the creation of post back requirements. NERC has requested that NAESB practices address post-back requirements. (8/16/07) On March 11-12, 2008, the ESS/ITS and BPS passed motions to define high level concepts for counterflows and post backs. Draft standards are being developed by sub-teams. Subcommittee voted recommendation for counterflows and Postbacks out of subcommittee on May 15, 2008. Formal comment period closed on June 23, 2008. Approved by WEQ EC August 19, 2008. Ratified by the membership on 9/22/2008.
✔	257	**Capacity Benefit Margin (CBM) Business Practices** • Business practice standards to set forth "how the CBM value shall be determined, allocated across transmission paths, and used" and how transmission providers will "reflect the set-aside of transfer capability as CBM in the development of the rate for point-to-point transmission service." (Paragraph 257 will require coordination with the NERC Order 890 reliability standards development) **Order 890-A:** 68. The Commission directed public utilities, working through NERC and NAESB, to develop clear standards and business practices for how the CBM value is determined,	WEQ 2008 Annual Plan Item 2(b)(iii)(1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD004. The ESS/ITS and BPS have identified the NAESB business practice standards that may be needed to address CBM, including

Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
		allocated across transmission paths and flowgates, and used. To ensure that CBM is used for its intended purpose, the Commission provided that CBM shall only be used to allow an LSE to meet its generation reliability criteria. The Commission rejected requests to allow CBM to be used to meet reserve-sharing needs, explaining that TRM is the appropriate category for that purpose. Public utilities were directed to work with NAESB to develop an OASIS mechanism that will allow for auditing of CBM usage. 83. The Commission did not mandate a particular methodology for allocating CBM over transmission paths and flowgates in Order No. 890. We therefore reject Southern's argument that development of a consistent methodology for calculating CBM would be harmful to LSEs because reserve needs vary from area to area. While we expect the NERC and NAESB process to produce a consistent and transparent process for setting aside and allocating CBM based on LSE requests, we decline to prescribe a specific method for how CBM should be obtained or allocated or otherwise determine the amount of capacity that the transmission provider has to set aside in response to requests from multiple LSEs.		Quarter, 2008 RATIFICATION: 4th Quarter, 2008	where the CBM value shall be posted; how to allocate priority use of CBM; how to allocate the amount of CBM; the ability to audit CBM usage; a new request type on OASIS to distinguish a CBM reservation; and for the posting of CBM on the OASIS systemdata template. The joint subcommittee has determined no additional standards need to be developed for this work plan item. Recommendation voted out of subcommittee on July 30th. Formal Comment period closes September 5, 2008. Approved by WEQ EC November 7, 2008. Ratified by the membership on December 15, 2008.
✔	262	• Business practice standards that include an OASIS mechanism to "allow for auditing of CBM usage." (Paragraph 262 does not require coordination with the NERC Order 890 reliability standards development) **Order 890-A:** 68. The Commission directed public utilities, working through NERC and NAESB, to develop clear standards and business practices for how the CBM value is determined, allocated across transmission paths and flowgates, and used. To ensure that CBM is used for its intended purpose, the Commission provided that CBM shall only be used to allow an LSE to meet its generation reliability criteria. The Commission rejected requests to allow CBM to be used to meet reserve-sharing needs, explaining that TRM is the appropriate category for that purpose. Public utilities were directed to work with	WEQ 2008 Annual Plan Item 2(b)(iii)(2)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for CBM, including auditing of CBM usage. 8/16/07 If we are using existing templates and the existing templates have corresponding "Audit Templates", additional

Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
		NAESB to develop an OASIS mechanism that will allow for auditing of CBM usage.			work may not be needed. The joint subcommittee is working with JISWG on this annual plan item. Changes are expected to be required for WEQ 001, 002, 003, 004, and 013. Recommendation voted out of subcommittee on July 30th. Formal Comment period closes September 5, 2008. Approved by WEQ EC November 7, 2008. Ratified by the membersship on December 15, 2008.
✔		• Any additional business practice standards needed to complement the NERC CBM reliability standards (MOD004) created as a result of this effort. (This item is a catchall section in case there are areas where business practices are needed as a result of the NERC CBM reliability standards. This item will require coordination with the NERC Order 890 reliability standards development).	WEQ 2008 Annual Plan Item 2(b)(iii)(3)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter,, 2008	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD004. The joint subcommittee has determined no additional standards need to be developed for this work plan item. Recommendation voted out of subcommittee on July 30th. Formal Comment period closes September 5, 2008. Approved by WEQ EC November 7, 2008. Ratified by the membership on December 15, 2008.

Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
✔	272	• Transmission Reliability Margin (TRM): Business Practice Standards to complement the NERC reliability standards for TRM (Paragraph 272 will require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(iv) (1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD008. The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for TRM, 8/16/07 The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 3/31/08. Recommendation posted for 30-day formal comment period on April 8th. The recommendation was voted out of the EC on May 13.
✔	273	• The TRM business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM (Paragraph 273 will require coordination with the NERC Order 890 reliability standards development) **Order 890-A:** 94. The Commission clarifies that NERC was not directed to identify an actual number or a particular methodology to include in the TRM standards, MOD-008-0 and MOD-009-0. The Commission's intent was to require NERC and NAESB to include consistent criteria and guidelines in the calculation and uses of TRM by transmission providers. Likewise, in response to Southern's concern regarding flexibility to use something other than the ratings reduction method discussed in Order No. 890, we clarify that the ratings reduction method is only an example of a simple method that could be used. Our intent is not to prohibit a transmission provider from using a more sophisticated method, so long as it is consistent with the reliability standards developed	WEQ 2008 Annual Plan Item 2(b)(iv)(2)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD008. The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for TRM, 8/16/07 The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to

Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
		by NERC.			develop recommendation and post formal comments 3/31/08. Recommendation posted for 30-day formal comment period on April 8th. The recommendation was voted out of the EC on May 13.
✔		• Any additional business practice standards needed to complement the NERC TRM reliability standards (MOD008) created as a result of this effort (This item is a catchall section in case there are areas where business practices are needed as a result of the NERC TRM reliability standards. This item will require coordination with the NERC Order 890 reliability standards development).	WEQ 2008 Annual Plan Item 2(b)(iv)(3)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD008. The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for TRM, 8/16/07 The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 3/31/08. Recommendation posted for 30-day formal comment period on April 8th. The recommendation was voted out of the EC on May 13.
✔	301	Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer		**These dates are dependent on NERC deliverables and may be changed if NERC**	The ESS/ITS and BPS has drafted several sets of language and is in the process of coordinating

Status[1]	Cite	Order 890 Work Plan			
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		Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)): • Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards (Paragraph 301 will require coordination with the NERC Order 890 reliability standards development) **Order 890-A:** 53. We clarify in response to NorthWestern that TRM may be used to accommodate the procurement of ancillary services used to provide service under the pro forma OATT. We deny as premature EPSA's and Williams' requests for clarification regarding the realtime determination and posting of ATC and AFC values, as well as posting of utilization of transmission provider's own system ETC. In Order No. 890, the Commission required an exchange of the data both for short and long-term ATC/AFC calculation that will increase the accuracy of ATC calculations.[33] The Commission also required that ATC be recalculated by all transmission providers on a consistent time interval, and in a manner that closely reflects the actual topology of the system, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data, and that NERC/NAESB revise the related reliability standard and business practices accordingly.[34] EPSA and William should address their concerns through the NERC and NAESB processes implementing these requirements. 60. Order No. 890 requires NERC and NAESB to develop a single set of ATC-related standards that will apply to all transmission providers, including RTOs and ISOs. We understand that the NERC ATC standard drafting team includes representatives from various industry sectors, including RTOs/ISOs, and we encourage NYISO to participate in the standard development process to provide NERC an opportunity to address its concerns. To the extent NYISO feels its concerns are not address in this process, it should bring the issue to the Commission's attention on review of the resulting reliability standards. 101. The Commission directed public utilities, working through NERC and NAESB, to revise reliability standard MOD-001 to require ATC to be recalculated by all transmission providers on a consistent time interval and in a manner that closely reflects the actual topology of the system, e.g., generation and transmission outages, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data. The Commission stated that this process must also consider whether ATC should be calculated more frequently for constrained facilities. 104. The Commission agrees with Powerex that the standards adopted through the NERC and NAESB processes should serve as minimum or "no less frequent than" requirements to recalculate ATC. Transmission providers also must update their ATC calculation	WEQ 2008 Annual Plan Item 2(b)(v)(1)	**timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: N/A	alignment with the NERC ATC Drafting Team. The ESS/ITS and BPS are drafting documents that will facilitate agreement on concepts/scope. The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 4/16/08. Recommendation posted for 30-day formal comment period on April 23rd. Approved by WEQ EC August 19, 2008.

Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
		when they receive substantial and material changes in data, such as updated load forecasts, changes in topology and dispatch patterns, which may be more frequent than the NERC and NAESB standards would otherwise require. In the absence of substantial and material changes in data, transmission providers are not required to update ATC on a more frequent basis than the minimum frequency that the NERC and NAESB standards require, once implemented. The Commission will consider the adequacy of the time frame for ATC updates on review of these standards. 148. In Order No. 890, the Commission required transmission providers to make available, upon request, all data used to calculate ATC, TTC, CBM and TRM for any constrained posted path. We believe that this adequately addresses Constellation's request for access to modeling data used by the transmission provider. Specifically, we expect transmission providers to make available, upon request and subject to appropriate confidentiality protections and CEII requirements, the following modeling data: (1) load flow base cases and generation dispatch methodology; (2) contingency, subsystem, monitoring, change files and accompanying auxiliary files; (3) transient and dynamic stability simulation data and reports on flowgates which are not thermally limited; (4) list of transactions used to update the base case for transmission service request study; (5) special protection systems and operating guides, and specific description as to how they are modeled; (6) model configuration settings; (7) dates and capacities of new and retiring generation; (8) new and retired generation included in the model for future years; (9) production cost models (including assumptions, settings, study results, input data, etc.), subject to reasonable and applicable generator confidentiality limitations; (10) searchable transmission maps, including PowerWorld or PSSE diagrams; (11) OASIS names to Common Names table and PTI bus numbers; and, (12) flowgate and interface limits including limit category (thermal, steady state or transient, voltage or angular). We decline, however, to require the transmission provider to post this information on OASIS, as Constellation suggests. We conclude that making this information available on request provides sufficient transparency for customers without unduly burdening the transmission provider. 149. With regard to the modeling support information sought by Constellation, we believe much of this information should already be stated in each transmission provider's Attachment C. In Order No. 890, the Commission required each transmission provider to set forth in the Attachment C to its OATT the ATC calculation methodology used by the transmission provider. To the extent necessary, we clarify that the step-by-step modeling study methodology and criteria for adding or eliminating flowgates (permanent and temporary) is part of the ATC methodology that must be stated in the transmission provider's Attachment C. We direct any transmission provider that has failed to include this information in its Attachment C to include that information as part of the compliance filing directed in section II.C. If the transmission provider has already			

Status[1]	Cite	Order 890 Work Plan			
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		satisfied this obligation in a previous compliance filing, it should refer to that filing instead. 150. We deny as premature Constellation's request to require OASIS postings of additional model benchmarking and forecasting data/TSR study audit data. Such information would be utilized in the process of updating and benchmarking models to actual events, which is the subject of ongoing efforts to modify relevant reliability standards from the MOD and facilities design, connections and maintenance (FAC) groups. 152. We deny TDU Systems' request to require transmission providers to grant customers access to proprietary modeling software used to calculate ATC values. The Commission believes at this time that the requirements of Order No. 890 are sufficient to achieve the Commission's transparency goals without further requiring the disclosure of proprietary software.			

Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
✔	310	• Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards including any OASIS posting requirements to achieve the data exchange (Paragraph 310 will require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(v)(2)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	NERC will be addressing data exchange standards and will identify any new OASIS posting requirements or template query requirements which are needed in order to facilitate data exchange for ATC modeling On March 13, 2008 the ESS/ITS and BPS determined the work associated to this item has been completed by NERC and recommended no further action be taken by NAESB. Recommendation posted for 30-day formal comment period on March 17th. The recommendation was voted out of the EC on May 13.
✔	369	• Business practice standards that will set forth how transmission providers will post "explanations of the reason for a change in monthly and yearly ATC values on a constrained path." The standards will include a requirement that the transmission provider post the reason for the change in a narrative form. The posted information will include "the (1) specific events which gave rise to the change and (2) new values for ATC on that path (as opposed to all points on the network)." (Paragraph 369 will not require coordination with the NERC Order 890 reliability standards development) Although not specified in the WEQ 2008 AP, it is expected that this standard will also contain requirements associated with annotations when ATC remains at zero for six months or longer. **Order 890-A:** 124. We believe that E.ON U.S. overestimates the burden of complying with this requirement. Since TTC standardization is ongoing, it is impossible to identify with	WEQ 2008 Annual Plan Item 2(b)(v)(3)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Voted out of subcommittee for formal comment on February 13, 2008. Approved by the EC via notational ballot on April 14th. Membership ratification completed on May 16th.

Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
		precision the steps that will need to be taken to comply with the posting requirement. The appropriate forum to raise concerns regarding the burden of particular TTC calculation requirements is in the NAESB standards development process. In any event, we would expect that the posting of narratives for changes in monthly and yearly ATC values as a result of a 10 percent change in TTC will be triggered mainly by topology changes resulting from transmission lines and generator in-service status, as well as new facilities additions, that are reported on OASIS. 125. We clarify in response to Southern that transmission providers do not need to list each and every circumstance or occurrence that impacts TTC values from the previous month or year and, instead, may list the primary events that give rise to the update. Again, we expect that TTC changes will generally result from topology changes and, therefore, the primary reasons for an update would be changes in schedules of transmission or generation additions, prolonged outages, or changes in maintenance schedules causing a TTC change of 10 percent. We agree with Southern that the transmission provider should post these narrative explanations on OASIS via a template and data element that is to be defined by NAESB. We direct transmission providers, working through NAESB, to develop the OASIS functionality necessary for such postings. Pending completion of this work by NAESB, we direct transmission providers to post these narrative explanations as comments on OASIS.			
✔	413	• Business practice standards for posting on OASIS of the "underlying load forecast assumptions for all ATC calculations" (Paragraph 413 will not require coordination with the NERC Order 890 reliability standards development) **Order 890-B:** 35. We clarify, however, that the Commission intended for transmission providers to post the underlying factors used to make load forecasts that have a significant impact on calculations, such as temperature forecasts, not all economic and other data that underlies each and every daily load forecast. Transmission providers must post a description of their load forecast method including how economic and weather assumptions are used in load forecasting. The Commission's intent is to increase transparency in the transmission provider's process of forecasting, providing assurance to customers that loads are consistently being forecast using methodologies which are not subject to daily manipulation to favor affiliates.	WEQ 2008 Annual Plan Item 2(b)(v)(4)	**These dates are dependent on NERC providing responses to questions forwarded to NERC by the BPS/ESS/ITS.** FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Voted out of subcommittee for formal comment on March 10, 2008. Approved by the EC via notational ballot on April 23rd. Recommendation was posted for membership ratification on June 23rd. Membership ratification completed on July 23rd.
✔	405	• Business practice standards for posting on OASIS of the "actual daily peak load for the prior day." (Paragraph 405 will not require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(v)(5)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd	Voted out of subcommittee for formal comment on March 10, 2008. Approved by the EC via notational ballot on April

Status[1]	Cite	Order 890 Work Plan			
		Action Item/Work Plan	**Action Item Home**	**Target Dates**	**Status**
				Quarter, 2008	23rd. Recommendation posted for Membership Ratification on June 23rd. Membership ratification completed on July 23rd.
✔		• Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13 (This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development).	WEQ 2008 Annual Plan Item 2 (b)(vi)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS is in the process of coordinating alignment with the NERC ATC Drafting Team. On May 1, 2008, the subcommittee determined no additional standards were required for this work plan item. Posted for formal comments on May 5, 2008. Approved by WEQ EC August 19, 2008.
✔		• Business practice standards to set forth the procedure for input on TTC and ATC methodologies and values. (During the Order 890 NERC and NAESB joint standards development effort, it was determined that the standards contained in MOD003 should be business practice standards instead of reliability standards. NERC has requested that NAESB adopt the standards as business practices via correspondence to Ms. McQuade, NAESB President.) This item will require coordination with the NERC Order 890 reliability standards development because the language to address this item is contained within a draft standard that addresses items that are dependent on NERC deliverables, i.e., the requirements to create an "ATC Information Link" on OASIS. There is no Order 890 cite for this item.	WEQ 2008 Annual Plan Item 2 (b)(vii)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Voted out of subcommittee for formal comment on March 13, 2008. Approved by the EC via notational ballot on May 2, 2008. Membership ratification period closes June 27, 2008. Recommendation was ratified by the membership on June 27, 2008.
✔		Develop any additional business practice standards to support transparency reporting and related functions that may be required as a result of the final order.	WEQ 2008 Annual Plan Item 2(c)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008	The ESS/ITS and BPS continue to review the need for additional business practice standards.

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				RATIFICATION: N/A	The ATC information list was posted for informal comment on January 22, 2008. 05-13-2008 - The BPS/ESS/ITS was directed by the EC to suspend activity on this item. ATC Information List has been assigned to a task force of the EC. Voted out of EC task force for formal comment period ending September 17, 2008. No action recommendation approved by WEQ EC on October 6, 2008.
✔		Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources. (http://www.naesb.org/pdf3/weq_ec051308w2.doc)	WEQ 2008 Annual Plan Item 6(d)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Commissioner Wellinghoff letter Draft recommendation posted for informal comments on June17, 2008 Recommendation was voted out of subcommittee on July 9th. Formal Comment period closes on August 11th. Approved by WEQ EC August 19, 2008. Ratified by the membership on 9/22/2008.

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ESS/ITS ASSIGNMENTS					
		GROUP 0: RESALES			
✔	815, FN 496	The OASIS business practices developed to align the existing NAESB standards with Order 890 will include the requirement that "all sales or assignments of capacity be conducted or otherwise posted on the transmission provider's OASIS on or before the date the reassigned service commences." The OASIS business practices will also conform to Footnote 496 of Order 890. The business practices will include the requirement that the assignee "execute a service agreement directly with the transmission provider." In addition, the business practices will include the requirement that the assignee pay "the transmission provider for service at the negotiated rate and the transmission provider will bill or credit the assignor with any the difference between the negotiated rate and the assignor's original rate. **Order 890-A:** 394. Reforms to the rules governing reassignments and associated reporting obligations also increase our regulatory oversight of the secondary market, allowing the Commission to effectively monitor that market for any attempts to exercise market power. All reassignments must now be conducted through or otherwise posted on OASIS and assignees must execute service agreements prior to the date on which service commences. Transmission providers must provide information regarding reassignments in their EQRs. As noted above, Commission staff will also closely monitor the quarterly reassignment-related data submitted by transmission providers and prepare a report on staff's findings for the Commission's consideration. The Commission takes seriously the possibility that resellers may attempt to exercise market power in the secondary market for transmission capacity. We continue to believe, however, that the regulatory protections in place and our increased oversight of this market will limit the potential for market power abuse during the period in which the price cap is lifted. There is no need for particularized market power studies regarding secondary transmission capacity, as suggested by TAPS. 408. As noted above, the Commission required in Order No. 890 that all sales or assignments of capacity be conducted through or otherwise posted on the transmission provider's OASIS on or before the date the reassignment commences. The Commission thus eliminated the ability of transmission customers to assign transmission rights to another party with subsequent notification to the transmission provider. The Commission also directed transmission providers, working through NAESB, to develop appropriate OASIS functionality to allow such postings. Transmission providers were not required to implement this new OASIS functionality or any related business	WEQ 2007 Annual Plan Item 2(a)(i)	FORMAL COMMENT: Posted for formal comment April 5, 2007 with comments due on May 4, 2007. WEQ EC VOTE: The WEQ Executive Committee adopted a revised recommendation during the May 8, 2007 WEQ EC meeting. RATIFICATION: The recommendation, as revised by the WEQ Executive Committee was posted for member ratification on June 22, 2007 with ballots due on July 23, 2007. The ratification results are posted on the NAESB website.	Completed. The final action is posted on the NAESB WEQ Final Actions page: 2007 WEQ Annual Plan Item 2 Final Action - Recommendation for Revision to Final Action R04006D to align the Resales Standards with Order 890 The Subcommittee believes the final action conforms with Order 890-A.

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		practices until NAESB develops appropriate standards. 422. The Commission affirms the decision in Order No. 890 to require assignees to execute a service agreement with the transmission provider governing reassignments of transmission capacity prior to scheduling use of that capacity. We provide clarification of this requirement, however, in response to the concerns raised by petitioners. In Order No. 890, the Commission required that all reassignments be accomplished by the assignee executing a service agreement with the transmission provider that will govern the provision of reassigned service. The Commission did not intend to impose contracting obligations that are more onerous than the acquisition of primary transmission capacity, which may be accomplished through execution of a service agreement followed by scheduling on OASIS. We clarify that it is equally sufficient for an assignee to execute a service agreement governing its reassignments of capacity generally and to complete a particular assignment through the OASIS. However, as with reservations of primary transmission capacity, there remains a threshold requirement to execute a service agreement with the transmission provider in order to commit the assignee to abide by the terms and conditions of the transmission provider's OATT governing the reassignment of transmission service. 423. It would not be appropriate to relieve assignees of the obligation to execute a service agreement with the transmission provider since such agreements establish the necessary contractual relationship between the assignee and the transmission provider. As we explain above, sales of reassigned capacity now take place under the transmission provider's OATT and, thus, there must be a contractual relationship between these parties. This does not mean, however, that all of the terms and conditions of a particular assignment must be stated in the service agreement. Like short-term firm and non-firm reservations of primary capacity, the transmission provider and assignee may rely on OASIS to provide information regarding the reseller, quantity, and price associated with a particular reassignment of service. This information would then become part of the binding agreement between the transmission provider and assignee governing the assignment, just as confirmation of short-term firm and non-firm transactions on OASIS constitute binding contractual commitments. Because execution of a service agreement with the transmission provider governing reassignments of capacity is a threshold requirement for an assignee wishing to accomplish a particular reassignment on OASIS, Bonneville's concern regarding the failure of an assignee to return its service agreement is misplaced. The assignee in that instance would have no right to schedule a reassignment on OASIS since it has not first executed the appropriate service agreement with the transmission provider. 424. Some of the confusion regarding these contracting requirements may have been caused by the Commission's reference in section 23.1 of the revised pro forma OATT to			

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		a service agreement "that will govern the provision of reassigned service," which could be interpreted to refer to transaction-by-transaction service agreements for reassignments. Inclusion of the words "Long-Term Firm" in both the title of the form of service agreement and the attached specifications in the new Attachment A-1 to the pro forma OATT adopted in Order No. 890 may have added to the confusion by potentially implying that use of the service agreement is limited to long-term firm point-to-point transactions instead of also applying to short-term firm point-to-point and non-firm point-to-point reassignments, as intended by the Commission. We revise section 23.1 of the pro forma OATT and the title of Attachment A-1 to make clear that use of the form of service agreement for reassigned capacity, and associated posting of schedules and transaction information on OASIS, should be similar to the use of such agreements for primary capacity. 425. The execution of a service agreement by the assignee does not itself terminate the reseller's service agreement, as EEI argues. The reseller's service agreement remains in place, granting the reseller scheduling rights for the reserved capacity and obligating the reseller to pay for that reservation. During the term of the assignment, the reseller will continue to be billed under its agreement with the transmission provider. The assignment of service simply transfers to the assignee some or all of the reseller's scheduling rights for the period of the reassignment and, in return, obligates the assignee to pay the transmission provider the negotiated rate. In order to prevent over-recovery by the transmission provider, the transmission provider must therefore credit the reseller the reassignment rate, which leaves the reseller with the net difference between the resale rate and the reseller's original rate. If the assignee defaults and fails to pay for the reassigned capacity, the transmission provider should reverse the credit to the reseller to reflect the lack of payment by the assignee. 426. We disagree that these billing requirements are unduly burdensome. While it is true that the transmission provider may be required to bill at different rates, that is already the case under the pro forma OATT. Transmission providers are permitted to offer discounts from the rates stated in their OATT, provided they offer such discounts to all eligible customers. Offering discounts thus creates different rates for different customers depending on when they negotiate service. The transmission provider therefore should already have mechanisms in place to bill customers based on rates other than those stated in its OATT. In any event, the need to bill assignees directly for reassignments is inextricably linked to the decision to require that all reassignment transactions take place pursuant to the rate on file in the transmission provider's OATT, rather than bilateral agreements between customers. We therefore do not intend for the discount rule or the price ceilings otherwise stated in the transmission provider's OATT to apply to reassignments of capacity. We have revised schedules 7 and 8 of the pro			

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		forma OATT accordingly. 427. We clarify that, to the extent necessary, the costs incurred by the transmission provider to account and bill for reassignments of transmission capacity should be included in the transmission provider's cost of service, just like accounting and billing costs for any other service under the transmission provider's OATT. We decline MidAmerican's request to prohibit further assignments of reassigned capacity. Order No. 888 allowed for multiple reassignments under the pro forma OATT and MidAmerican does not justify departing from this practice. Just as the original transmission customer may find that it has excess capacity it can reassign, so may an assignee. Denying the assignee's right to further assign its scheduling rights would inhibit customers who value the capacity most from accessing it and thereby contradict the Commission goal of creating a competitive secondary market for transmission capacity. 428. With regard to OASIS modifications necessary to allow for the reassignment of transmission capacity, the Commission in Order No. 890 already directed transmission providers working through NAESB to develop appropriate OASIS functionality to allow for reassignment-related postings. We understand that this work is on-going and expect any necessary modifications to NAESB's business practices that are necessary to reflect our rulings in this order will be adopted prior to the submission of those standards for Commission review. In the interim, transmission providers should identify in their business practices any procedures necessary to accomplish the reassignment of capacity by their customers.			
		GROUP 1: ANNOTATIONS FOR ATC; LOAD FORECAST AND ACTUAL LOAD; RE-BID OF PARTIAL SERVICE; PRECONFIRMATION PRIORITY; and CONDITIONAL FIRM			
		Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority S&CP Requirements	WEQ 2008 Annual Plan Item 2(a)(i)(1)	FORMAL COMMENT: Sent during the 3rd Quarter 2007. WEQ EC VOTE: EC notational ballot due January 16, 2008. RATIFICATION: The ratification of the Recommendation will be completed during 1st Quarter 2008.	**Split into individual items – see below**
✔	1078	**Conditional Firm:** In Paragraph 1078 of Order 890, the Commission directed transmission providers to "assign short-term firm service to conditional firm customers as the service becomes available." The Commission also directed transmission providers to work with NAESB to "develop the appropriate communications protocols to implement this attribute of conditional firm service." NAESB will develop OASIS	WEQ 2008 Annual Plan Item 2(a)(i)(2)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Initial working paper of draft requirements to be posted in April 2008. On April 4, 2008, the

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		business practices (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1))that will implement the ability to assign short-term firm service to conditional firm customers. Development of communication protocols for conditional firm including tracking mechanism and regional variation. Need to review the tagging rules related to the use of conditional firm. **Order 890-A:** 566. During non-conditional periods, conditional firm service is subject to pro rata curtailment consistent with curtailment of any other long-term firm service. During the hours or specific system conditions when conditional firm service is conditional, conditional firm service share the same curtailment priority as secondary network service. In such circumstances, transmission providers will be allowed to curtail only for reliability reasons and conditional firm customers during conditional curtailment hours will be curtailed only after all point-to-point non-firm customers have been curtailed. If the customer selects the annual hourly cap option, the transmission provider will have the flexibility to conditionally curtail the customer for any reliability reason during those hours, including but not limited to, the system condition(s) identified in the system impact study. 567. The Commission provided that short-term firm service reserved prior to the reservation of conditional firm service will maintain priority over conditional firm service in the periods when conditional firm service is conditional, i.e., when specified system conditions exist or conditional curtailment hours apply. Transmission providers were directed to work with NAESB to develop the appropriate communications protocol to allow for automatic assignment of short-term firm point-to-point service to conditional firm customers to the extent short-term service becomes available. Transmission providers need not implement this requirement until NAESB develops appropriate communications protocols. 569. Finally, the Commission recognized that there may be some regional variation in the way transmission providers approach the provision of conditional firm service beyond the minimum attributes that established in Order No. 890. The Commission directed transmission providers located in the same region to coordinate among themselves to develop business practices for implementation of the conditional firm service. In order to allow time for this regional coordination, the Commission directed transmission providers to implement these mechanisms and business practices within 180 days after the publication of this Final Rule in the Federal Register, or October 11, 2007. 585. We also agree with MidAmerican that a transmission provider's waiver of a			ESS/ITS voted to send this recommendation out for informal comments due April 11, 2008. Voted out of subcommittee for formal comment on June 24, 2008. Recommendation posted for 30-day formal comment period on June 25th. Approved by WEQ EC on August 8, 2008 Ratified by the membership on 9/25/2008.

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		reassessment for conditional firm or planning redispatch service does not constitute a waiver of all reassessments for the duration of the service, unless explicitly agreed to by the transmission provider. We reiterate, however, that only one reassessment may be performed in each two-year period of service. We also affirm that any waiver must be granted for similarly situated service, which would include conditional firm or planning redispatch service that is limited because of the same constraints or general system limitations. Such a waiver would be an act of discretion that must be posted on OASIS. Waiver of the reassessment presents an opportunity for discrimination among classes of customers on the part of the transmission provider and posting will provide eligible customers with an indicator of how often conditions or redispatch requirements have been reassessed. Transmission providers are directed to develop uniform OASIS posting standards, in coordination with NAESB, for transmission providers to post information regarding waivers of the biennial reassessment for planning redispatch and conditional firm service.			
✔	369	**Annotations for ATC:** OASIS Business Practice Standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) that will "require that the transmission provider post a brief, but specific, narrative explanation of the reason for a change in monthly and yearly ATC values on a constrained path." The posting requirements will include posting of "(1) specific events which gave rise to the change and (2) new values for ATC on that path (as opposed to all points on the network)."	WEQ 2008 Annual Plan Item 2(a)(i)(3)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Assigned to BPS/ESS/ITS (see above BPS/ESS/ITS item that reference WEQ 2008 AP Item 2(b)(v)(3)). Voted out of subcommittee for formal comment on February 13, 2008. Approved by the EC via notational ballot on April 14th. Membership ratification to be completed by May 16th. Ratified by the membership on 5/16/2008.
✔	416	**Load Forecast and Actual Load:** OASIS Business Practice Standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) for the posting of "load forecasts and actual daily peak load for both system-wide load (including native load) and native load." **Order 890-B:** 35. We clarify, however, that the Commission intended for transmission providers to post the underlying factors used to make load forecasts that have a significant impact on calculations, such as temperature forecasts, not all economic and other data that	WEQ 2008 Annual Plan Item 2(a)(i)(4)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Assigned to BPS/ESS/ITS (see above BPS/ESS/ITS item that reference WEQ 2008 AP Items 2(b)(v)(4) and (5)). Voted out of subcommittee for formal comment on March 10, 2008.

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		underlies each and every daily load forecast. Transmission providers must post a description of their load forecast method including how economic and weather assumptions are used in load forecasting. The Commission's intent is to increase transparency in the transmission provider's process of forecasting, providing assurance to customers that loads are consistently being forecast using methodologies which are not subject to daily manipulation to favor affiliates.			Approved by the EC via notational ballot on April 23rd. Membership ratification completed on July 23rd.
✔	1378	**Re-bid of Partial Service:** OASIS Business practice standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) for re-bid of partial service across a single Transmission Provider's system.	WEQ 2008 Annual Plan Item 2(a)(i)(5)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May 13. Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership on June 23rd
✔	1392, 1401	**Pre-confirmation Priority:** Development of OASIS business practice standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) to prohibit "transmission customers from changing a request into a pre-confirmed request and requiring OASIS platforms to be accessible on non-Windows/Explorer computers." **Pre-confirmation Priority:** Development of OASIS Business Practice Standards and OASIS S&CPs so that "pre-confirmed non-firm point-to-point transmission service requests and short-term firm point-to-point transmission service requests" have priority though "longer duration requests for transmission service will continue to have priority over shorter duration requests for transmission service." The standards will be written such that pre-confirmation will serve as a "tie-breaker" when the requests are of equal duration.	WEQ 2008 Annual Plan Item 2(a)(i)(6)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May 13. Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership on June 23rd.
✔		Appendix C – OASIS Exemptions	WEQ 2008 Annual Plan Item 2(a)(i)(7)	FORMAL COMMENT: **Voted out of subcommittee 12/17/2007. Formal Comment period 12/19/2007 through 1/19/2008.** WEQ EC VOTE: Approved February 4, 2008 RATIFICATION: Ratification	Ratified by the membership on 3/13/2008.

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				period to close 3/13/2008	
		GROUP 2: METRICS; REDISPATCH COST POSTING			
✔	413	**Metrics:** Business Practice standards s to "post on OASIS metrics related to the provision of transmission service under the OATT" including the posting of: • "the number of affiliate versus non-affiliate requests for transmission service that have been rejected"; • "the number for affiliate versus non-affiliate requests for transmission service that have been made"; These standards will also set forth in the above referenced posting requirements the length of the service request and the type of the service requested.	WEQ 2008 Annual Plan Item 2(a)(ii)(1)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May 13. Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership on June 23rd
✔	1318	**Metrics:** OASIS business practice standards to implement the standard performance (planning study) metrics set forth in Order 890, Paragraphs 1308-1317.	WEQ 2008 Annual Plan Item 2(a)(ii)(2)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May 13. Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership on June 23rd
✔	1162	**Redispatch Cost Posting:** Business practices for redispatch cost postings: • The posting of redispatch information will also include the posting of each transmission provider's "monthly average cost of redispatch for each internal congested transmission facility or interface over which it provides redispatch service using planning redispatch or reliability redispatch under the pro forma OATT." • The business practice standards for redispatch cost postings will also include functionality for transmission providers to post "a high and low redispatch for the month" each internal congested transmission facility or interface over which it provides redispatch service.	WEQ 2008 Annual Plan Item 2(a)(ii)(3)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	Voted out of subcommittee for formal comment on 2/12/2008. WEQ EC adopted the recommendation on May 13. Membership ratification to be completed by June 23rd. Recommendation was ratified by the membership

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		Order 890-A: 621. Transmission providers must post internal constraint or interface data for the month if any planning redispatch or reliability redispatch is provided during the month, regardless of whether the transmission customer is required to reimburse the transmission provider for those exact costs. Thus, if the transmission customer pays for planning redispatch pursuant to a negotiated fixed rate, the transmission provider is required to post and calculate the monthly average redispatch costs and the high and low costs in the month even though the transmission provider will bill the customer the fixed rate. The same posting requirement applies if the customer is paying a monthly "higher of" rate. The Commission concluded that the relevant reliability redispatch costs for posting purposes are those costs the transmission provider invoices network customers based on a load ratio share pursuant to section 33.3 of the pro forma OATT. The transmission provider must post this data on OASIS as soon as practical after the end of each month, but no later than when it sends invoices to transmission customers for redispatch-related services. The Commission directed transmission providers to work in conjunction with NAESB to develop this new OASIS functionality and any necessary business practice standards.			on June 23rd
		GROUP 3: NETWORK SERVICE ON OASIS			
I	385	Development of OASIS business practice standards and OASIS S&CPs for "transmission providers and network customers to use OASIS to request designation of new network resources and to terminate designation of network resources." Shall be posted on OASIS for 90 days and available for audit for a 5 year period.	WEQ 2009 Annual Plan Item 2(a)(i)(1) See also WEQ 2009 Annual Plan items 2(b)(i)(1) and 3(a)(i)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Concept Paper posted 11/7/2007. Concepts discussions continued 1st Quarter 2009.
I	385	The standards will include the ability to electronically query requests to designate and terminate network resources and will require development of OASIS templates and to allow for queries of all information provided with designation requests. **Order 890-B:** 209. We also conclude that concerns regarding the ability to verify or monitor the buyer's decision to designate a purchase of system power as a network resource are overstated in light of the clarification that the buyer and seller must be on the same transmission system. In Order No. 890, the Commission directed transmission providers, working through NERC, to develop OASIS functionality for the designation of network resources and for queries of information provided with designation requests.	WEQ 2009 Annual Plan Item 2(a)(i)(2) See also WEQ 2009 Annual Plan items 2(b)(i)(1) and 3(a)(i)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Concept Paper posted 11/7/2007. Concepts discussions continued 1st Quarter 2009.

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		Parties to a sale of system power on the same transmission system will therefore have ready access to the treatment of the resource. Sellers also may rely on commitments made by the buyer to designate the purchase as a network resource.			
I	1477	The standards will include the ability to mask information "about operating restrictions and generating cost on OASIS"	WEQ 2009 Annual Plan Item 2(a)(i)(3) See also WEQ 2009 Annual Plan items 2(b)(i)(1) and 3(a)(i)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Concept Paper posted 11/7/2007. Concepts discussions continued 1st Quarter 2009.
I	1477	Development of OASIS business practice standards and OASIS S&CPs that describe the procedural requirements for submitting designations over any new OASIS functionality. **Order 890-A:** 919. The Commission clarifies, in response to South Carolina E&G's request, that the language in paragraph 1521 of Order No. 890 is only meant to be a paraphrase of the more detailed attestation to be provided in the pro forma OATT itself. A network customer designating network resources should submit an attestation using the language set forth in sections 29.2(viii) and 30.2 of the pro forma OATT, as amended in Order No. 890, not the language of the preamble. A network customer is not permitted to merely reference the applicable section of the pro forma OATT when completing the attestation requirement. If the OASIS customer comment section does not currently allow enough space for a network customer to provide its attestation, transmission providers should modify, in coordination with NAESB, OASIS functionality to accommodate the full attestation. In the interim, the transmission provider should identify alternate means, such as by telefax or e-mail, for the network customer to provide the attestation.	WEQ 2009 Annual Plan Item 2(a)(i)(4) See also WEQ 2009 Annual Plan items 2(b)(i)(1) and 3(a)(i)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Concept Paper posted 11/7/2007. Concepts discussions continued 1st Quarter 2009.
I	1504	Development of OASIS business practice standards and OASIS S&CPs to specify how designated network service informational postings are posted on OASIS . Develop details of how the view, download, and query requirements for information posted regarding network resource designations informational postings.	WEQ 2009 Annual Plan Item 2(a)(i)(5) See also WEQ 2009 Annual Plan items 2(b)(i)(1) and 3(a)(i)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Concept Paper posted 11/7/2007. Concepts discussions continued 1st Quarter 2009.

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I	1532	Development of OASIS business practice standards and OASIS S&CPs to set forth the "treatment of OASIS requests when the customer fails to provide the necessary attestation," when submitting a request to designate a new network resource. Attestation: Formatting of attestation information that will be provided on OASIS. **Order 890-B:** 182. The Commission grants rehearing to more accurately state the requirement to provide an attestation supporting the designation of network resources pursuant to sections 29.2(viii) and 30.2 of the pro forma OATT. In order to designate a network resource, section 30.7 of the Order No. 888 pro forma OATT required each network customer to demonstrate that (i) it owns or has committed to purchase generation pursuant to an executed contract or (ii) execution of a contract is contingent upon the availability of transmission service in order to designate a generating resource. In Order No. 890, the Commission adopted the attestation requirement as the means by which the network customer can make this demonstration, revising sections 29.2 and 30.2 accordingly. We affirm this requirement, consistent with the network customer's obligations under section 30.7, and grant rehearing of the Commission's statements in this proceeding indicating that the attestation can instead be submitted at the time a resource designation is confirmed, rather than requested. 183. We disagree with NRECA and TDU Systems that a customer submitting an attestation pursuant to section 29.2(viii) or 30.2 of the pro forma OATT must commit to purchase the resources for which designation is requested irrespective of the outcome of the network service request. Consistent with section 30.7, a network customer may attest that execution of a contract is contingent upon the availability of transmission service under Part III of the pro forma OATT. Network customers are therefore not required to commit to purchasing a resource prior to submitting a request to designate that resource.	WEQ 2009 Annual Plan Item 2(a)(i)(6) See also WEQ 2009 Annual Plan items 2(b)(i)(1) and 3(a)(i)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Concept Paper posted 11/7/2007. Concepts discussions continued 1st Quarter 2009.
I	1541	Development of OASIS business practice standards and OASIS S&CPs to describe "the procedural requirements for submitting both temporary and indefinite terminations of network resources, to allow network customers to provide all required information for such terminations." These business practice standards will include the functionality set forth in Order 890, Paragraph 1541.	WEQ 2009 Annual Plan Item 2(a)(i)(7) See also WEQ 2009 Annual Plan items 2(b)(i)(1) and 3(a)(i)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Concept Paper posted 11/7/2007. Concepts discussions continued 1st Quarter 2009.
I	1541	Development of OASIS business practice standards and OASIS S&CPs to describe "the procedures for submitting and processing requests for concomitant evaluations of	WEQ 2009 Annual Plan	FORMAL COMMENT: 4th Quarter, 2009	Concept Paper posted 11/7/2007.

		Order 890 Work Plan			
	Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
		transmission requests and temporary terminations. **Order 890-B:** 188. In Order No. 890, the Commission directed transmission providers to evaluate as a single request a request for temporary undesignation and related requests for transmission service. Transmission providers were therefore directed to develop, working through NAESB, business practices allowing for electronic identification of related transmission service requests to be evaluated concomitantly with the request for temporary undesignation. This was appropriate in light of the Commission's decision to allow network customers to temporarily undesignate their network resources without forfeiting the right to use the resource at a specified point in the future, provided they pair the temporary undesignation with a request to redesignate the resource. 189. We find that similar procedures for permanent undesignations of network resources are unnecessary given the transmission provider's obligation to consider clustering transmission service requests at the request of customers. If a network customer or the transmission provider's merchant function wishes for the transmission provider to take into consideration the effect of a request to terminate a network resource on a concomitant request to designate another network resource, it may request the transmission provider to cluster the requests. As TranServ acknowledges, this will not alter the priority of the network customer or the transmission provider's merchant function with regard to any ATC that may be made available by undesignating the network resource.	Item 2(a)(i)(8) See also WEQ 2009 Annual Plan items 2(b)(i)(1) and 3(a)(i)	WEQ EC VOTE: 2010 RATIFICATION: 2010	Concepts discussions continued 1st Quarter 2009.
		GROUP 4: PRE-EMPTION; REQUEST R05019; and REVISIONS TO STANDARD 9.7			
N S	1407	**Pre-emption:** Revise OASIS business practice standards and OASIS S&CPs so that "a new pre-confirmed request for transmission service would preempt a request of equal duration that has been accepted by the transmission provider but not yet confirmed by the transmission customer." It is the expectation that the business practice standards to address preemption will be developed in conjunction with NAESB Request No. R05019 to modify OASIS standards and OASIS S&CPs to clearly document the procedures used to implement the displacement/interruption terms of the Pro Forma tariff. This is consistent with NAESB Standard WEQ 001-4.25. **Order 890-A:** 814. The Commission affirms the decision in Order No. 890 not to change the "first-come, first served" nature of the reservation process and the right of first refusal. These policies have worked well in the past and, as we explain in Order No. 890, benefit transmission providers and customers alike by facilitating the administration of the reservation process and removing confusion about how to comply.	WEQ 2009 Annual Plan Item 2(a)(ii)(1)	**REQUEST FOR RECONSIDERATION PENDING AT FERC MAY IMPACT TARGET DATES.** FORMAL COMMENT:4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Not Started

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		815. We disagree with Duke and TranServ that the right of first refusal policies should be revised based on complex hypotheticals involving the preemption of multiple short-term reservations. The complexities pointed to by these commenters do not by themselves warrant changing the right of first refusal rule. Even though we recognize the potential for complexities to arise under the right of first refusal rule, we believe them to be relatively limited. In the off-chance that multiple eligible customers with short-term reservations choose to exercise their right of first refusal for the same capacity simultaneously, the Commission believes that they should have a right to do so. 816. We therefore decline to expand upon the language of the pro forma OATT to account for every factual scenario that could arise under sections 13.2 and 14.2 of the pro forma OATT. Sections 13.2 and 14.2 of the pro forma OATT set forth adequate guidance for transmission providers to fairly administer competing requests, including the priorities for determining which reservations or requests trump one another as well as the timeframes for eligible customers to respond to competing requests. As noted above, we recognize that certain unique cases can present difficult allocation issues, but conclude that these extreme cases arise infrequently in the normal course of business. In the vast majority of cases, we believe the right of first refusal rules are efficient and easy to administer without further amending the governing tariff language, as Bonneville and Southern suggest. 817. To the extent necessary, the Commission clarifies that a "competing request" under sections 13.2 and 14.2 of the pro forma OATT may include a transmission service request that overlaps with only part of another existing transmission service reservation since both requests cannot be granted simultaneously. Accordingly, a "competing request" for purposes of sections 13.2 and 14.2 may also include a transmission service request for which transmission capacity cannot be accommodated without preempting one or more existing transmission reservations of parts thereof. 818. In response to TranServ and Duke, we clarify that sections 13.2 and 14.2 allow an eligible customer to retain its original reservation by matching the competing service request's cost or duration terms exactly or by exceeding one or more of the terms of a competing transmission service request. Since any "match" by an eligible customer in response to a potentially preempting request, by definition, either exceeds the costs, duration or both of the eligible customer's original reservation, we do not believe eligible customers opting to match a competing request have a strong incentive, if any, to "match" a competing request with terms that exceed the competing request. Nevertheless, we do not see any harm resulting from a match that exceeds the exact terms of a competing request and therefore believe it would not be appropriate to preclude the ability of eligible customers to make such a request. 819. With regard to reassignments of capacity in the secondary market, we clarify that			

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	Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
		the associated right of first refusal under sections 13.2 and 14.2 of the pro forma OATT to match a competing transmission service request applies to the primary transmission service, not the reassignment of scheduling rights. Using TranServ's example, the reassignment of one day of a customer's weekly service would not cause the assignor or the assignee to match a competing three day request for service since the initial one week reservation already exceeded the competing request. The fact that one day of service has been reassigned does not alter the assignor's entitlement to use service for the remaining week reserved. **Order 890-B:** 161. The Commission declines to address in this rulemaking proceeding how transmission providers should resolve complicated and fact-specific scenarios such as the cascading rights of first refusal described by Duke. Sections 13.2 and 14.2 of the pro forma OATT provide adequate guidance for transmission providers to fairly administer the vast majority of competing requests, including priorities for determining which reservations or requests trump one another as well as the timeframes for eligible customers to respond to competing requests. As the Commission explained in Order No. 890-A, we expect that more complex circumstances such as those suggested by Duke will be relatively limited and, therefore, are best addressed on a case-by-case basis. Transmission providers remain free, however, to develop through the NAESB process standard procedures for processing complicated request scenarios.			
N S		**NAESB Request No. R05019:** During the work to address FERC Order 890, the ESS/ITS will also use the opportunity to modify OASIS standards and S&CP to clearly document the procedures used to implement the displacement/interruption terms of the Pro Forma tariff as requested in NAESB Request No. R05019	WEQ 2009 Annual Plan Item 2(a)(ii)(2) See also WEQ 2009 Annual Plan Item 3(a)(iii)	**REQUEST FOR RECONSIDERATION PENDING AT FERC MAY IMPACT TARGET DATES.** FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Not Started
C	1269	**Revisions to Standard 001-9.7:** NAESB will continue to work to revise NAESB WEQ business practice standard WEQ 001-9.7 (which addresses rollover rights for Redirected transmission service) to be consistent with the Commission's policies. **Order 890-A:** 697. Pursuant to Section 22 of the pro forma OATT, a transmission customer taking firm point-to-point service may modify its receipt and delivery points, i.e., redirect its service, on either a non-firm or firm basis. In Order No. 676, the Commission adopted the "Standards for Business Practices and Communication Protocols for Public Utilities"	WEQ 2009 Annual Plan Item 2(a)(ii)(3)	FORMAL COMMENT: 1st Quarter, 2009 WEQ EC VOTE:2nd Quarter, 2009 RATIFICATION: 2nd Quarter, 2009	On February 11-12, 2008, the ESS/ITS voted to send this recommendation out for informal comments due March 25, 2008. November 4, 2008 WEQ EC Task Force created January 8, 2009 EC Task

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		developed by the NAESB's Wholesale Electric Quadrant (WEQ). The WEQ standards include standards addressing requirements for redirects on both a firm and non-firm basis, all of which were incorporated by reference into the Commission's regulations except for WEQ Standard 001-9.7, which addressed the impact of redirects on the rollover rights of a long-term transmission customer. Order No. 676 directed the WEQ to reconsider WEQ Standard 001-9.7 and develop a revised standard consistent with Commission policy. 698. In Order No. 890, the Commission affirmed reliance on the NAESB process to develop business practices implementing the Commission's redirect policy. The Commission also determined that the reforms adopted in Order No. 676, in combination with the OATT-related reforms adopted in this proceeding, were adequate to ensure that transmission providers do not engage in undue discrimination when a customer seeks to modify its receipt and delivery points on a firm basis. With respect to the effect of redirects on rollover rights, the Commission affirmed its policy allowing a redirect of firm, long-term service to retain rollover rights, even if the redirect is requested for a shorter period. The Commission concluded that a transmission customer should not have to choose between maintaining its rollover rights and redirecting on a firm basis. The Commission noted, however, that any change to a delivery point would be treated as a new request for service for purposes of determining availability of capacity. As a result, a redirect right does not grant the customer access to system capacity or queue position different from other customers submitting new requests for service. The Commission also provided guidance regarding the processing of, and pricing for, redirected service. 700. If the Commission decides to maintain rollover rights for redirects, MISO proposes the following limitations and requests the Commission to direct NAESB to draft its business practices accordingly. First, MISO suggests that the primary path agreement should have a term of at least five years for any rollover rights to attach. Second, MISO requests that any redirect must be for firm service for one year or longer. If the redirect is for a shorter period, MISO contends that the rollover rights should remain with the original path. Third, MISO requests redirected service to terminate on the same date as the parent service so as to maintain the timing for execution of rollover rights. Finally, MISO suggests that in order to execute a rollover right the redirected service must be requested and granted prior to the one-year deadline for the customer to request rollovers along the original path. 702. TranServ also requests clarification regarding the requirement for the rollover right to follow the redirect, regardless of the duration of the redirect. TranServ questions whether a redirect of a long-term firm service reservation for one day qualifies that customer for rollover rights on the redirected service points. TranServ suggests that the			Force conference call with FERC Staff February 3, 2009 WEQ EC remanded to ESS-ITS February 4, 2009 ESS-ITS began reconsidering.

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		Commission instead restrict rollover rights on redirected service points to redirects of five years or longer and further require that the redirect be co-terminus with the original request being redirected. TranServ argues that more guidance regarding implementation of the rollover and redirect policies will facilitate the NAESB standards development process. 704. The Commission denies petitioners' requests to amend the rights of rollover customers to redirect their service. Under section 22.2 of the pro forma OATT, a request for a firm redirect must be treated like a request for new transmission service. As a new request for service, each redirect request is subject to the availability of capacity and subject to the possibility that the transmission provider may not be able to provide rollover rights on the new redirected path. The transmission provider is required to offer rollover rights to a customer requesting a firm redirect only if rollover rights are available on the redirected path, i.e., to the extent not restricted based on reasonable forecasts of native load growth or preexisting contracts that commence in the future. 705. As the Commission explained in Order No. 890, rollover rights follow the redirect regardless of the duration of the redirect. A transmission customer making a firm redirect request does not convert its original long-term firm transmission service agreement into two short-term service agreements, nor does it lose its rollover rights under its long-term firm transmission service agreement. At the same time, a customer can exercise its rollover right only at the end of the contract. Thus, if a customer with rollover rights chooses to redirect its capacity for less than the full remaining term of the contract, absent some further request to redirect, the original path will automatically be reinstated and rollover rights would remain on only the original path. By contrast, if the customer chooses to redirect its capacity until the end of its contract, the customer would have rollover rights along only the redirected path, and only to the extent not restricted based on native load growth or future contracts along the redirected path. 706. We therefore reject requests to restrict rollover rights to longer-term redirects. A long-term transmission customer may request multiple, successive redirects for firm service. This discretion is limited by the fact that each successive request is treated as a new request for service in accordance with section 17 of the pro forma OATT. Each request is therefore subject to the availability of capacity and subject to the possibility that the transmission provider may not be able to provide rollover rights on the new, redirected path. If the customer has not been granted rollover rights for a redirect that extends to the end of its contract, the redirected service will terminate on the same date as the parent service. 707. We also reiterate that a customer cannot exercise any rollover rights unless it first has provided the appropriate notice to the transmission provider. If a customer requests and is granted a rollover right prior to the relevant notice deadline (60 days for pre-Order			

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		No. 890 agreements or one year for all others) and subsequently requests and is granted a redirect for firm service for the remainder of the contract term (i.e., within the notice period), the new reservation governs the rights at the new receipt and delivery points and the customer can obtain rollover rights with respect to the redirected capacity to the extent rollover rights are available for the redirected points. If, however, a customer fails to request a rollover right prior to the relevant notice deadline, the customer forfeits rollover rights along the current or any redirected path. 708. We clarify, to the extent necessary, that transfer capability is not freed up for earlier queued service requests until a redirect has been granted. A redirect request must be evaluated in accordance with section 17 of the pro forma OATT using the same system assumptions and analysis applicable to any other new request for service, including whether sufficient ATC exists to accommodate the request. If there is insufficient ATC to offer service to customers in the queue, and an existing customer requests redirected service, any increase in ATC along the original path is contingent upon the acceptance and confirmation of the redirect. It cannot be assumed at the time of a redirect request that the transmission provider will grant the request.			
		GROUP 5: PARAGRAPH 1377			
N S	1377	NAESB will develop business practice standards to facilitate the coordination of requests across multiple transmission systems using the principles set forth in Paragraph 1377 of Order 890. Develop S&CPs related to coordination of request across multiple transmission systems. **Order 890-A:** 762. The Commission also required transmission providers working through NAESB to develop business practice standards to better coordinate transmission requests across multiple transmission systems. In order to provide guidance to NAESB, the Commission articulated the principles that should govern processing across multiple systems. The Commission further required transmission providers working through NAESB to develop business practice standards to allow a transmission customer to rebid a counteroffer of partial service so the transmission customer can take the same quantity of service for linked transmission service requests across multiple systems. The Commission explained that the transmission customer should not be required to take the same quantity of service across consecutive transmission service requests and, instead, it should simply have the option to do so. 766. The Commission affirms the decision in Order No. 890 to rely on the NAESB process to develop business practices to govern the processing of transmission requests across multiple transmission systems. We decline to dictate at this time, beyond those	WEQ 2009 Annual Plan Item 2(a)(iii)(1)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Not Started

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		principles outlined in Order No. 890, the particular practices that must be implemented. It is more appropriate to allow transmission providers working through NAESB, in the first instance, to consider how best to ensure coordination across multiple systems. It is also appropriate to give NAESB an open timeframe to develop these standards since they must be broad enough to account for the complexities of coordinating multi-system transmission service requests.			
N S	1378	**Re-bid of Partial Service:** OASIS Business practice standards for re-bid of partial service across multiple Transmission Providers' systems. NAESB will develop business practice standards to "allow a transmission customer to rebid a counteroffer of partial service so the transmission customer is allowed to take the same quantity of service across all linked transmission service requests.	WEQ 2008 Annual Plan Item 2(a)(iii)(2)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Not Started
		GROUP 6: MISCELLANEOUS			
N S	1390	NAESB plans to review the existing business functions set forth in the NAESB WEQ standards to determine if changes should be made to address Paragraph 1390 of Order 890. FERC: OATT is sufficient to allow a Transmission Provider to manage situations where the Transmission Customer modifies its application for service to the point that the request is "meaningfully different" than initial request. ESS/ITS: need to review if this has any impact on business functions.	WEQ 2008 Annual Plan Item 2(a)(iv)(1)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Not Started
N S	1627	Development of OASIS business practice standards and OASIS S&CPs for "the posting of additional curtailment information on OASIS" via a "detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. Posting of curtailment information on OASIS: develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. **Order 890-A:** 973. The Commission did not propose in the NOPR, or adopt in Order No. 890, any changes to the terms and conditions under which a transmission provider may curtail service to maintain reliable operation of the grid, as set forth in sections 13.6 and 14.7 for point-to-point service and section 33 for network service. The Commission did, however, conclude that the posting of additional curtailment information is necessary to provide transparency and allow customers to determine whether they have been treated in the same manner as other transmission system users, including customers of the transmission provider. Accordingly, the Commission required transmission providers, working through NAESB, to develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments, including all	WEQ 2008 Annual Plan Item 2(a)(iv)(2)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Not Started

		Order 890 Work Plan			
	Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
		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.			
	1005	**Redispatch Cost Posting:** Business practices for redispatch cost postings: The business practice standards for redispatch cost postings will include OASIS business practices and any needed additions or revisions to the OASIS Standards & Communication Protocols (S&CPs) to allow for posting of third party offers of planning redispatch services. The business practice standards developed for redispatch cost postings may affect the existing NAESB business practice standards for Transmission Loading Relief. (moved from Group 2) **Order 890-A:** 568. Transmission providers also were directed to work with customers to facilitate the use of third party generation, where available, in provision of planning redispatch. To facilitate provision of redispatch service by third parties, the Commission further directed transmission providers, working through NAESB, to modify their OASIS sites and develop any necessary business practices to allow for posting of third party offers to provide planning redispatch. Again, transmission providers were not required to implement the new OASIS functionality and any related business practices until NAESB develops appropriate standards. **Order 890-B:** 131. In Order No. 890, the Commission directed transmission providers to modify their OASIS sites to allow for posting of third-party offers for planning redispatch and to work with NAESB to develop the OASIS functionality and any necessary business practice standards to allow for third-party planning redispatch. The Commission noted that provision of third party planning redispatch required coordination between the customer, transmission provider and reliability coordinator, but determined that the customer bears the burden to ensure that the necessary contractual and technical arrangements are in place to maintain reliability.	WEQ 2008 Annual Plan Item 2(a)(iv)(3)	FORMAL COMMENT: 4th Quarter, 2009 WEQ EC VOTE: 2010 RATIFICATION: 2010	Not Started
✔	243-244	**Posting of ETC:** OASIS business practice standards and S&CPs necessary to implement the Business Practice Standards developed to complement NERC Reliability Standards for **Existing Transmission Commitment (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard. (moved from Group 1)* *Requirements for a "consistent approach for determining the amount of transfer	WEQ 2008 Annual Plan Item 2(a)(vi)(4) and 2(a)(iv)(4)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Started May 15, 2008. Task has been reassigned to BPS/ESS/ITS. Recommendation was voted out of subcommittee on June 17, 2008. Formal comment period

		Order 890 Work Plan			
	Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
		capability a transmission provider may set aside for its native load and other committed uses" is assigned to BPS/ESS/ITS (see above BPS/ESS/ITS item that references WEQ 2008 AP Items 2(b)(ii)(2)).			closes on July 21, 2008. Approved by WEQ EC August 19, 2008. Ratified by the membership on 9/22/2008.
		GROUP 7: Tagging for Conditional Firm Service, Submittal Windows			
✔	Order 890-A, paragraph 592	**Tagging for CFS:** Within 180 days of Order 890-A publication, develop tracking capabilities and business practices for tagging for implementation of conditional firm service. **Order 890-A:** 592. We agree with petitioners that the NAESB rules regarding tagging do not allow a transmission provider to change the tag of a transmission customer. That is why, in Order No. 890, the Commission directed transmission providers to coordinate with other transmission providers in their regions to develop their own business practices to implement the tagging and tracking of conditional firm service. Upon consideration of petitioners' concerns, we grant rehearing to require transmission providers, in coordination with NERC and NAESB, to develop within 180 days of publication of this order in the Federal Register a consistent set of tracking capabilities and business practices for tagging for implementation of conditional firm service. We agree with petitioners that a consistent set of practices followed by the industry will reduce transmission provider discretion and bring uniformity in implementing conditional firm service. In the interim, the existing business practices of each transmission provider for tracking and tagging conditional firm service shall remain in effect.	WEQ 2008 Annual Plan Item 2(a)(vii)(1)	FORMAL COMMENT: 3rd Quarter 2008 WEQ EC VOTE: 3rd Quarter 2008 RATIFICATION: 3rd Quarter 2008	Assigned to the ESS/ITS. Order 890-A publications date: January 16, 2008. On April 4, 2008, the ESS/ITS voted to send this recommendation out for informal comments due April 11, 2008. Recommendation posted for 30-day formal comment period on June 25th. Approved by WEQ EC on August 8, 2008. Ratified by the membership on 9/25/2008.
N S	Order 890-A, paragraph 805	**Submittal Windows:** Standardized practices for allocating capacity among requests received during a submittal window. **Order 890-A:** 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	WEQ 2008 Annual Plan Provisional Item 7	FORMAL COMMENT: WEQ EC VOTE: RATIFICATION:	No date assigned for completion.

		Order 890 Work Plan			
	Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
		guidance in developing general allocation procedures.			

Standards Review Subcommittee Update

May 12, 2009

Standards Review Subcommittee

- Meeting:
  - February 10, 2009
  - March 10, 2009
  - April 13, 2009
  - May 5, 2009
- Ongoing Activities
  - Monthly Review of NERC Activities
  - Review of Recommendations posted for Formal Comments
    - Recommendation for WEQ 2009 Annual Plan Item 3.d Develop business practice standards in support of FERC Order No. 717
    - Recommendation for WEQ 2009 Annual Plan Item 6.a.2 Gas/Electric Communications Consistency Changes
    - Recommendation for WEQ 2009 Annual Plan Item 2.a.ii.3 Modify WEQ-001-9.7 Rollover Rights for Redirect on a Firm Basis

Standards Review Subcommittee

- WEQ 2009 Annual Plan Item Annual Plan Item 6.f - Synchronize Bidding Credit Requirements for FTR, TCC and CRR (R08025)
  - Working with Standards Request Submitter to determine if there is industry support for pursuing standards
  - Initial discussions as to whether the scope of the standards request needs to be adjusted.
- Upcoming Activities
  - June 23, 2009, Meeting in Houston to review and provide comments on the NERC 2010-2012 Reliability Standards Development Plan.

Questions/Feedback

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NORTH AMERICAN ENERGY STANDARDS BOARD

2009 WEQ Annual Plan Approved by the Board of Directors on March 26, 2009

	Item Description	Completion[1]	Assignment[2]
1	**Develop business practices standards as needed to complement reliability standards**		
	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)	Develop business practices to support Coordinate Interchange – R05020 "Include a guideline for rounding schedules with partial MWh's in the coordinate interchange business practice WEQ BPS-002-000" the rounding standard recommendation Status: Underway	3rd Q, 2009	JISWG
b)	Continuous support of TLR Procedure in alignment with NERC efforts on TLR Phase II and Phase III development.		
i)	Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection. Note: Activity is dependent on NERC approval of SAR expected in 2nd Q, 2009. Upon approval of the SAR and NAESB action on this item, consideration should be given to provisional item 4. Status: Not Started	4th Q, 2009	BPS
ii)	Update WEQ-008 Appendix D to include the Market Flow Threshold Percentage recommended by NERC working group/task force Status: Not Started (dependent on successful field test - expected Oct. 2009) Upon receipt of recommendation, completion date may be adjusted.	4th Q, 2009	BPS
c)	Conduct analysis as to whether standards can be developed which outline a standardized process for the coordination and execution of emergency energy schedules. These would be complementary standards to EOP-002-2 Requirements R4 and R6 (SRS Analysis of EOP-002-2 R4 & R6) Status: Completed and as a result item (3)(a)(viii) has been added to the plan	1st Q, 2009	JISWG
d)	Time Error and Inadvertent (BAL-004 and BAL-006) Coordination with NERC Status: Not Started (Upon initiation of this item by NAESB. a completion date will be determined. The date of 2011 is based on a completion date provided in the NERC BAC project schedule which includes extensive field testing and diverse proposed TIMTF directions to be reconciled in subcommittee meetings.)	2011	TIMTF
e)	DCS and AGC (BAL-002 and BAL-005) Coordination with NERC Status Not Started (Upon initiation of this item by NAESB. a completion date will be determined. The date of 2011 is based on a completion date provided in the NERC BAC project schedule which includes extensive field testing and diverse proposed TIMTF directions to be reconciled in subcommittee meetings.)	2011	TIMTF

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NORTH AMERICAN ENERGY STANDARDS BOARD

2009 WEQ Annual Plan Approved by the Board of Directors on March 26, 2009

	Item Description	Completion[1]	Assignment[2]
2	**Develop business practice standards in support of the FERC RM05-25-000 and RM05-17-000 (OATT Reform)**		
a)	Develop version 2 business practice standards to better coordinate the use of the transmission system among neighboring transmission providers. Such business practice standards would be based on recommendations from NERC's Long Term ATC/AFC Task Force and would involve revised procedures for the ATC calculation and/or revised protocols as determined by the final order.		
	Status: Underway		
	Development is using joint standards development process with NERC. Request R050004 was expanded to include the Order No. 890 (Docket Nos. RM05-25-000 and RM05-17-000) and Order No. 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002), "Preventing Undue Discrimination and Preference in Transmission Services", issued April 11, 2007).		
i)	Group 3: Network Service On OASIS		
1.	Use of OASIS to Make Electronic Requests to Designate and Terminate Network Resource	3rd Q, 2009	ESS/ITS
	Status: Underway		
2.	Ability to Query Requests to Designate and Terminate Network Resources and Allow for Queries of All Information Provided with Designation Requests	3rd Q, 2009	ESS/ITS
	Status: Underway		
3.	Masking of Designated Network Resource Operating Restrictions and Generating Cost Information	3rd Q, 2009	ESS/ITS
	Status: Underway		
4.	Procedural Requirements for Submitting Designations over new OASIS Functionality	3rd Q, 2009	ESS/ITS
	Status: Underway		
5.	Specify How Designated Network Service Informational Postings are Posted on OASIS	3rd Q, 2009	ESS/ITS
	Status: Underway		
6.	Develop standards for the treatment of OASIS Requests when the Customer Fails to Provide the Necessary Attestation	3rd Q, 2009	ESS/ITS
	Status: Underway		
7.	Procedural Requirements for Submitting Both Temporary and Indefinite Terminations of Network Resources	3rd Q, 2009	ESS/ITS
	Status: Underway		
8.	Procedures for Submitting and Processing Requests for Concomitant Evaluations of Transmission Requests and Temporary Terminations	3rd Q, 2009	ESS/ITS
	Status: Underway		

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	Item Description	Completion[1]	Assignment[2]
ii)	Group 4: Pre-Emption; Request No. R05019; and Revisions to Standard 9.7		
	1. Pre-Emption	4th Q, 2009	ESS/ITS
	Status: Not Started		
	2. Request No. R05019	4th Q, 2009	ESS/ITS
	Status: Not Started		
	3. Modify WEQ-001-9.7 Rollover Rights for Redirect on a Firm Basis	2nd Q, 2009	ESS/ITS
	Status: Underway		
iii)	Group 5: Paragraph 1377		
	1. Paragraph 1377	4th Q, 2009	ESS/ITS
	Status: Not Started		
	2. Re-Bid Of Partial Service across Multiple Transmission Providers' Systems	4th Q, 2009	ESS/ITS
	Status: Not Started		
iv)	Group 6: Miscellaneous (Paragraphs 1390 and 1627 of Order 890)		
	1. Paragraph 1390 of Order 890	4th Q, 2009	ESS/ITS
	Status: Not Started		
	2. Paragraphs 1627 of Order 890	4th Q, 2009	ESS/ITS
	Status: Not Started		
	3. Redispatch Cost Posting to allow for posting of third party offers of planning redispatch services.	4th Q, 2009	ESS/ITS
	Status: Not Started		
b)	Develop the needed business practices as companion to the NERC standards for ATC related efforts		
i)	Develop standards to support existing Request No. R05004.		
	1. The processing of transmission service requests, which use TTC/ATC/AFC, in coordination with NERC changes to MOD 001 where the allocation of flowgate capability based on historical Network Native Load impacts the evaluation of transmission service requests, requiring the posting of those allocation values in conjunction with queries of service offerings on OASIS	3rd Q, 2009	ESS/ITS
	Status: Underway		

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	Item Description	Completion[1]	Assignment[2]
3	**Develop business practices standards to improve the current operation of the wholesale electric market and develop and maintain business practice and communication standards for OASIS and Electronic Scheduling**		
a)	Develop and/or maintain business practice standards as needed for OASIS and electronic scheduling. Specific items to address include:		
i)	Network Services: Determine and develop needed business practice standards or other support is needed to support use of OASIS for Network Service transactions (R04006E). (Related to AP 2(a)(iii)) Status: Underway	3rd Q, 2009	ESS/ITS
ii)	Registry (TSIN): Determine and develop needed business practice standards to support the registry functions currently supported by NERC (R04037, R06027).		
1)	Work with the NAESB counsel to develop a confidentiality agreement, (R07013) Status: Underway	3rd Q, 2009	JISWG
2)	Transition the TSIN Registry from NERC to NAESB as the enhanced Electric Industry Registry (EIR), (R06027). Status: Underway	4th Q, 2009	NAESB/NERC Administration, JISWG
iii)	Document procedures used to implement the displacement/interruption terms of the Pro Forma tariff (R05019). Status: Not Started	4th Q, 2009	ESS/ITS
iv)	Make remaining incremental enhancements to OASIS as an outgrowth of the NAESB March 29, 2005 conference on the future of OASIS (R05026). Scoping statement completed by SRS and assignments made to BPS and ESS/ITS.		
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	4th Q, 2009	ESS/ITS
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. Status: Underway (upon further development of this item by NAESB, a completion date will be determined)	2010	ESS/ITS
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)	2010	ESS/ITS

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		Item Description	Completion[1]	Assignment[2]
	v)	Develop, coordinate inoperability testing, and implement e-Tag version 1.8.1 Status: Underway	4th Q, 2009	JISWG
	vi)	Transition e-Tag Specification and schema to NAESB Status: Complete Version 1.8.1 will be identified as the NAESB Electronic Tagging Functional Specification	1st Q, 2009	JISWG
	vii)	Review and correct the WEQ-004 Coordinate interchange Business Practice Standard as noted during the development of the e-Tag 1.8 development process. Status: Underway	3rd Q, 2009	JISWG
	viii)	Review and correct WEQ-004 Coordinate Interchange Business Practice Standard as needed based on activities in NERC Project 2008-12, Coordinate Interchange Standards Revisions and supporting EOP-002-2 R4 and R6. [note: this is a new item] Status: Not started – dependent on NERC activity (upon initiation of this item by NAESB, a completion date will be determined)	2010	JISWG
b)		Develop and/or maintain standard communication protocols and cyber-security business practices as needed.		
	i)	Develop PKI certification program for e-Tag and OASIS Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	2009	Board Cert. Prgm Comm
	ii)	Develop PKI standards for OASIS. Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	2009	ESS/ITS
	iii)	Develop Industry Implementation Plan for meeting PKI Standard requirements for e-tagging. Status: Underway eTagging items are linked to the transition of the Registry from NERC to NAESB.	July, 2009	JISWG
c)		Develop needed business practice standards for organization/company codes for NAESB standards – and address current issues on the use of DUNs numbers. Status: Underway (upon further development of this item by NAESB, a completion date will be determined) Common code usage is linked to the transition of the Registry from NERC to NAESB	2009	NAESB Staff with WEQ support
d)		Develop business practice standards in support of FERC Order No. 717 Status: Complete	1st Q, 2009	BPS

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	Item Description	Completion[1]	Assignment[2]
4	**Review and develop business practices standards to Demand Response, Demand Side Management and Energy Efficiency Programs** Review and develop needed model business practices for a standardized method for quantifying benefits, savings, cost avoidance and/or the reduction in energy demand and usage derived from the implementation of demand side management and energy efficiency programs. This effort will include demand side response, energy efficiency programs and metering, including the 'curtailment service provider' program.		
a)	Develop matrix and business practice standards for measurement and verification for demand response products and services in ISO/RTO footprint areas. Status: Completed	4th Q, 2008	WEQ Section of the Joint WEQ/REQ DSM Subcommittee
b)	Develop more detailed technical standards for the measurement and verification of demand response products and services in ISO-RTO footprint areas, including examples to be developed to support item 4(a) above. Status: Not Started (Scope to be initiated in 2nd Q, 2009, after which a completion date will be set)	Phase 2	WEQ Section of the Joint WEQ/REQ DSM Subcommittee
c)	Develop preamble for business practice standards for measurement and verification for demand response and energy efficiency programs. Status: Underway	3rd Q, 2009	Joint WEQ/REQ DSM-EE Subcommittee
d)	Develop glossary for business practice standards Status: Underway	3rd Q, 2009	Joint WEQ/REQ DSM-EE Subcommittee
e)	Support retail development of matrix and model business practice standards for measurement and verification for demand response programs Status: Underway	2nd Q, 2009	Retail Section of Joint WEQ/REQ DSM-EE Subcommittee
f)	Develop business practice standards to measure and verify energy reductions that are made to comply with a Renewable Portfolio Standard that included energy efficiency or a stand-alone Energy Efficiency Portfolio Standard. Status: Not Started (Scope to be initiated in 2nd Q, 2009, after which a completion date will be set)	Phase 2	WEQ Section/Joint WEQ/REQ DSM-EE Subcommittee

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	Item Description	Completion[1]	Assignment[2]
g)	Develop business practice standards to factor Demand Control and Energy Efficiency programs into reliability / supply decisions at the wholesale level for generation and transmission planning and operations in ISO/RTO footprint areas. Status: Not Started (Scope to be initiated in 2nd Q, 2009, after which a completion date will be set)	Phase 2	WEQ Section/Joint WEQ/REQ DSM-EE Subcommittee
h)	Develop business practice standards for cap and trade programs for green house gas Status: Not Started (Scope to be initiated in 2nd Q, 2009 at the earliest. Upon conclusion of the scoping statement it will be determined whether NAESB standards development is appropriate)	Phase 2	Joint WEQ/REQ DSM-EE Subcommittee
6	**Maintain existing body of Version 2 standards**		
a)	Make consistency changes to Version 1.0 standards as directed by the WEQ Leadership Committee on December 12, 2007 (R08001 – BPS, ESS/ITS, R08002 - ESS/ITS, R08003 - ESS/ITS - BPS, R08004, R08005 - ESS/ITS)		
1)	OASIS Consistency Changes (R08001, R08002, R08003, R08005) Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	2009	ESS/ITS
2)	Gas / Electric Communication Consistency Changes (R08004) Status: Underway	2nd Q, 2009	BPS
b)	Modify NAESB definitions to address internal inconsistencies and inconsistencies with the NERC glossary. Revise existing NAESB glossary/definition of terms to be applicable to entire set of WEQ Business Practices. (http://www.naesb.org/pdf3/weq_ec051308w3.doc) Status: Underway Subcommittee co-chairs are developing WEQ-000 Definition of Terms/Acronyms to replace definitions being included in each NAESB Business Practice.	2nd Q, 2009	BPS/ESS/ITS/SRS Co-chairs
c)	Develop standards to allow for registered Market Operators to request changes to the Market Level profile of Implemented Interchange (R06006) Status: Complete	1st Q, 2009	JISWG
d)	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. (R08011) Status: Not Started This Standards Request was assigned to the ESS/ITS in May 2008.	3rd Q, 2009	ESS/ITS
e)	Provide for Enhanced Granularity for Public Utilities in Identifying Critical Operational Flow Orders. (R08020) Status: Not Started. This Standards Request was assigned to the BPS in August 2008 (upon initiation of this item by NAESB, a completion date will be determined)	2009	BPS jointly with WGQ BPS

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NORTH AMERICAN ENERGY STANDARDS BOARD
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	Item Description	Completion[1]	Assignment[2]
f)	Synchronize Bidding Credit Requirements for FTR, TCC and CRR (R08025) Posting of collateral is an important issue for financial marketers. Most financial marketers and smaller entities are required to post cash for FTR transactions, while most utilities post unsecured credit. Therefore, the timing for posting collateral is especially crucial to financial marketers. There are two posting periods for FTRs: 1. The Bidding Requirement: Credit must be posted with FTR bids and these monies are held until bids are cleared. 2. The Holding Requirement: After bids are cleared and FTRs awarded, collateral is required for the amount of time the FTR is active. Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	2009	SRS (Scoping)

NORTH AMERICAN ENERGY STANDARDS BOARD
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PROVISIONAL ITEMS

1	Develop and or modify business practices related to support of NERC effort on the NERC Resources and Transmission Adequacy (Project 2009-05 Resource Adequacy Assessment).
2	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).
3	Determine any needed NAESB action in support of the Interchange Distribution Calculator (IDC) and develop any necessary standards.
4	Prepare recommendations for future path for TLR (equity concerns) in concert with NERC, which may include alternative congestion management procedures[3]. Work on this activity is dependent on completing 2009 WEQ Annual Plan 1.c.i (Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection).
5	Develop complementary standards that align with NERC Project 2008-01 Voltage and Reactive Control, for which a white paper is expected after the 2009 SAR is processed.
6	Develop NAESB business practices as needed to complement NERC reliability standards for FAC-012 and FAC-013.
7	Determine NAESB action needed to support FERC Action Plan for Smart Grid Technology.

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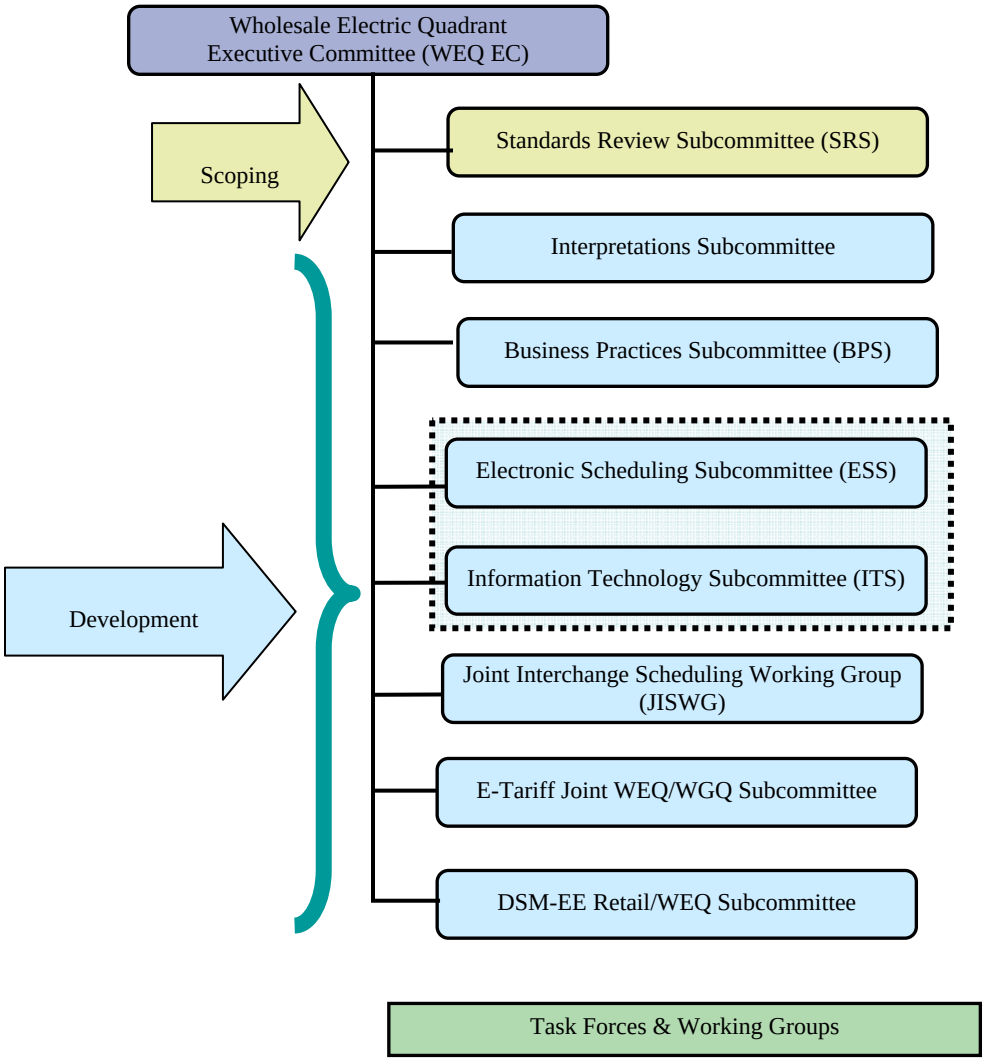

NAESB WEQ EC and Subcommittee Leadership:
Executive Committee: Kathy York (WEQ EC Chair) and Matthew Goldberg (WEQ EC Vice Chair)
Standards Review Subcommittee: Narinder Saini, Ed Skiba
Interpretations Subcommittee: Robert Schwermann
Business Practices Subcommittee & Task Forces: Jim Busbin (TLR), Ed Skiba
Electronic Scheduling Subcommittee/Information Technology Subcommittee & Task Forces: Paul Sorenson, J.T. Wood, Marcie Otondo
Joint Interchange Scheduling Working Group (JISWG): Bob Harshbarger (NAESB), Jim Hansen (NERC)
e-Tariff Joint WEQ/WGQ Subcommittee (e-Tariff): Jane Daly (WEQ), Keith Sappenfield (WGQ)
DSM-EE Joint Retail/WEQ Subcommittee: Ruth Kiselewich and David Koogler (Retail), Roy True and Paul Wattles (WEQ)

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End Notes WEQ 2009 Annual Plan:

[1] Dates in the completion column are by end of the quarter for completion by the assigned committee. 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.

[2] The assignments are abbreviated. The abbreviations and committee structure can be found at the end of the annual plan document.

[3] For additional information, please see comments submitted by PJM and MISO for this Annual Plan Item: http://www.naesb.org/pdf3/weq_aplan102907w1.pdf.

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March 26, 2009

TO: NAESB Board of Directors, Executive Committee (EC) Members, EC Alternates, and Invited Guests

FROM: Cory Galik Cummings, Staff Attorney

RE: Draft Minutes of the NAESB Board Meeting – March 26, 2009

NAESB BOARD OF DIRECTORS MEETING
Marriott IAH Airport Hotel, Houston, Texas
Thursday, March 26 – 9:00 a.m. to 1:00 pm Central
DRAFT MINUTES

1. Administration and Welcome

Mr. Desselle welcomed the Board members and guests in the room and on the phone. Mr. Boswell read the antitrust guidelines. Ms. Cummings called the roll and quorum was established.

The Board members reviewed the draft agenda. Mr. Ellsworth moved to adopt the agenda and the motion was seconded by Mr. Fusco. The agenda was adopted as written. The Board members reviewed the draft minutes from the December 18, 2008 meeting. Mr. Gent moved to adopt the draft minutes and the motion was seconded by Mr. Templeton. The motion passed without objection.

2. Membership and Financial Report

Membership Report: Ms. McQuade reviewed the membership report. The membership profile reflects a 10 member loss since December, 2008. The majority of the resignations were due to companies with multiple memberships reducing their number of memberships. None of the resignations were due to the increase in dues. Ms. McQuade asked members to review the contact list for accuracy.

Financial Report for 2008 Year End: Ms. Wishart provided an account of the financial report and financial chart. While NAESB had planned for a profit of $390,000 there was a loss of $118,000 due to loss of members and increased expenses. Ms. Wishart was confident that the NAESB office will meet its estimated budget at the end of 2009 due to the increase of membership fees. Mr. Gent noted that the amount of negative retained earnings is decreasing. Ms. McQuade noted that NAESB maintained the projected financials reported in June, 2008 as they remained consistent in September and December, 2008. She anticipated a decrease in the negative retained earnings at the end of 2009 and a positive retained earning by the end of 2010.

3. Update from the 2-14-09 Advisory Council Meeting

Review of Advisory Council Meeting: Mr. Ellsworth provided an update on the Advisory Council meeting. At this year's meeting, Ms. McQuade presented a primer of NAESB history, activities and goals. He encouraged members to review this slideshow. A highlight of the meeting was a discussion on NAESB's roles and opportunities in regards to the new stimulus package.

Review of Communications with the U.S. Department of Energy: Mr. Desselle and Ms. McQuade worked with a small group of Board and Advisory Council members to discuss the options available to NAESB regarding the stimulus bill. A position paper was developed to send to the Department of Energy and letters were sent to the Department of Energy and the Federal Energy Regulatory Commission. Ms. McQuade noted that NAESB would be required to review the Wholesale Electric Quadrant (WEQ) body of standards to ensure consistency with any smart grid technology endorsed by the government. A question arose regarding the requirements NAESB would have to fulfill related to accepting grants. Any decision to accept grants should they be offered would be put to the full Board for review and decision. NAESB has accepted services from the DoE through the Sandia National Labs surety assessments of the technical standards and through the DoE development of white papers. Mr. Brown stated that the stimulus package offered a unique opportunity for the industry to obtain experts in the gas and electric markets to deliver products quickly to the market.

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4. Reports from Board Committees

Board Resources: Mr. Brown presented the Board Resources report. He noted a significant discrepancy between the number of new membership and the increase in resignations as companies find ways to cut costs. The loss of membership is not due to the increase in membership dues but rather companies reducing expenses. He also noted several new areas for potential membership including wind producers, solar producers and geothermal producers. He asked for Board volunteers to reach out to Smart Grid companies as that will be particularly important given FERC's policy statement on the Smart Grid and there appears to be a number of opportunities for NAESB standards development. Other areas for new membership opportunities include the recent NOPR from the FERC on Order No. 890 accepting a number of WEQ standards. Once the FERC approves those standards a press release will be released to inform the industry of NAESB's work. FERC's Smart Grid policy statement may also be used to attract new members. NAESB will also contact the participants from the DSM-EE work in an attempt to convert those active in the subcommittee into members.

Retail Restructuring Considerations: Mr. Minneman presented the Retail Restructuring report. The Retail Structure Review Committee (RSR) has met several times since the December Board meeting to address the questions that were raised at that Board meeting. The retail quadrants were formed to address retail and gas in competitive markets. The quadrants have completed the majority of the work envisioned.. The competitive markets did not develop as anticipated when the quadrants were formed. In looking at the direction the quadrants are currently taking, it was agreed that the current structure was not optimal to encourage membership. The RSR proposed the following changes; 1) revise the segment structure to better accommodate new areas of interest, such as energy efficiency and aggregation programs that are of interest to large retailers; 2) reduce the number of segments in each quadrant to three: Supplier/Service Providers, Utilities and End Users/Public Agencies Segment and; 3) reduce the required minimum number of members from forty to twenty. The first two changes can be made by the Retail Quadrants; the third change requires Board approval. The third quadrant (Utilities and End Users) was created in such a way as to encourage involvement of state public agencies as the role of those agencies and the retail industry is different than at the wholesale level. Ms. McQuade noted that the NAESB office has reached out to state commissions to join with NARUC support. Several states are considering it and supportive of state involvement. Mr. Ellsworth stated that with a topic of national interest, such as DSM-EE, there is an increase in interest in ensuring that the work is done correctly. He suggested that now may not be the best time to change the membership requirements but rather wait and see how this national influence impacts the quadrants. Mr. Boswell noted that the Board could extend the status quo of under-populated quadrants. This would require a Board resolution. Ms. McQuade said that if the Board agrees to a resolution to extend the retail quadrants without the minimum member requirement she would recommend that the RSR not disband but report back to the Board every quarter on their progress. Mr. Kruse expressed concern with a resolution that waived the membership requirement for two years. He noted that over the next six months to a year there should be enough interest in retail to increase membership. Mr. Kruse moved to allow a waiver of the minimum membership requirements for the Retail Quadrants for twelve months with quarterly reports from the SRS. Mr. Ellsworth seconded the motion. The motion unanimously passed a simple majority vote.

Managing Committee: Mr. Desselle provided the report of the Managing Committee. They met on January 23 to review NAESB salaries. At that meeting the committee also discussed NERC coordination. They met again this morning to review today's agenda. The Managing Committee discussed an item that was raised during yesterday's WEQ leadership meeting with respect to segment blocks. NAESB's current practice is to notify the FERC with respect to segment blocks. With the change made to the bylaws to prevent segment blocks by un-fully populated segments, NAESB will continue to notify FERC of those segment's actions as well so that if the segment would have blocked but for the lack of seated EC members, the FERC will still be notified of that segment's activities.

5. Updates on Specific Efforts

Wholesale Electric Quadrant: Ms. York provided the update for the WEQ. The NAESB office filed the WEQ Version 2.1 standards with the FERC on February 19, 2009. The filing covered standards that were developed or modified between last August and February of this year and included standards to support FERC Order Nos. 890, 890-A and 890-B, including standards for Capacity Benefit Margin and part one of a two-part modification to the

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NAESB standards regarding the grant of transmission rollover rights to requests for redirect on a firm basis. Part two of this standard is currently under development. The filing also included modifications to the Commercial Timing Table for Appendix D of the Coordinate Interchange standard, modifications to the TLR standards and appendices to provide more clarity and alignment with the NERC reliability standard. The filing also includes three minor corrections for the WEQ standards. The report on standards development covered only one failed standard related to Order 890 that addressed a request to formulate an ATC information list. This standard did not garner super-majority support of the WEQ Executive Committee. The remainder of the standards to address FERC Order No. 890 will be filed separately once the language for those standards is complete and will be submitted as WEQ Standards Version 2.2. That filing is expected in the first quarter of 2010.

The standards left to be addressed are related to Group 3 on Network Service on OASIS, Group 4 related to Pre-Emption and Rollover Rights, Group 5 related to Rebid of Partial Service, and Group 6 related to re-dispatch cost posting and other miscellaneous items. The subcommittee is working to get all of this work completed by end of year to support a first quarter 2010 filing.

Last week, FERC issued a NOPR on the NAESB 2.1 standards. They also released a NOPR on the NERC standards. These standards were all completed through the joint NERC/NAESB process. NERC had made a filing related to our Version 2.1 standards indicating that there may be one potential issue with the CBM standard. FERC indicated in the NOPR that they did not see an issue.

The subcommittee is also working on a variety of OASIS-related standards, in particular the transfer of the E-Tagging Specifications and the Transmission Service Information Network (TSIN) from NERC to NAESB. For E-Tagging, the subcommittee is working with NERC to coordinate the transfer and perform testing. The next version of E-Tagging will be identified as NAESB's document and titled the NAESB Electronic Tagging Functional Specification. Work is underway to determine and develop the appropriate business practice standards to support the transfer of TSIN. There is a draft confidentiality agreement currently posted for informal comment. The transition of the TSIN Registry will be known as the NAESB Electric Industry Registry (EIR). Currently, NERC and NAESB are working on a Request for Proposal (RFP) for a third party to manage and host the registry.

The Business Practice Subcommittee is continuing to work on a number of items, including changes to the standards related to Standards of Conduct, working in coordination with the NERC team on TLR issues as well as time error correction and inadvertent interchange payback, modifications to the gas/electric communication standards, among other items.

The Standards Review Subcommittee is continuing to work to review the release of NERC SARS to help NAESB stay coordinated with needed business practice standards to complement any reliability standards.

The WEQ is continuing to work diligently along with the Retail Quadrant on Demand-Side Management and Energy Efficiency Standards. This effort will continue to grow in importance as there is an increase in legislation and regulation focus in this area.

Wholesale Gas Quadrant: Mr. Buccigross provided the update for the WGQ. The FERC Order Nos. 698 and 717 implementation documents have been completed in the subcommittee and will be voted out at the May WGQ EC meeting. The fully staffed recommendations will go out for formal comment before the EC votes on them at the May EC meeting. They will be included in the Version 1.9 publication to be published in the 3rd quarter of 2009. In reference to Version 1.8, the pipelines are currently preparing for the tariff changes. The deadline for the tariff filings is July 1 with an actual implementation date of August 1, 2009.

WEQ and Retail DSM-EE efforts: Mr. True provided the update for the DSM-EE efforts. On February 10 the WEQ EC approved the Demand Response (DR) standards and on March 16 WEQ membership ratified the standards unanimously. The NAESB office will file these standards with the FERC shortly. Phase two of the standards development process for DR will add specificity and granularity to the approved standards. Mr. True suggested the creation of a separate subcommittee, not dependent on the completion of the efforts developing DR measurement and verification standards, to begin work on the Energy Efficiency standards, of which the Board was supportive.

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Mr. Desselle noted that with the filing of these standards with FERC, a press release will be sent out to inform the industry of NAESB's progress on these efforts.

Mr. Newcomb provided a review of the Retail DSM-EE efforts. The retail work group has been meeting every other Thursday to complete a draft recommendation for the measurement and verification of DR standards. The work group used the wholesale standards as a template and converted it into a workable retail recommendation. The group has reviewed the draft recommendation with dispatchable programs and once that work is complete they will review it with non-dispatchable programs. The goal is to determine the areas where greater granularity can be added. Definitions are being identified and more specific efforts to review the glossary terms will be made with the Retail Glossary subcommittee.

Mr. Kirby asked if the wholesale and retail work was being coordinated to ensure consistency. Mr. Newcomb said that the work groups are coordinated and share several members. The retail recommendation will state that if there is a retail DR product offered in the wholesale market, the WEQ standards will take precedence. Ms. McQuade also noted that in support of coordination, the retail recommendation will be voted on by the entire DSM-EE subcommittee which includes both wholesale and retail participants.

Retail Quadrants: Mr. Precht provided the update for the Retail Quadrants. The Business Practice Subcommittee (BPS) is mostly maintaining the retail standards but there is still one part of the competitive environment work that is still being addressed, customer inquiries. They have developed Model Business Practices for customer inquiries and hope to vote them out of the subcommittee in April. They are also working on the creation of flow diagrams for billing and payments in a competitive environment. The glossary subcommittee has been working in conjunction with the BPS.

6. Executive Committee Reports

The 2009 WGQ Annual Plan was reviewed. The following items changed; the status of item 3(a)(i) was changed to complete; 3(b) was changed to underway; and 4(a) and 4(b) were both changed to complete. The 2009 Retail Annual Plan was reviewed. Mr. Precht noted a supplemental work paper that was submitted in relation to AP item 6. There is concern on the part of gas distribution companies that the retail gas industry is not ready to address demand response and demand side management standards as they are not as fully developed as the electric industry. Mr. Desselle said it was noted that the DR standards would apply to the REQ only. The 2009 WEQ Annual Plan was reviewed. The following items changed; the expected completion date of 2(a)(ii)(3) changed to 2nd Quarter, 2009; the status of item 3(d) was changed to complete; Item 4(a) noted that examples were to be provided. 4(a) was left as a reference point and the notation for examples was moved to item 4(b). Under provisional items, the Board added development of NAESB business practices as needed to complement NERC reliability standards for FAC-012 and FAC-013. It was also noted that for Annual Plan item 4, a separate subcommittee would be created to address the EE standards.

Mr. Smead moved to adopt the changes to the Annual Plans and Mr. Kirby seconded the motion. The motion passed unanimously.

7. Plan for June 2009 Board Meeting

The next NAESB Board of Directors meeting will be held on Thursday, June 25, 2009 at the Marriott Houston Intercontinental Hotel from 9:00 am to 1:00 pm Central.

8. Old and New Business

Ms. McQuade noted that NAESB would be hosting a workshop on consensus building in Las Vegas, Nevada at the MGM Grand Hotel. Mr. Miles, from the FERC, would be presenting. Mr. Boswell and Mr. Buccigross would conduct a presentation on roles and responsibilities of NAESB EC and Board members.

An e-Tariff vendor fair will be held on Tuesday, April 28 from 1:00 pm to 5:00 pm Eastern at the Renaissance Hotel in Washington, DC. The vendor fair was being held in coordination with a FERC technology conference.

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9. Adjourn

Ms. Burnett moved to adjourn the meeting. The meeting adjourned at 11:30 pm Central.

10. Board Attendance and Voting Record (Vacancies Omitted)

		ATTENDANCE
WGQ PRODUCERS SEGMENT		
Richard D. Smith	Regulatory & Compliance Manager, Noble Energy Inc.	In Person
Bill Hebenstreit	Marketing Manager, Goodrich Petroleum Company LLC	In Person
Keith Sappenfield	Regional Director – US Regulatory Affairs, EnCana Oil & Gas (USA) Inc.	Phone
Marty Patterson	Vice President – Commercial Operations, Foothills Energy Ventures LLC	In Person
Pete Frost	Director - Regulatory Affairs, ConocoPhillips Gas and Power Marketing	Phone
WGQ PIPELINE SEGMENT		
Cathie Legge	Manager – Customer Service, Alliance Pipeline LP	In Person
Bill Grygar	Vice President, Panhandle Eastern Pipe Line	In Person
Susanna B. Barry	Vice President – Commercial Operations, Tennessee Gas Pipeline Company	
Anne Bomar	Vice President, Dominion	
Richard Kruse	Senior Vice President, Spectra Energy Transmission	In Person
WGQ LOCAL DISTRIBUTION COMPANY (LDC) SEGMENT		
Adrian Chapman	Vice President, Regulatory Affairs & Energy Acquisition, Washington Gas	
Carlos Thillet	Manager, Gas Supply & Transportation, PECO Energy Co.	In Person
Mike Novak	Asst. General Manager, National Fuel Gas Distribution Corporation	
Lee Stewart	Senior Vice President, Gas Transmission, Southern California Gas Company	Phone
WGQ END USERS SEGMENT		
Valerie Crockett	Senior Energy & Policy Specialist, Tennessee Valley Authority	In Person
Timothy W. Gerrish	Director of Origination-Energy Marketing and Trading, Florida Power & Light	
Tina Burnett	Natural Gas Resources Administrator, The Boeing Co.	In Person
Lori-Lynn C. Pennock	Senior Fuel Supply Analyst, Salt River Project	In Person
Jim Templeton	Principal, Comprehensive Energy Services	In Person
WGQ SERVICES SEGMENT		
Steve Abbey	Manager of Regulatory Affairs, Marketing Department, Anadarko	
Rusty Braziel	Managing Director, Bentek Energy, LLC	In Person
Jim Buccigross	Vice President Energy Industry Practice, 8760 Inc.	Phone
Lori Leeder	Relationship Manager/Business Development – Asset Optimization, Vega Energy Partners	In Person
REQ SUPPLIERS SEGMENT		
Robert K. Koger	President, North Carolina Advanced Energy Corporation	In Person
REQ DISTRIBUTORS SEGMENT		
David Koogler	Director – State Regulation, Dominion Virginia Power	In Person
Dennis Derricks	Director Regulatory Policy and Analysis, Wisconsin Public Service Corporation	Phone
Ruth Kiselewich	Director, Conservation Programs, Baltimore Gas & Electric Company	
Debbie McKeever	Market Advocate, Oncor	
REQ END USERS SEGMENT		
Sonny Popowsky	Consumer Advocate, Pennsylvania Office of Consumer Advocate	
REQ SERVICE PROVIDERS SEGMENT		
Jim Minneman	Controller, PPL Solutions LLC	Phone
David Pickles	Vice President, ICF International	
J Cade Burks	President, EC Power	In Person
WEQ TRANSMISSION SEGMENT	**SUB SEG:**	
Dan Klempel	Director Transmission Regulatory Compliance, Basin Electric Power	Muni/Coop

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			ATTENDANCE
	Cooperative		
Chuck Feagans	Senior Manager, Reliability Policy, Tennessee Valley Authority	Fed/State/Prov.	Phone
John E. Lucas	Director - Transmission Policy and Services, Southern Company Transmission	IOU	Phone
Jill Horswell	Director Transmission, Southern California Edison	at large	In Person
Edward J. Davis	Policy Consultant, Entergy Services, Inc.	at large	In Person
Michelle Mizumori	Market Interface Manager, Western Electricity Coordinating Council (WECC)	At-Large	In Person
WEQ GENERATION SEGMENT			
Curtis Winterfeld	Vice President of Power Marketing, Deseret Generation & Transmission Cooperative	Muni/Coop	Phone
Belinda Thornton	General Manager - Energy Origination, Tennessee Valley Authority	Fed/State/Prov.	
Lou Oberski	Director – Electric Market Policy, Dominion Resources Services, Inc.	IOU	In Person
Charles W. Severance	Manager – Supply & Wholesale Services, Wisconsin Public Service Corporation	IOU	
Ron Mucci	Consultant, Representing Entegra Power Group LLC	Merchant	Phone
Gloria Godson	Vice President Energy Policy, Conectiv Energy Supply, Inc.	Merchant	
Shah Hossain	Senior Regulatory Specialist, Westar Energy, Inc.	at large	In Person
WEQ MARKETERS/BROKERS SEGMENT			
Roy True	Manager of Regulatory and Markets Development, ACES Power Marketing	Muni/Coop	In Person
Jeff Ackerman	Manager, Colorado River Storage Project Energy Management and Marketing Office, Western Area Power Administration	Fed/State/Prov.	
Jack Cashin	Senior Manager of Policy, Electric Power Supply Association (EPSA)	at large	
Sam Forrest	Vice President, Energy Marketing and Trading, Florida Power & Light	IOU	
R. Scott Brown	Vice President and Director, Exelon Generation Power Team	IOU	In Person
Rick Smead	Director, Navigant Consulting, Inc.	At-Large	In Person
WEQ DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT			
Arthur G. Fusco	Vice President and General Counsel, Central Electric Power Cooperative Inc.	Muni/Coop	In Person
Paul McCurley	Manager – Power Supply, National Rural Electric Cooperative Association	Muni/Coop	In Person
Frank Johnson	Senior Vice President Electric Transmission and Distribution, Consumers Energy	IOU	
Thomas Burgess	Director – FERC Compliance, FirstEnergy Service Company	at large	Phone
Joe Hartsoe	Managing Director – Federal Policy, American Electric Power Service Corp.	at large	
Bruce Ellsworth	New York State Reliability Council	At-Large	In Person
WEQ END USERS SEGMENT			
Aaron Breidenbaugh	Senior Manager – Regulatory Affairs and Public Policy – New York, EnerNOC, Inc.		
Thomas G. Dvorsky	Director of the Office of Electricity, Gas, and Water at the New York State Department of Public Service	Regulator	
Michehl Gent	Open Access Technology International, Inc.	At-Large	In Person
WEQ INDEPENDENT GRID OPERATORS/PLANNERS			
Michael Desselle	Vice President Process Integrity, Southwest Power Pool		In Person
Kent Saathoff	Vice President of System Operations, ERCOT		In Person
Kevin Kirby	Vice President Market Operations, ISO New England, Inc.		In Person
Rana Mukerji	Vice President Market Structures, New York Independent System Operator, Inc. (NYISO)		
Andy Ott	Senior Vice President Marketing, PJM Interconnection		
Bill Phillips	Vice President Standards Compliance & Strategy, Midwest ISO (MISO)		In Person

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		ATTENDANCE
Don Tench	Director Planning & Assessments, Independent Electricity System Operator (IESO)	Phone
RGQ DISTRIBUTORS SEGMENT		
Alonzo Weaver	Vice President of Engineering and Operations, Memphis Light, Gas & Water Division (APGA)	
Ralph Cleveland	Senior Vice President – Engineering and Operations, AGL Resources, Inc.	In Person
SERVICE PROVIDERS SEGMENT		
Leigh Spangler	President, Latitude Technologies Inc.	In Person
Dave Darnell	President & CEO, Systrends USA	
Greg Lander	President, Capacity Center	

The subsegments noted in the above roster are:

At-Large -- Regional reliability organizations, regional transmission organizations, consultants, service companies, information services and software companies, law firms, and other such organizations that are not specifically encompassed in the other subsegments for a given segment.

Competitive Retailer (not available to MUNI/COOP, IOU or IOU affiliates)

End Use (also in another segment)

Federal/State/Provincial

IOU – Investor Owned Utility or IOU Affiliated

ITC – Independent Transmission Company

Large Industrials (not in other segments)

Merchant

Muni/Coop – Municipals, Cooperatives

Not IOU Affiliated

OTHER -- (not available to MUNI/COOP, IOU or IOU affiliates)

Regulator

Residential/Commercial

End Use (Self Generation)

The numbers of seats within each segment that are allotted to sub-segments are controlled through the WEQ Procedures.

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11. Other Attendance

Name	Organization	Attendance
Steve Abbey	Anadarko Energy Services Company	In person
Jonathan Booe	NAESB	In Person
Bill Boswell	NAESB	In Person
Jim Buccigross	8760 Inc.	Phone
Kathryn Burch	Spectra Energy Transmission	In Person
Christopher Burden	Williams Gas Pipeline	In Person
Ralph Cleveland	AGL Resources	In Person
Cory Cummings	NAESB	In Person
Deonne Cunningham	NAESB	In Person
Dale Davis	Williams Gas Pipeline	In Person
Michelle Foss	Bureau of Economic Geology, University of Texas	In Person
Mark Gracey	Tennessee Gas Pipeline	In Person
Bill Griffith	El Paso Natural Gas	In Person
Ryan Irwin	FERC	Phone
Iris King	Dominion	In Person
Bill Lohrman	FERC	Phone
Marcy McCain	Spectra Energy Transmission	In Person
Rae McQuade	NAESB	In Person
Joel Mickey	ERCOT	In Person
Susan Munson	ERCOT	In Person
Ripley Newcomb	Dominion	Phone
Phil Precht	BGE	Phone
Denise Rager	NAESB	In Person
Ed Skiba	Midwest ISO	In Person
Micki Schmitz	Northern Natural Gas	In Person
Julia Souder	NERC	In Person
Mack Thompson	American Municipal Power	In Person
Veronica Thomason	NAESB	In Person
Kim Van Pelt	Panhandle Eastern Pipeline	In Person
Jill Web	Preferred Legal Services	In Person
Darla Wishart	NAESB	In Person
Charles Yeung	SPP	In Person
Kathy York	Tennessee Valley Authority	In Person
Randy Young	Boardwalk Pipelines	Phone

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NORTH AMERICAN ENERGY STANDARDS BOARD

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Item Description	Completion[i]	Assignment[ii]
1. Damage Reporting for Natural Gas Pipeline Facilities		
Review and develop standards as appropriate to support posting of information as noted in Docket No. RM06-18-000, Order No. 682 and Docket No. RM06-18-001, Order No. 682-A. Review transmission line damage reporting to identify commonality and apply as appropriate. Status: Underway	2nd Q, 2009	Interpretations
2. Contracts Activities		
a. Update ISDA Gas Annex to correspond to the updated NAESB Base Contract for Sale and Purchase of Sale of Natural Gas, dated September 5, 2006. Status: Underway	1st Q, 2009	Contracts
b. Revise the Trading Partner Agreement TPA by removing the Exhibits from the agreement and relegate such information as contained in the Exhibits to operational worksheet(s), (R08015). Status: Underway	2nd Q, 2009	Joint Retail BPS/WGQ Contracts
3. Gas-Electric Interdependency		
Respond to directives of FERC Order No. 698 issued 6-25-07, Docket Nos. RM05-5-001 and RM96-1-027 as related to the NAESB reports submitted in Docket No. RM05-28-000:		
a. ¶ 56 of Order No. 698: "… Under the Commission regulations, the releasing shipper is responsible for clearly setting out the terms and conditions of the release and that would include the means for implementing the formula rate. This is also an issue on which NAESB can develop standards to ensure that such releases can be processed quickly and efficiently." (emphasis added)		
i.) Prepare fully staffed recommendation Status: Complete	2nd Q, 2009	BPS, IR/Technical
b. Provide for Enhanced Granularity for Public Utilities in Identifying Critical Operational Flow Orders. (R08020) Status: Underway	4th Q, 2009	BPS jointly with WEQ BPS
4. Promotion of a More Efficient Capacity Release Market		
Review FERC Order Nos. 712 and 712A and modify NAESB standards as appropriate (Docket Nos. RM08-1-000, RM08-1-001).		
a. Develop business practice standards as appropriate Status: Complete	2nd Q, 2009	BPS/Interpretations
b. Prepare fully staffed recommendation Status: Complete	2nd Q, 2009	BPS, Interpretations, IR and Technical

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Item Description	Completion[i]	Assignment[ii]
5. Capacity Release EDI Review		
Review capacity release transactions upload and related responses to determine suitability for EDI		
a. Conduct Technical Investigation and prepare report for BPS consideration Status: Not Started (Dependent on conclusion of Item 4)	3rd Q, 2009	IR/Technical
b. Develop Business Practice Standards as appropriate Status: Not Started (Adjustments may be made to Completion Dates based on report from Item 5.a)	3rd Q, 2009	BPS
c. Prepare fully staffed recommendation Status: Not Started (Adjustments may be made to Completion Dates based on report from Item 5.a)	1st Q, 2010	BPS, IR/Technical
6. Customer Security Administration		
Review and develop standards as appropriate to support Customer Security Administration Standards (Comment Submittal, 10-29-07) Status: Not started (Scoping to take place 1st Q, 2009 after which a Completion Date will be set)	2009	BPS
7. Gas Quality Reporting		
a. Respond to directives of FERC Docket No. RP07-504-000: ¶ 10 "… develop a uniform set of standards regarding the posting of rapidly changing gas quality information applicable to those pipelines which are required by their tariffs to do so." (Docket No. RP07-504-000) Status: Complete	1st Q, 2009	BPS
b. Prepare fully staffed recommendation Status: Not started	2nd Q, 2009	IR/Technical
8. Standards of Conduct		
Review and develop standards, as appropriate, to support posting of standards of conduct information pursuant to Docket No. RM07-1-000, Order No. 717 Status: Complete	1st Q, 2009	BPS
9. Electronic Delivery Mechanisms		
Review minimum technical characteristics in Appendices B, C, and D of the WGQ QEDM Manual, and make changes as appropriate. Status: Complete	1st Q, 2009	EDM

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Item Description	Completion[i]	Assignment[ii]
Program of Standards Maintenance & Fully Staffed Standards Work		
Business Practice Requests	Ongoing	Assigned by the EC[iii]
Continue review against plan for migration to ANSI ASC X12 new versions as needed and coordinate such activities with DISA.	Ongoing	ANSI X12 Subcommittee
Information Requirements and Technical Mapping of Business Practices	Ongoing	Assigned by the EC[4]
Interpretations for Clarifying Language Ambiguities	Ongoing	Assigned by the EC[4]
Maintenance of Code Values and Other Technical Matters	Ongoing	Assigned by the EC[4]
Provisional Activities		
Respond to requests as received that are related to Docket No. AD06-11-000 (Market Transparency Reporting).		

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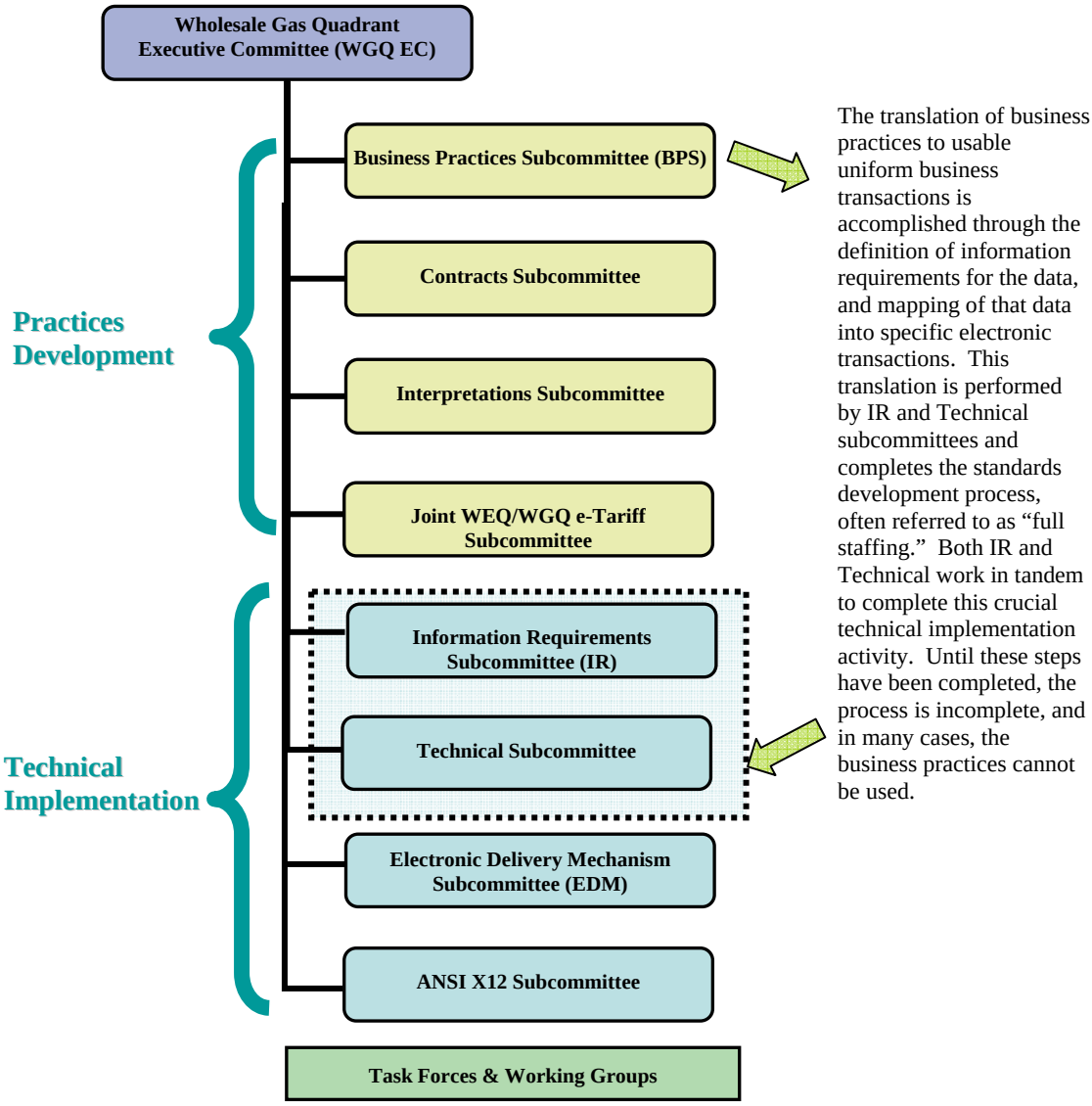

The translation of business practices to usable uniform business transactions is accomplished through the definition of information requirements for the data, and mapping of that data into specific electronic transactions. This translation is performed by IR and Technical subcommittees and completes the standards development process, often referred to as "full staffing." Both IR and Technical work in tandem to complete this crucial technical implementation activity. Until these steps have been completed, the process is incomplete, and in many cases, the business practices cannot be used.

NAESB 2009 WGQ EC and Subcommittee Leadership:

Executive Committee: Jim Buccigross, Chair and Mike Novak, Vice-Chair
Business Practices Subcommittee: Kim Van Pelt, Valerie Crockett, Steve Abbey and Richard Smith
Information Requirements Subcommittee: Dale Davis
Technical Subcommittee: Mike Stender, Kim Van Pelt
Contracts Subcommittee: Keith Sappenfield
Electronic Delivery Mechanism Subcommittee: Leigh Spangler, Christopher Burden
Interpretations Subcommittee: Paul Love
Joint WEQ/WGQ e-Tariff Subcommittee: Keith Sappenfield, Jane Daly

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End Notes WGQ 2009 Annual Plan:

[i] Dates in the completion column are by end of the quarter for completion by the assigned committee. 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 committee structure can be found at the end of the annual plan document.

[iii] The EC assigns maintenance of existing standards on a request-by-request basis.

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Adopted by the NAESB Board of Directors on March 26, 2009

	Item Number & Description[i]	Completion[ii]	Assignment[iii]
1.	Electronic Retail Billing.		
	Develop Technical Electronic Implementation Standards and Data Dictionaries – Book 9: Customer Billing and Payment Notification via Uniform Electronic Transactions, (R05016 and Attachment, submitted by Wal-Mart/J.C. Penney) Status: Underway	2nd Q, 2009	TEIS
2.	Develop Technical Electronic Implementation Standards and Data Dictionaries – Book 8: Customer Information Status: Underway	2nd Q, 2009	TEIS
3.	Develop Technical Electronic Implementation Standards and Data Dictionaries – Book 10: Customer Enrollment, Drop and Account Information Change (Non Texas Model) Status: Underway	2nd Q, 2009	TEIS
4.	Customer Inquiries		
	a. Develop Model Business Practices and procedures for responding to customer inquiries directed to Distributors and/or Suppliers and for notification of the other party. Status: Underway	2nd Q, 2009	BPS
	b. Develop Technical Electronic Implementation Standards to support MBPs for customer inquiries directed to Distributors and/or Suppliers and for notification of the other party. Status: Not Started	3rd Q, 2009	IR/TEIS/Texas Task Force
5.	Develop NAESB Certification checklist criteria for Retail Quadrants to be used in the NAESB Certification Program. Status: Not Started. Dependent upon publication of Version 1.1 at a minimum, but more dependent upon completion of Customer Choice efforts.	4th Q, 2009	Ad Hoc EC Certification Group
6.	Review and develop needed model business practices for a standardized method for quantifying benefits, savings, cost avoidance and/or the reduction in energy demand and usage derived from the implementation of demand side management and energy efficiency programs. This effort will include demand side response, energy efficiency programs and metering, including the 'curtailment service provider' program. Status: Underway		Joint WEQ/REQ DSM Subcommittee
	a. Develop matrix and business practice standards for measurement and verification for demand response products and services in ISO/RTO footprint areas. Status: Completed (examples still to be provided)	4th Q, 2008	WEQ Section of the Joint WEQ/REQ DSM Subcommittee
	b. Develop more detailed technical standards for the measurement and verification of demand response products and services in ISO-RTO footprint areas. Status: Not Started (Scope to be initiated in 2nd Q, 2009, after which a completion date will be set)	Phase 2	WEQ Section of the Joint WEQ/REQ DSM Subcommittee

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	Item Number & Description[i]	Completion[ii]	Assignment[iii]
c.	Develop preamble for business practice standards for measurement and verification for demand response and energy efficiency programs. Status: Underway	3rd Q, 2009	Joint WEQ/REQ DSM Subcommittee
d.	Develop glossary for business practice standards Status: Underway	3rd Q, 2009	Joint WEQ/REQ DSM Subcommittee
e.	Support retail development of matrix and model business practice standards for measurement and verification for demand response programs Status: Underway	2nd Q, 2009	Retail Section of the Joint WEQ/REQ DSM Subcommittee
f.	Develop business practice standards to measure and verify energy reductions that are made to comply with a Renewable Portfolio Standard that included energy efficiency or a stand-alone Energy Efficiency Portfolio Standard. Status: Not Started (Scope to be initiated in 2nd Q, 2009, after which a completion date will be set)	Phase 2*	WEQ Section of the Joint WEQ/REQ DSM Subcommittee
g.	Develop business practice standards to factor Demand Control and Energy Efficiency programs into reliability / supply decisions at the wholesale level for generation and transmission planning and operations. Status: Not Started (Scope to be initiated in 2nd Q, 2009, after which a completion date will be set)	Phase 2*	WEQ Section of the Joint WEQ/REQ DSM Subcommittee
h.	Develop business practice standards to support cap and trade programs for green house gas. Status: Not Started (Scope to be initiated in 2nd Q, 2009 at the earliest. Upon conclusion of the scoping statement it will be determined whether NAESB standards development is appropriate)	Phase 2*	Joint WEQ/REQ DSM Subcommittee
7.	Revise the Trading Partner Agreement TPA by removing the Exhibits from the agreement and relegate such information as contained in the Exhibits to operational worksheet(s), (R08015). Status: Underway	2nd Q, 2009	Joint Retail/WGQ Contracts
8.	Billing and Payments		
a.	Develop Process Flows to be included as models in book 3 – billing and payments Status: Underway	2nd Q, 2009	BPS
b.	If the development of Process Flows indicate a gap in the model business practices, then develop new model business practices to address the gap. Status: Not Started	2nd Q, 2009	BPS

* These items may be moved to Provisional Activities

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	Item Number & Description[i]	Completion[ii]	Assignment[iii]
9.	Model Business Practices User Guide Add a new section to Book 0 to describe what Books have been developed, how the Books are laid out, and revised the title of the Book to reflect the additions Status: Not Started	3rd Q, 2009	BPS
10.	Additional Registration Agent Processes		
	a. Review all existing Model Business Practices to determine if the Service Request process is already covered, and if necessary develop any new Model Business Practices required Status: Not Started	4th Q, 2009	BPS
	b. Review all existing Model Business Practices to determine if the update Customer Information process is already covered, and if necessary develop any new Model Business Practices required Status: Not Started	4th Q, 2009	BPS
	c. Review all existing Model Business Practices to determine if the disconnection and reconnection process is already covered, and if necessary develop any new Model Business Practices required. Status: Not Started	4th Q, 2009	BPS
	d. Review all existing Model Business Practices to determine if the billing & payment process is already covered, and if necessary develop any new Model Business Practices required Status: Not Started	4th Q, 2009	BPS
11.	Supplier Certification Review Book 1 – Market Participant Interactions to determine if Supplier Certification is fully covered, and if necessary develop any new Model Business Practices required with the potential of moving all related Model Business Practices to a new Book Status: Not Started	4th Q, 2009	BPS
12.	Supplier Marketing Practices Develop Model Business Practices providing for a "Consumer Disclosure Statement" to be presented to residential and small commercial customers describing the Supplier's service offering and related contract provisions. This statement would also identify how certain Supplier-Customer interactions are conducted. Amongst the topics to be considered for inclusion on the statement would be the following: • the most important terms of the Supplier agreement, such as the contract's term and termination fee provisions; • training and identification of Supplier marketing representatives; • protocols for Supplier in-person and telephone contacts with customers; • added measures for protecting non-English speaking customers; and • Processes for handling customer complaints and resolving disputes arising from Supplier marketing activities. Status: Not Started	4th Q, 2009	BPS

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NORTH AMERICAN ENERGY STANDARDS BOARD
2009 ANNUAL PLAN for the RETAIL GAS and ELECTRIC QUADRANTS
Adopted by the NAESB Board of Directors on March 26, 2009

Item Number & Description[i]	Completion[ii]	Assignment[iii]
Program of Standards Maintenance & Fully Staffed Standards Work[iv]		
Business Practice Requests	Ongoing	Assigned by the EC
Information Requirements and Technical Mapping of Business Practices	Ongoing	Assigned by the EC
Ongoing Interpretations for Clarifying Language Ambiguities	Ongoing	Assigned by the EC
Ongoing Maintenance of Code Values and Other Technical Matters	Ongoing	Assigned by the EC
Ongoing Development and Maintenance of Definitions	Ongoing	Glossary

Provisional Activities

Joint Effort:

Supplier Certification: Develop practices for Distribution Companies to register/certify new Suppliers when they seek to begin doing business in the Distribution Company's service area.

Modify TPA as necessary.

Review security standards as may be deemed necessary, such as Public Key Infrastructure (PKI).

Review existing body of model business practices for consistency and develop or modify model business practices as needed.

Retail Electric Quadrant Effort Only:

Retail Meter Data Validation, Editing & Estimating: Develop procedures for insuring the integrity and validity of retail customer metering data that is needed by utilities and suppliers for billing, etc. Issues related to unbundled or competitive metering are not to be considered.

Settlement Process: Reconcile energy schedules and energy delivered by suppliers within a given market. Note: will need to be coordinated with the WEQ for the REQ.

Retail Gas Quadrant Effort Only:

Examine Wholesale Gas Quadrant Non-EDM Standards for applicability to retail business practices.

Settlement Process: Reconcile energy schedules and energy delivered by suppliers within a given market.

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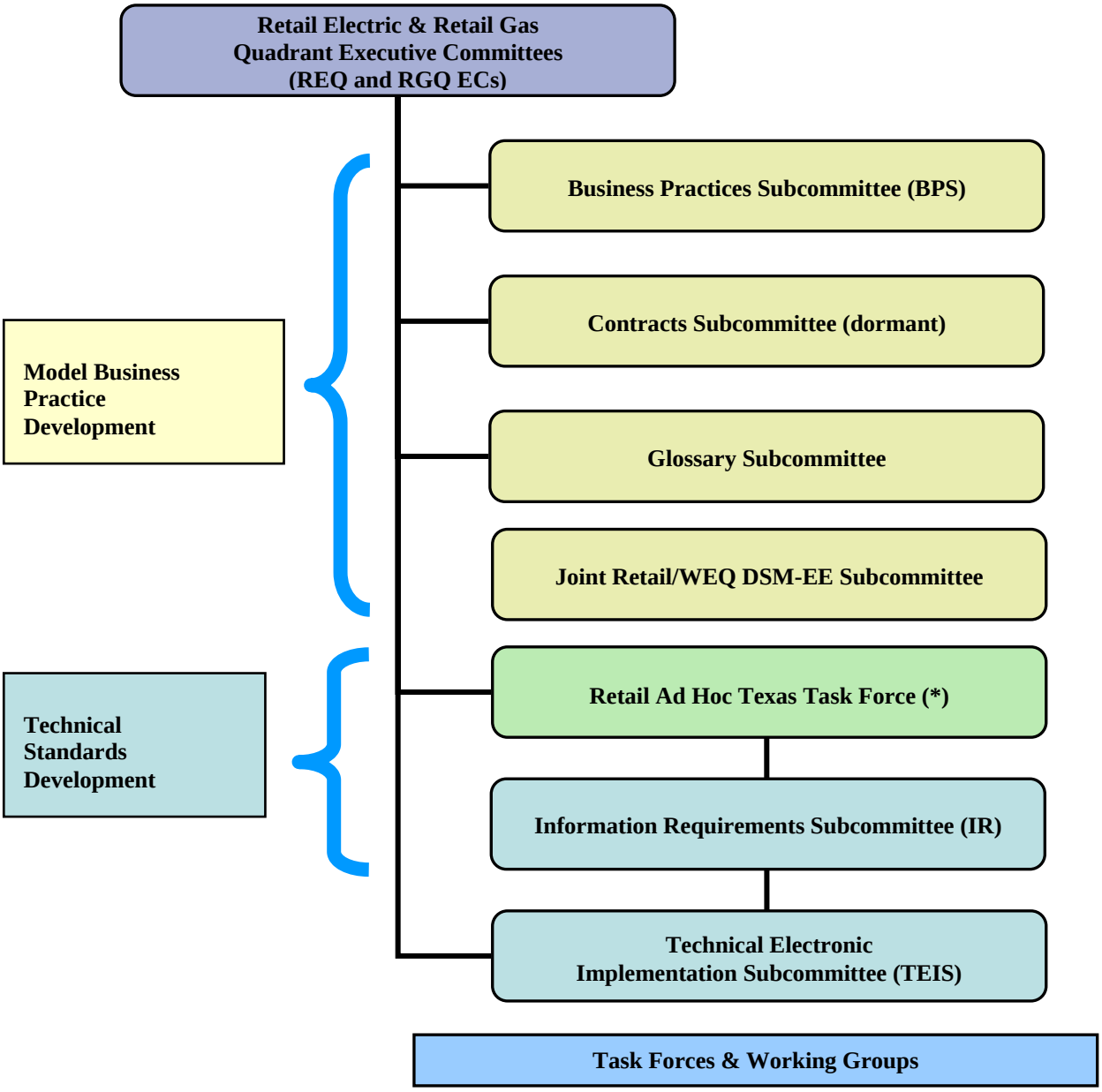

NAESB Retail Subcommittee Leadership: [v]

Executive Committee: Mike Novak, Chair (RGQ), Ruth Kiselewich, Chair (REQ)
Business Practices Subcommittee: Phil Precht (RGQ), Mary Edwards and Dan Jones (REQ)
Information Requirements Subcommittee: Jennifer Teel (REQ)
Technical Electronic Implementation Subcommittee: TBD
Glossary Subcommittee: Don Sytsma (RGQ), Mary Edwards and Patrick Eynon (REQ)
DSM-EE Subcommittee: Ruth Kiselewich, David Koogler (REQ), Roy True (WEQ), and Paul Wattles (WEQ)
Retail Ad Hoc Texas Task Force: Debbie McKeever (REQ), Jennifer Teel (REQ), and Susan Munson (REQ)

(*) The Retail Ad Hoc Texas Task Force may draft MBPs, process flows, implementation guides and technical standards supportive of the Registration Agent.

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Retail 2009 Annual Plan End Notes:

[i] As outlined in the NAESB Bylaws, the REQ and RGQ will also address requests submitted by members and assigned to the REQ and RGQ through the Triage Process.

[ii] Dates in the completion column are by end of the quarter for completion by the assigned committee. 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.

[iii] The assignments are abbreviated. The abbreviations and committee structure can be found at the end of the annual plan document.

[iv] This work is considered routine maintenance and thus the items are not separately numbered. The REQ and RGQ ECs will assign maintenance efforts on a request-by-request basis.

[v] The ECs and the subcommittees can create task forces and working groups to support their development activities for development of model business practices and technical standards.

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NAESB Retail Structure Review Committee

At the request of the NAESB Board of Directors, the Retail Structure Review Committee met on December 10, 2008 to discuss the future of the Retail Quadrants. During this meeting, the participants discussed five potential solutions to the membership issues faced by both the Retail Gas and Retail Electric Quadrants. These solutions included: (1) merging the Retail Gas and Retail Electric Quadrants, (2) merging the Retail Quadrants and the Wholesale Quadrants, (3) indefinitely discontinuing the work of the Retail Quadrants or significantly restricting the work that will be undertaken by the Retail Quadrants, (4) dissolving the Retail Quadrants, or (5) continuing the existing structure for 2009-2010. The following resulted from that meeting:

Goals
The participants determined that the course of action pursued by the Organization should not conflict with the following overarching goals:

(1) The course of action should not negatively affect the overall membership of NAESB.

(2) The course of action should not negatively affect the current financial standing of the Organization.

(3) The course of action should increase the credibility of the membership and representation of the retail market.

(4) The course of action should strengthen the leadership of the organization and address the number of vacant Board and Executive Committee seats in both the Retail Gas and Retail Electric Quadrants.

Solutions
The participants reviewed the five courses of action outlined above and discussed how those courses of action relate to the overarching goals established by the participants.

Merging the Retail Gas and Retail Electric Quadrants: Based upon the current membership, if the Retail Quadrants merged, the combined membership of the two Quadrants would not satisfy the minimum requirements for a Quadrant established in the NAESB By-Laws. Also, it would become unnecessary for companies that currently hold memberships in both Quadrants to continue with multiple memberships. This would result in a reduction to the overall membership while not achieving the minimum membership goal in the By-Laws.

Merging the Retail Quadrants and the Wholesale Quadrants: The interests of the Wholesale Quadrants and Retail Quadrants are very different. As a result, members, whose interests lie within the Retail market or Wholesale market, would have to spend a significant amount of time addressing issues which are not applicable to their interests. This would diminish the value of membership within NAESB and damage the credibility of the Organization, as standards would be evaluated by members of unaffected markets.

Indefinitely discontinuing the work of the Retail Quadrants or significantly restricting the work that will be undertaken by the Retail Quadrants: This course of action would be appropriate if there is no further work of value to industry to be done by the Quadrants. The Retail industry's focus on business practice standards has shifted from those relating to customer choice and competition to those concerning DSM/EE programs. As such, the Retail Quadrants role in facilitating that standards development is significant and should not be discontinued or limited.

Dissolving the Retail Quadrants: See above

Continuing the existing structure for 2009-2010: The membership issues faced by the Retail Quadrants have been unresolved for several years. Given the condition of the current market and the Quadrant's potential for growth, it is in the Organizations best interest to take action to address the Quadrants issues and develop a sustainable structure within the Organization.

Suggested Course of Action
The Retail Structure Review Committee recommends that the Retail Quadrants focus development work on the emerging areas of energy efficiency and demand side management. As a result the current segment structure should

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be modified. The current segment structure of the Quadrants was appropriate for development of model business practices for customer choice and competition but is no longer appropriate given the shifting focus of the Quadrants' work.. The Quadrants could be restructured so that current members, including those holding Retail Board and Executive Committee seats, would be minimally affected, and more accurately represent the current Retail market activities. This course of action would satisfy the goals established by the Retail Structure Review Committee and lead to the sustainability of the Retail Quadrants.

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March 12, 2009
Filed Electronically

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street N.E., Room 1A
Washington, D.C. 20585

RE: Standards for Business Practices of Public Utilities (Docket No. RM 05-5 et al)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") herewith submits this report to the Federal Energy Regulatory Commission ("FERC" or "Commission") to supplement the February 19 Version 002.1[1] Wholesale Electric Quadrant ("WEQ") standards filing: "Standards for Business Practices of Public Utilities (Docket Nos. RM05-17-000 and RM05-5-000)."

This submittal completes the ratification record for the standards submitted on February 19, 2009. No new standards are included in this submittal.

The cover letter, report and enclosure are being filed electronically as a single document in Adobe Acrobat® Print Document Format (.pdf). The cover letter, report and enclosure are also provided in Microsoft Word 2003 format. The filing is also available on the NAESB web site (www.naesb.org). Please feel free to call me at (713) 356-0060 or refer to the NAESB website (www.naesb.org) should you have any questions or need additional information regarding the NAESB WEQ Version 002.1 standards.

Respectfully submitted,

Rae McQuade

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

[1] NAESB WEQ Version 002.1 Standards for Business Practices of Public Utilities, Docket Nos. RM05-17-000 and RM05-5-000, *available at* http://www.naesb.org/pdf4/ferc021909_weq_v002.1_with_appendices.pdf (submitted February 19, 2009).

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cc with enclosure:

Chairman Jon Wellinghoff, Federal Energy Regulatory Commission
Commissioner, Joseph Kelliher, Federal Energy Regulatory Commission
Commissioner Suedeen Kelly, Federal Energy Regulatory Commission
Commissioner Philip D. Moeller, Federal Energy Regulatory Commission
Commissioner Marc Spitzer, Federal Energy Regulatory Commission

Mr. Shelton Cannon, Director of Energy Market Regulations, Federal Energy Regulatory Commission
Ms. Cynthia Marlette, General Counsel of the Commission, Federal Energy Regulatory Commission
Mr. Joseph McClelland, Director, Office of Electric Reliability, Federal Energy Regulatory Commission

Mr. W. Mason Emnett, Office of General Counsel - Energy Markets, Federal Energy Regulatory Commission
Mr. Ryan Irwin, Office of Energy Market Regulation, Federal Energy Regulatory Commission
Mr. Michael Goldenberg, Senior Attorney, Office of General Counsel, Federal Energy Regulatory Commission
Ms. Valerie Roth, Office of Energy Market Regulation, Federal Energy Regulatory Commission

Mr. Michael Desselle, Chairman and CEO, North American Energy Standards Board
Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Mr. David Cook, General Counsel, North American Electric Reliability Corporation
Mr. Andrew Rodriquez, North American Electric Reliability Corporation

Enclosure (all documents and links available publicly on the NAESB web site – www.naesb.org):
Appendix B Ratification Ballots and Results Links

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Standards for Business Practices and	**)**	**Docket No. RM 05-17-000**
Communication Protocols for Public Utilities	**)**	**Docket No. RM 05-5-000**

REPORT OF THE NORTH AMERICAN ENERGY STANDARDS BOARD

The North American Energy Standards Board ("NAESB") is voluntarily submitting this supplemental report in accordance with the Commission's Order Nos. 890, 890-A and 890-B in the above referenced docket, as well as FERC Order No. 676. This report includes the results of the ratification and replaces Appendix B of the February 19, 2009 Version 002.1 Wholesale Electric Quadrant ("WEQ") standards filing. The results of the ratification address NAESB business practices related to the Commercial Timing Table (WEQ-004 Appendix D). The business practices were ratified according to the NAESB procedures on March 11, 2009. The standards can be downloaded from the NAESB home page (www.naesb.org).

Appendix B – Links to Ratification Ballots and Ratification Results			
Date of Ballot	Link to Ballot	Link to Ratification Results	Recommendations Ratified that Resulted in V002.1 Standards or Standard modifications
11-14-08	http://www.naesb.org/member_login_form.asp?doc=weq_rat111408ballot.doc	http://www.naesb.org/member_login_form.asp?doc=rat_weq121508tally.xls	Recommendation 2008 WEQ Annual Plan Item 2(b)(iii)(1-3) http://www.naesb.org/member_login_form.asp?doc=weq_rat111408_2008_weq_api_2biii_1_3_rec_redline.doc (Redline) http://www.naesb.org/member_login_form.asp?doc=weq_rat111408_2008_weq_api_2biii_1_3_rec_clean.doc (Clean) Final Action: http://www.naesb.org/member_login_form.asp?doc=fa_2008_weq_api_2biii_1_3.doc
12-11-08	http://www.naesb.org/member_login_form.asp?doc=weq_rat121108ballot.doc	http://www.naesb.org/member_login_form.asp?doc=rat_weq011209tally.xls	Recommendation 2008 WEQ Annual Plan Items 2(a)(iv)(3), 3(a)(vii), and 6(l) http://www.naesb.org/member_login_form.asp?doc=weq_rat121108_weq_2008_api_2aiv3_3avii_6l_rec_redline.doc (Redline) http://www.naesb.org/member_login_form.asp?doc=weq_rat121108_weq_2008_api_2aiv3_3avii_6l_rec_clean.doc (Clean) Final Action: http://www.naesb.org/member_login_form.asp?doc=fa_weq_2008_api_2aiv3_3avii_6l.doc
12-11-08	http://www.naesb.org/member_login_form.asp?doc=weq_rat121108ballot.doc	http://www.naesb.org/member_login_form.asp?doc=rat_weq011209tally.xls	Recommendation 2008 WEQ Annual Plan Item 1a(ii) http://www.naesb.org/member_login_form.asp?doc=weq_rat121108_weq_2008_api_1aii_rec_redline.doc (Redline) http://www.naesb.org/member_login_form.asp?doc=weq_rat121108_weq_2008_api_1aii_rec_clean.doc (Clean) Final Action: http://www.naesb.org/member_login_form.asp?doc=fa_weq_2008_api_1aii.doc
2-9-09	http://www.naesb.org/member_login_form.asp?doc=weq_rat020909ballot.doc	http://naesb.org/member_login_form.asp?doc=rat_weq031109tally.xls	Recommendation 2008 WEQ Annual Plan Item 6.m/R07007 http://www.naesb.org/member_login_form.asp?doc=weq_rat020909_weq_2008_api_6m_r07007_rec_redline.doc (Redline) http://www.naesb.org/member_login_form.asp?doc=weq_rat020909_weq_2008_api_6m_r07007_rec_clean.doc (Clean) Final Action: http://naesb.org/member_login_form.asp?doc=fa_weq_2008_api_6m_r07007.doc

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April 17, 2009

Filed Electronically

Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street N.E., Room 1A
Washington, D.C. 20585

RE: Submittal for "Measurement and Verification of Demand Response Products" (Docket No. RM05-5-000)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") submits this report to the Federal Energy Regulatory Commission ("FERC" or "Commission") regarding the measurement and verification of demand response products and services administered in wholesale electricity markets. . This NAESB report is voluntarily submitted by NAESB in response to Docket Nos. RM05-5-000. The NAESB standards related to the measurement and verification of demand response products and services were ratified by NAESB membership on March 16, 2009 and became available as final actions. We very much appreciate the time, knowledge and industry leadership provided by all participants, both members and non-members and look forward to the further development of demand side management and energy efficiency business practice standards.

The report is being filed electronically in Adobe Acrobat® Print Document Format (.pdf). All of the documents are also available on the NAESB web site (www.naesb.org). Please feel free to call me at (713) 356-0060 or refer to the NAESB website (www.naesb.org) should you have any questions or need additional information regarding the NAESB DSM-EE standards or any other NAESB work products.

Respectfully submitted,

Rae McQuade

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

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cc with enclosures:

Chairman Jon Wellinghoff, Federal Energy Regulatory Commission
Commissioner Suedeen Kelly, Federal Energy Regulatory Commission
Commissioner Philip D. Moeller, Federal Energy Regulatory Commission
Commissioner Marc Spitzer, Federal Energy Regulatory Commission

Mr. Shelton Cannon, Director of Energy Market Regulations, Federal Energy Regulatory Commission
Ms. Cynthia Marlette, General Counsel of the Commission, Federal Energy Regulatory Commission
Mr. Joseph McClelland, Director, Office of Electric Reliability, Federal Energy Regulatory Commission

Mr. W. Mason Emnett, Office of General Counsel - Energy Markets, Federal Energy Regulatory Commission
Mr. Michael Goldenberg, Senior Attorney, Office of General Counsel, Federal Energy Regulatory Commission
Mr. Ryan Irwin, Office of Energy Market Regulation, Federal Energy Regulatory Commission
Mr. David Kathan, Office of Energy Market Regulation, Federal Energy Regulatory Commission
Mr. William Lohrman, Office of Energy Market Regulation, Federal Energy Regulatory Commission
Ms. Valerie Roth, Office of Energy Market Regulation, Federal Energy Regulatory Commission

Mr. Michael Desselle, Chairman and CEO, North American Energy Standards Board
Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Mr. David Cook, General Counsel, North American Electric Reliability Corporation

Enclosures (all documents noted in the appendices are available publicly on the NAESB web site – www.naesb.org):

Appendix A	DSM-EE Distribution List
Appendix B	WEQ/Retail DSM-EE Subcommittee Meeting Minutes Links
Appendix C	Executive Committee Meeting Minutes, Comments, Voting Records Links and Availability of Transcripts
Appendix D	Ratification Ballots and Results Links
Appendix E	2008 Wholesale Electric Quadrant Annual Plan
Appendix F	2009 Wholesale Electric Quadrant Annual Plan
Appendix G	NAESB Process for Standards Development

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Standards for Business Practice and Communication Protocols for Public Utilities	)))	**Docket No. RM05-5-000**

REPORT OF THE NORTH AMERICAN ENERGY STANDARDS BOARD

The North American Energy Standards Board ("NAESB") is voluntarily submitting this report in accordance with the Commission's Orders in the above referenced dockets.

The NAESB Demand Side Management – Energy Efficiency ("DSM-EE") subcommittee meetings and Wholesale Electric Quadrant ("WEQ") Executive Committee ("EC") meetings where these standards[1] were drafted, discussed and adopted took place from July 2007 to December 2008. There were nine subcommittee meetings and various working group meetings, focused solely on DSM-EE issues and specifically in this first phase, on the measurement and verification aspects of demand response products and services. There were ten WEQ EC meetings where the Demand Side Management ("DSM") standards development effort was discussed as one of the agenda topics. All meetings were open to all interested parties and were publicly noticed, and were available by phone and web cast for those unable to travel. The meetings were held in various locations, diverse geographically. Any interested party was encouraged to submit comments if their schedules would not permit them to participate either in person or over the phone/web cast. The minutes of these meetings are provided as links in Appendices B and C, which include the voting record of the WEQ EC, and include all comments filed as part of the formal comment period for the proposed DSM standards. Appendix A includes the DSM-EE distribution list sorted by organization and participant name. The ratification ballots and member ratification voting record results are also included as links in Appendix D. The 2008 and 2009 WEQ Annual Plans are contained in Appendices E and F, respectively. An abbreviated review of the NAESB process by which the standards were drafted, considered and adopted is provided in Appendix G. More detailed process descriptions can be accessed from the NAESB web site.

During the development of the DSM-EE request, the group understood that the standards would reflect the efforts of multiple quadrants and market interests. In review of the DSM-EE scope, the group agreed to focus initially on demand response products and services[2] and the measurement and verification aspects of such. The wholesale and retail electric and retail gas market interests participated in the development of the standards – including many participants who do not hold membership in NAESB. NAESB coordinated its work efforts with the North American Electric Reliability Corporation ("NERC"), as NERC had undertaken a similar development activity. During the development, it was determined that the retail gas participation was more of a role of monitoring,[3] and that the standards to be developed were solely wholesale electric and retail electric quadrant work products. All interested parties regardless of membership in NAESB were encouraged to participate, as they are in all NAESB meetings, to provide the broadest possible input from the industry, as work products are prepared. Appendix A

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[1] NAESB WEQ Annual Plan 5(a) Final Action: Review and develop business practice standards to support DR and DSM-EE programs, Ratified March 16, 2009, *available at* http://www.naesb.org/member_login_form.asp?doc=fa_weq_2008_api5a.doc

[2] NAESB DSM-EE subcommittee Meeting Minutes, *available at* http://www.naesb.org/pdf2/dsmee041107fm.doc, (April 11, 2007).

[3] NAESB Board of Directors Meeting Minutes, *available at* http://www.naesb.org/pdf4/bd032609dm.doc, (March 26, 2009).

provides the distribution list for DSM-EE materials, and all meeting materials are posted on the web site[4] for any interested party to access.

On December 2, 2008, the DSM-EE subcommittee voted out its recommendation with significant support from all segments of the wholesale electric quadrant.[5, 6] The recommendation was sent out for a thirty-day industry comment on December 4, 2008 and twelve comments were received.[7] The comments were considered by the WEQ EC on January 27, 2009[8] and the DSM-EE subcommittee chairs provided a review that gave additional context to the standards. During the WEQ EC discussion it was noted that more technical standards would be needed to support the standards provided in the recommendation. All WEQ EC members agreed to have a follow-up development effort to provide additional technical context to the standards. The WEQ EC voted on January 27, 2009 with notational ballots due on February 10, 2009 for absent EC members, to approve the recommendation, passing the EC with the needed super-majority threshold of 67% and a minimum of 40% affirmative votes from each segment, receiving 70.7% overall including meeting the segment threshold. No negative votes were received, (abstentions counted for the less than 100% affirmative vote reported). The recommendation was then ratified by the WEQ members on March 16, 2009[9] after a thirty-day ratification period, garnering 100%, clearly exceeding the super-majority threshold of 67%.

The WEQ demand response standards[10] include forty definitions and thirty-one business practice standards. They address the measurement and verification characteristics of demand response products and services administered for application in the wholesale electricity market. They are intended to provide a common framework for transparency (accessible and understandable measurement and verification requirements for demand response products and services), accountability (criteria that will enable the system operator to accurately measure the performance of demand response resources), and consistency (standards applicable across all wholesale electricity markets). The standards address four product/service categories (energy service, capacity service, reserve service and regulation service), and establish criteria for the use of equipment, technology and procedures to quantify the demand reduction value delivered.. The standards are now considered a final action[11] and are accessible as a final action from the NAESB web site. They will be included in our next publication, WEQ Version 2.2, currently slated for first quarter 2010.

As a follow-up, the DSM-EE subcommittee has begun efforts to scope the development of more detailed technical standards for the measurement and verification of demand response products and services in ISO-RTO footprint areas. A new wholesale electric work group will meet on April 16, 2009 to begin the scoping effort for the more technical standards development. WEQ/Retail DSM-EE subcommittee meetings have been scheduled for May 29, July 29 and September 29, during which the products of the retail task force and new wholesale task force will be reviewed, possibly modified and approved. The retail efforts are proceeding and the retail task force is using the wholesale standards as a foundation for their work products. It is expected that NAESB would have retail electric work products supportive of the wholesale work products by second quarter 2009.

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[4] NAESB WEQ DSM-EE webpage, available at http://www.naesb.org/dsm-ee.asp

[5] NAESB DSM-EE Subcommittee Meeting Minutes, *available at* http://www.naesb.org/pdf4/dsmee120208dm.doc, December 2, 2008, (Motion to adopt the recommendation made by John Hughes of Electricity Consumers Resource Council and seconded by Eric Winkler of ISO New England, both of whom voted in support of the recommended standards).

[6] A significant provision of the wholesale market demand response measurement and verification standards sent to the WEQ EC was the provision that the standards are only applicable to ISO-RTO areas and that non ISO-RTO areas shall develop wholesale market demand response measurement and verification standards as needed in the future. NAESB did not identify any wholesale market demand response products and services that were not administered by ISOs or RTOs.

[7] WEQ Request for Comments, *available at* http://www.naesb.org/weq_request.asp. The comments are located in the row titled, 2009 WEQ Annual Plan Item 5(a).

[8] NAESB WEQ Executive Committee Meeting Minutes, *available at* http://www.naesb.org/pdf4/weq_ec012709dm.doc, January 27, 2009.

9 WEQ Member Ratification of the wholesale M&V standards, *available at* http://www.naesb.org/ratification.asp. The ratification tally is located on the row dated February 12, 2009.

[10] NAESB WEQ Annual Plan 5(a) Final Action: Review and develop business practice standards to support DR and DSM-EE programs, Ratified March 16, 2009, *available at* http://www.naesb.org/member_login_form.asp?doc=fa_weq_2008_api5a.doc

[11] *Id*.

This report is intended solely as a status report from NAESB regarding the DSM-EE subcommittee process, issues and standards. NAESB does not advocate that the Commission take a particular position on any of the issues presented.

Appendix A
DSM-EE Distribution List – Sorted by Organization

Jeb Bartley, Accenture
Amadou Fall, ACES Power Marketing, LLC
Roy True, ACES Power Marketing
H. Neal Allen, Alabama Power Company
Judy W. Ray, Alabama Power Company
David P. Johnson, Allegheny Energy, Inc.
Cynthia A. Menhorn, Allegheny Energy
Terri Grabiak, Allegheny Power
Cassandra Robinson, Allegheny Power
Thomas Rone, Allegheny Power
Jason J. Wojciechowicz, Allegheny Power
Steve Capanna, Alliance to Save Energy
Joe Loper, Alliance to Save Energy
Lonni Dieck, American Electric Power
Sherri Monteith, American Electric Power
Mariam Arnaout, American Gas Association (AGA)
J.P. Blackford, American Public Power Association
Allen Mosher, American Public Power Association
S Balakrishnan, ANB Enterprises, Inc.
Bob Gray, Arizona Corporation Commission
Kent Walter, Arizona Public Service
Meg Matt, Association of Energy Services Professionals (AESP)
Bob Rowe, Balhoff & Rowe, LLC
Howard H. Shafferman, Ballard Spahr Andrews & Ingersoll, LLP
David Kelly, Baltimore Gas and Electric
Ruth Kiselewich, Baltimore Gas and Electric
Jeanie Nathaniel, Baltimore Gas and Electric
Phil Precht, Baltimore Gas and Electric
Mary Straub, Baltimore Gas and Electric
William Wolf, Baltimore Gas and Electric
Yolanda Mason, Bayboro EC, Inc.
Vicky A. Bailey, BHMM Energy Services, LLC
Pamela Sporborg, Bonneville Power Administratioin
Ken Keating, Bonneville Power Authority
Rodereck Kelley, Bonneville Power Authority
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Jay Zarnikau, Frontier Associates
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Appendix B – DSM-EE Subcommittee Meeting Minutes Links			
Date of Meeting	Meeting Location	Meeting Minutes	Number of Participants
July 26, 2007	DSM-EE Meeting, Washington, DC Hosted by the American Gas Association	Meeting Minutes: http://www.naesb.org/pdf3/dsmee072607fm.doc	53
September 25, 2007	DSM-EE Meeting, Austin, TX Hosted by ERCOT	Meeting Minutes: http://www.naesb.org/pdf3/dsmee092507fm.doc	54
November 20, 2007	DSM-EE Group 1, Preamble, Working Session, Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf3/dsmee112707mn.doc	99
November 20, 2007	DSM-EE Group 3, Wholesale Electric, Working Session, Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf3/dsmee112007mn.doc	72
November 26, 2007	DSM-EE Group 4, Glossary, Working Session, Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf3/dsmee112607mn.doc	100
November 30, 2007	DSM-EE Meeting, Richmond, VA Hosted by Dominion	Meeting Minutes: http://www.naesb.org/pdf3/dsmee113007fm.doc	65
December 17, 2007	DSM-EE Group 4, Glossary, Working Session, Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf3/dsmee121707mn.doc	89
January 17, 2008	DSM-EE Group 1, Preamble, Working Session, Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf3/dsmee_group1_011708mn.doc	50
January 21, 2008	DSM-EE Group 4, Glossary, Working Session, Conference Call with Web Conferencing	Meeting Notes: http://www.naesb.org/pdf3/dsmee_group4_012108mn.doc	43
January 23, 2008	DSM-EE Meeting, Baltimore, MD Hosted by Baltimore Gas and Electric	Meeting Minutes: http://www.naesb.org/pdf3/dsmee012308fm.doc	36
March 28, 2008	DSM-EE Meeting, Houston, TX Hosted by NAESB Office	Meeting Minutes: http://www.naesb.org/pdf3/dsmee032808fm.doc	56
May 30, 2008	DSM-EE Meeting, Houston, TX Hosted by NAESB Office	Meeting Minutes: http://www.naesb.org/pdf3/dsmee053008fm.doc	30
July 30, 2008	DSM-EE Meeting, Houston, TX Hosted by NAESB Office	Meeting Minutes: http://www.naesb.org/pdf3/dsmee073008fm.doc	41
August 21, 2008	DSM-EE Group 1, Preamble, Working Session, Conference Call with Web Conferencing	Meeting Minutes: http://www.naesb.org/pdf3/dsmee_glossary_preamble_082108mn.doc	23
October 3, 2008	DSM-EE Meeting, Austin, TX	Meeting Minutes:	22

Appendix B – DSM-EE Subcommittee Meeting Minutes Links			
Date of Meeting	Meeting Location	Meeting Minutes	Number of Participants
	Hosted by ERCOT	http://www.naesb.org/pdf4/dsmee100308fm.doc Attachment to Minutes: http://www.naesb.org/pdf3/dsmee100308a1.doc	
December 2, 2008	DSM-EE Meeting, Birmingham, AL Hosted by Alabama Power	Meeting Minutes: Attachment to the Minutes: http://www.naesb.org/pdf4/dsmee120208a2.doc http://www.naesb.org/pdf4/dsmee120208a1.doc http://www.naesb.org/pdf4/dsmee120208a3.doc	52

Appendix C – Executive Committee Meeting Minutes, Comments, Voting Records Links and Availability of Transcripts			
Date	Link to EC Minutes and Voting Records	Link to Comments	Availability of Transcripts[12]
May 8-10, 2007	NAESB Executive Committee Meetings, Washington, DC WEQ EC Minutes: http://naesb.org/pdf2/weq_ec050807fm.doc	No comments requested or provided related to the WEQ DR standards.	Ace Federal Reporters - 202-347-3700
August 14, 2007	NAESB Executive Committee Meetings, Colorado Springs, CO WEQ EC Minutes: http://www.naesb.org/pdf3/weq_ec081407fm.doc	No comments requested or provided related to the WEQ DR standards.	Court Reporter's Clearinghouse - 713-626-2629
November 6-8, 2007	NAESB Executive Committee Meetings, Houston, TX WEQ EC Minutes: http://naesb.org/pdf3/weq_ec110607fm.doc	No comments requested or provided related to the WEQ DR standards.	Preferred Legal - 800-405-4056
February 4, 2008	NAESB Executive Committee Meetings, Houston, TX WEQ EC Minutes: http://www.naesb.org/pdf3/weq_ec020408fm.doc	No comments requested or provided related to the WEQ DR standards.	Preferred Legal – 800-405-4056
May 13, 2008	NAESB Executive Committee Meetings, Washington, DC WEQ EC Minutes: http://www.naesb.org/pdf3/weq_ec051308fm.doc	No comments requested or provided related to the WEQ DR standards.	Ace Federal Reporters - 202-347-3700
August 19, 2008	NAESB Executive Committee Meetings, Colorado Springs, CO WEQ EC Minutes: http://www.naesb.org/pdf4/weq_ec081908fm.doc	No comments requested or provided related to the WEQ DR standards.	Jill Webb, CSR – 281-853-6807
November 4, 2008	NAESB Executive Committee Meetings, Glen Allen, VA WEQ EC Minutes: http://www.naesb.org/pdf4/weq_ec110408fm.doc	No comments requested or provided related to the WEQ DR standards.	Preferred Legal – 800-405-4056
January 14, 2009	WEQ Executive Committee Single Topic Review Session WEQ EC Minutes:	No comments requested or provided related to the WEQ DR standards.	No transcripts provided for review sessions.
February 3, 2009	WEQ Executive Committee Meetings, Phoenix, AZ WEQ EC Minutes: http://www.naesb.org/pdf4/weq_ec020309dm.doc	No comments requested or provided related to the WEQ DR standards.	Preferred Legal – 800-405-4056
December 4, 2008	Request for Comments Due January 12, 2009: http://www.naesb.org/pdf4/weq_2008_api_5a_rec.doc	NAESB Standards Review Subcommittee: http://www.naesb.org/pdf4/weq_120408_srs.doc EnerNOC: http://www.naesb.org/pdf4/weq_120408_enernoc.pdf IRC SRC: http://www.naesb.org/pdf4/weq_120408_src.doc Attachment to IRC SRC Comments:	No transcripts provided as this was not a meeting – it was a request for comments.

[12] The Federal Energy Regulatory Commission and other regulatory agencies may contact 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 – Executive Committee Meeting Minutes, Comments, Voting Records Links and Availability of Transcripts			
Date	Link to EC Minutes and Voting Records	Link to Comments	Availability of Transcripts[12]
		http://www.naesb.org/pdf4/weq_120408_src_attachment.doc EVO: http://www.naesb.org/pdf4/weq_120408_evo.pdf ELCON: http://www.naesb.org/pdf4/weq_120408_elcon.doc Entergy: http://www.naesb.org/pdf4/weq_120408_entergy.doc Attachment A to Entergy Comments: http://www.naesb.org/pdf4/weq_120408_entergyA.doc Attachment B to Entergy Comments: http://www.naesb.org/pdf4/weq_120408_entergyB.doc Con Edison: http://www.naesb.org/pdf4/weq_120408_conedison.doc Southern Company Transmission: http://www.naesb.org/pdf4/weq_120408_southernco.pdf NYS Department of Public Service: http://www.naesb.org/pdf4/weq_120408_nys_psc.doc Energy Curtailment Specialist, Inc.: http://www.naesb.org/pdf4/weq_120408_energy_csi.pdf National Rural Electric Cooperative Association: http://www.naesb.org/pdf4/weq_120408_nreca.pdf	
January 27, 2009	WEQ Executive Committee Meeting WEQ EC Minutes: Attachment to the Minutes:	NAESB Standards Review Subcommittee: http://www.naesb.org/pdf4/weq_ec012709w1.doc EnerNOC: http://www.naesb.org/pdf4/weq_ec012709w2.pdf	Jill Webb, CSR – 281-853-6807

Appendix C – Executive Committee Meeting Minutes, Comments, Voting Records Links and Availability of Transcripts			
Date	Link to EC Minutes and Voting Records	Link to Comments	Availability of Transcripts[12]
	Recommendation: http://www.naesb.org/pdf4/weq_ec012709a2.doc Recommendation (redlined): http://www.naesb.org/pdf4/weq_ec012709a1.doc Meeting Motions: http://www.naesb.org/pdf4/weq_ec012709a3.doc Notational Ballot: http://www.naesb.org/pdf4/weq_ec012709ballot.doc WEQ EC Voting Record:	IRC SRC: http://www.naesb.org/pdf4/weq_ec012709w3.doc Attachment to IRC SRC Comments: http://www.naesb.org/pdf4/weq_ec012709w4.doc EVO: http://www.naesb.org/pdf4/weq_ec012709w5.pdf ELCON: http://www.naesb.org/pdf4/weq_ec012709w6.doc Entergy: http://www.naesb.org/pdf4/weq_ec012709w7.doc Attachment A to Entergy Comments: http://www.naesb.org/pdf4/weq_ec012709w8.doc Attachment B to Entergy Comments: http://www.naesb.org/pdf4/weq_ec012709w9.doc Con Edison: http://www.naesb.org/pdf4/weq_ec012709w10.doc Southern Company Transmission: http://www.naesb.org/pdf4/weq_ec012709w11.pdf NYS Dept. of Public Service: http://www.naesb.org/pdf4/weq_ec012709w12.doc Energy Curtailment Specialists, Inc.: http://www.naesb.org/pdf4/weq_ec012709w13.pdf National Rural Electric Cooperative Association: http://www.naesb.org/pdf4/weq_ec012709w14.pdf Southern Company: http://www.naesb.org/pdf4/weq_ec012709ballot_southern.pdf	

Appendix D – Ratification Ballots and Results Links			
Date of Ratification	Ratification Ballot	Results	Final Actions
March 16, 2009	Ratification Ballot Due March 16, 2009: http://www.naesb.org/member_login_check.asp?doc=weq_rat021209ballot.doc Recommendation: 2008 WEQ Annual Plan Item 5(a) - Review and develop business practice standards to support DR and DSM-EE programs. Revised and approved by the WEQ EC on February 10, 2009 (clean): http://www.naesb.org/member_login_check.asp?doc=weq_rat021209_weq_2008_api5a_rec_clean.doc Recommendation: 2008 WEQ Annual Plan Item 5(a) - Review and develop business practice standards to support DR and DSM-EE programs. Revised and approved by the WEQ EC on February 10, 2009 (redline): http://www.naesb.org/member_login_check.asp?doc=weq_rat021209_weq_2008_api5a_rec_redline.doc	Ratification Tally: http://www.naesb.org/member_login_check.asp?doc=rat_weq031609tally.xls Comments submitted by EnerNOC: http://www.naesb.org/pdf4/weq_rat031609_enernoc.doc	2008 WEQ Annual Plan Item 5(a) Final Action: Review and develop business practice standards to support DR and DSM-EE programs: http://www.naesb.org/member_login_check.asp?doc=fa_weq_2008_api5a.doc

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	Item Description	Completion[1]	Assignment[2]
1	**Develop business practices standards as needed to complement reliability standards**		
	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) Make version 2 changes to business practices as requested.		
	i) Make changes to business practices as related to inclusion of the NERC Reliability Functional Model functional model entities as NERC undertakes the same efforts. Status: No requests	As requested	BPS
	ii) Continuous support of TLR Procedure in alignment with NERC efforts on TLR Phase II and Phase III which would be included in version 2 development.[3] Status: Complete The "Continuous Support of TLR Procedure in Alignment with NERC Efforts on Phase II and Phase III" recommendation was approved by the BPS to post for the formal comment period. For 2009 specific items for TLR coordination with NERC will be added as needed.	3rd Q, 2008	BPS[4]
	b) Develop business practices to support Coordinate Interchange – R05020 "Include a guideline for rounding schedules with partial mWh's in the coordinate interchange business practice WEQ BPS-002-000" Status: Underway	3rd Q, 2009	JISWG
	c) Operate Within Limits (R03017) as coordinated with the NERC schedule on the same development for reliability standards		
	i) Review the need to develop business practice standards to support Operate Within Limits (R03017) Status: Completed	1st Q, 2008	SRS
	ii) Develop business practice standards to support Operate Within Limits (R03017) Status: Completed No standards are needed at this time	2nd Q, 2008	BPS

End Notes WEQ 2008 Annual Plan:

[1] Dates in the completion column are by end of the quarter for completion by the assigned committee. 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.

[2] The assignments are abbreviated. The abbreviations and committee structure can be found at the end of the annual plan document.

[3] For additional information, please see: http://www.naesb.org/pdf3/weq_bps100407w4.ppt for Phase II changes and http://www.naesb.org/pdf2/weq_bps070907w4.doc for Phase III changes.

[4] Joint Development Procedure is to be used by the NERC TLR Drafting Team and NAESB BPS.

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	Item Description	Completion[1]	Assignment[2]
d)	Prepare recommendations for future path for TLR in concert with NERC, which may include alternative congestion management procedures[5] Status: Underway	2009	BPS[6]
e)	Conduct analysis as to whether standards can be developed which outline a standardized process for the coordination and execution of emergency energy schedules. These would be complementary standards to EOP-002-2 Requirements R4 and R6 (SRS Analysis of EOP-002-2 R4 & R6) Status: Not Started	1st Q, 2009	JISWG
f)	Review Market System Back-Up existing language and review of existing back-up language Status: Completed Per the guidance from the WEQ Executive Committee after presenting the Request for Executive Committee Guidance on WEQ 2008 Provisional Item 5 the SRS developed and approved a "no action" recommendation to close out this annual plan item	4th Q, 2008	SRS
g)	Provide complementary business practice standards to support Coordinate Operations Standards Authorization Request assigned to NERC (R03014) Status: Completed Based on the SRS review of related documents and EC updates to the WEQ Annual Plan in May 2004 where R03014 was noted as completed the SRS approved a "no action" recommendation to close out this standards request.	3rd Q, 2008	SRS
2	**Develop business practice standards in support of the FERC RM05-25-000 and RM05-17-000 (OATT Reform)**		
a)	Develop version 2 business practice standards to better coordinate the use of the transmission system among neighboring transmission providers. Such business practice standards would be based on recommendations from NERC's Long Term ATC/AFC Task Force and would involve revised procedures for the ATC calculation and/or revised protocols as determined by the final order. Status: Underway Development is using joint standards development process with NERC. Request R050004 was expanded to include the Order No. 890 (Docket Nos. RM05-25-000 and RM05-17-000) and Order No. 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002), "Preventing Undue Discrimination and Preference in Transmission Services", issued April 11, 2007).		
i)	Group 1: Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority		
1.	Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority S&CP Requirements Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	4th Q, 2007	ESS/ITS

[5] For additional information, please see comments submitted by PJM and MISO for this Annual Plan Item: http://www.naesb.org/pdf3/weq_aplan102907w1.pdf.

[6] Joint Development Procedure is to be used by the NERC TLR Drafting Team and NAESB BPS.

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		Item Description	Completion[1]	Assignment[2]
	2.	Conditional Firm Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	3rd Q, 2008	ESS/ITS
	3.	Annotations For ATC Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	BPS, ESS/ITS
	4.	Load Forecast And Actual Load Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	BPS, ESS/ITS
	5.	Re-Bid Of Partial Service Business Practice Standards on a Single Transmission Provider's System associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	ESS/ITS
	6.	Preconfirmation Priority Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	ESS/ITS
	7.	OASIS Exemptions Appendix Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	4th Q, 2007	ESS/ITS
ii)		Group 2: Metrics; Redispatch Cost Posting		
	1.	Metrics Related to Provision of Transmission Service (Paragraph 413 of Order 890) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	ESS/ITS
	2.	Metrics Related to Performance of Transmission Studies (Paragraphs 1308 through 1317 of Order 890 Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
	3. Redispatch Cost Posting • Monthly average cost of redispatch • A high and low redispatch for the month Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	ESS/ITS
iii)	Group 3: Network Service On OASIS		
	1. Use of OASIS to Make Electronic Requests to Designate and Terminate Network Resource Status: Underway	1St Q, 2009	ESS/ITS
	2. Ability to Query Requests to Designate and Terminate Network Resources and Allow for Queries of All Information Provided with Designation Requests Status: Underway	1St Q, 2009	ESS/ITS
	3. Masking of Designated Network Resource Operating Restrictions and Generating Cost Information Status: Underway	1St Q, 2009	ESS/ITS
	4. Procedural Requirements for Submitting Designations over new OASIS Functionality Status: Underway	1St Q, 2009	ESS/ITS
	5. Specify How Designated Network Service Informational Postings are Posted on OASIS Status: Underway	1St Q, 2009	ESS/ITS
	6. Set Forth the Treatment of OASIS Requests when the Customer Fails to Provide the Necessary Attestation Status: Underway	1St Q, 2009	ESS/ITS
	7. Procedural Requirements for Submitting Both Temporary and Indefinite Terminations of Network Resources Status: Underway	1St Q, 2009	ESS/ITS
	8. Procedures for Submitting and Processing Requests for Concomitant Evaluations of Transmission Requests and Temporary Terminations Status: Underway	1St Q, 2009	ESS/ITS
iv)	Group 4: Pre-Emption; Request No. R05019; and Revisions to Standard 9.7		
	1. Pre-Emption Status: Not Started	2nd Q, 2009	ESS/ITS
	2. Request No. R05019 Status: Not Started	2nd Q, 2009	ESS/ITS

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Item Description	Completion[1]	Assignment[2]
3. Revisions to Standard 9.7 Status: Underway This item also addresses work in 2006 WEQ AP 3a(x).	2009	EC Task Force
4. Posting of Existing Transmission Commitments (ETC) (moved from Group 1) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	2nd Q, 2008	BPS, ESS/ITS
v) Group 5: Paragraph 1377		
1. Paragraph 1377 Status: Not Started	2nd Q, 2009	ESS/ITS
2. Re-Bid Of Partial Service across Multiple Transmission Providers' Systems Status: Not Started	2nd Q, 2009	ESS/ITS
vi) Group 6: Miscellaneous (Paragraphs 1390 and 1627 of Order 890)		
1. Paragraph 1390 of Order 890 Status: Not Started	2nd Q, 2009	ESS/ITS
2. Paragraphs 1627 of Order 890 Status: Not Started	2nd Q, 2009	ESS/ITS
3. Redispatch Cost Posting to allow for posting of third party offers of planning redispatch services. Status: Not Started	2nd Q, 2009	ESS/ITS
4. Posting of **Existing Transmission Commitments (ETC)** (moved from Group 1) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	2nd Q, 2008	ESS/ITS
vii) Group 7: Tagging for Conditional Firm Service		
1. Tagging for Conditional Firm Service Status: Completed Published Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	2nd Q, 2008	ESS/ITS
b) Develop the needed business practices as companion to the NERC standards for ATC related efforts.[7]		
i) Develop standards to support existing Request No. R05004.		

[7] The June 1, 2008 dates included in this Annual Plan Item are assigned as a result of FERC extending deadlines to both NERC and NAESB on ATC related Order No. 890 items.

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	Item Description	Completion[1]	Assignment[2]
	1. The processing of transmission service requests, which use TTC/ATC/AFC, in coordination with NERC changes to MOD 001 where the allocation of flowgate capability based on historical Network Native Load impacts the evaluation of transmission service requests, requiring the posting of those allocation values in conjunction with queries of service offerings on OASIS Status: Underway	1St Q, 2009	ESS/ITS
	2. Remaining requirements documented in R05004 and R05004A. Status: Completed	3rd Q, 2008	BPS, ESS/ITS
ii)	Develop Business Practice Standards for **Existing Transmission Commitments (ETC)**		
	1. Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	2nd Q, 2008	BPS, ESS/ITS
	2. Business practice standards for accounting for counterflows. These standards will be included in the ATC business practice standards. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	June 1, 2008	BPS ESS/ITS
iii)	**Capacity Benefit Margin (CBM) Business Practices**		
	1. Determine if business practice standards are needed, and if so, develop them to set forth "how the CBM value shall be determined, allocated across transmission paths, and used" and how transmission providers will "reflect the set-aside of transfer capability as CBM in the development of the rate for point-to-point transmission service." The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed The NAESB subcommittees have determined the CBM requirements have been documented in the NERC MOD-004 to address this item, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.	3rd Q, 2008	BPS, ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
	2. Business practice standards that include an OASIS mechanism to "allow for auditing of CBM usage." The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed	3rd Q, 2008	BPS, ESS/ITS
	3. Any additional business practice standards needed to complement the NERC CBM reliability standards (MOD004) created as a result of this effort. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed	3rd Q, 2008	BPS, ESS/ITS
iv)	**Transmission Reliability Margin Business Practices:**		
	1. Transmission Reliability Margin (TRM): Business Practice Standards to complement the NERC reliability standards for TRM. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed The NAESB subcommittees have determined TRM requirements have been documented in previously submitted recommendations, so no further action is required by NAESB.	April 8, 2008	BPS, ESS/ITS
	2. The business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development Status: Completed The NAESB subcommittees have determined TRM requirements have been documented in previously submitted recommendations, so no further action is required by NAESB.	April 8, 2008	BPS, ESS/ITS
	3. Any additional business practice standards needed to complement the NERC TRM reliability standards (MOD008) created as a result of this effort. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed The NAESB subcommittees have determined TRM requirements have been documented in previously submitted recommendations, so no further action is required by NAESB.	April 8, 2008	BPS, ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
v)	Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)):		
	1. Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed The subcommittee determined no additional standards are required from what is already documented in the "ATC Information Link (2008 Annual Plan 2.b.vii)" recommendation and what is required for ATC postings under the previously ratified recommendation "Modifications to WEQ-001 to comply with modifications to 18 C.F.R. 37.6 and 37.7 within Order 890 with Minor Corrections applied on February 27, 2008."	April 23, 2008	BPS/ESS/ITS
	2. Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards including any OASIS posting requirements to achieve the data exchange. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed The NAESB subcommittees have determined the data exchange requirements have already been documented in the NERC standards, so no further action is required by NAESB.	1st Q, 2008	BPS/ESS/ITS
	3. Business practice standards that will set forth how transmission providers will post "explanations of the reason for a change in monthly and yearly ATC values on a constrained path." The standards will include a requirement that that the transmission provider posts the reason for the change in a narrative form. The posted information will include "the (1) specific events which gave rise to the change and (2) new values for ATC on that path (as opposed to all points on the network)." The business practices developed to address this item will not require to coordination with the NERC Order 890 reliability standards development. Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	BPS/ESS/ITS
	4. Business practice standards for posting on OASIS of the "underlying load forecast assumptions for all ATC calculations". The business practices developed to address this item will not require to coordination with the NERC Order 890 reliability standards development Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	BPS/ESS/ITS

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		Item Description	Completion[1]	Assignment[2]
		5. Business practice standards for posting on OASIS of the "actual daily peak load for the prior day." The business practices developed to address this item will not require to coordination with the NERC Order 890 reliability standards development Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	BPS/ESS/ITS
	vi)	Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13 This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development. Status: Completed	May 1, 2008	BPS, ESS/ITS
	vii)	Business practice standards to set forth the procedure for input on TTC and ATC methodologies and values. (During the Order 890 NERC and NAESB joint standards development effort, it was determined that the standards contained in MOD003 should be business practice standards instead of reliability standards. NERC has requested that NAESB adopt the standards as business practices via correspondence to Ms. McQuade, NAESB President.) This item will require coordination with the NERC Order 890 reliability standards development because the language to address this item is contained within a draft standards that addresses items that are dependent on NERC deliverables, i.e., the requirements to create an "ATC Information Link" on OASIS. There is no Order 890 cite for this item. Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	BPS, ESS/ITS
	c)	Develop version 1 business practice standards to support transparency reporting and related functions that may be required as a result of the final order. Status: Completed The Executive Committee did not approve the recommendation submitted by the EC Task Force. Instead, they approved a "No Action" Recommendation for this annual plan item at their October 6, 2008 meeting	3rd Q 2008	EC Task Force
3	**Develop business practices standards to improve the current operation of the wholesale electricity market and develop and maintain business practice and communication standards for OASIS and Electronic Scheduling**			
	a)	Develop and/or maintain business practice standards as needed for OASIS and electronic scheduling. Specific items to address include:		
		i) Develop OASIS S&CP changes to support OASIS business practices. Status: Completed Dependent on development of OASIS business practices	3rd Q 2008	ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
ii)	Network Services: Determine and develop needed business practice standards or other support is needed to support use of OASIS for Network Service transactions (R04006E). (Related to AP 2(a)(iii)) Status: Underway	1st Q, 2009	ESS/ITS
iii)	Registry (TSIN): Determine and develop needed business practice standards to support the registry functions currently supported by NERC (R04037, R06027). Status: Underway		
	1) Work with the NAESB counsel to develop a confidentiality agreement, (R07013)	2009	BPS
	2) Transition the TSIN Registry from NERC to NAESB.	2009	NAESB Staff
	3) Review and correct the Coordinate interchange Business Practice Standard as noted during the development of the e-Tag 1.8 development process.	3rd Q, 2009	JISWG
v)	Document procedures used to implement the displacement/interruption terms of the Pro Forma tariff (R05019). Status: Not Started	3rd Q, 2009	ESS/ITS
vi)	Make incremental enhancements to OASIS as an outgrowth of the NAESB March 29, 2005 conference on the future of OASIS (R05026). Scoping statement completed by SRS and assignments made to BPS, ESS/ITS and JISWG.		
	1) Represent ALL pre-Order 888 ("grandfathered") transmission and ancillary services in current use in OASIS Status: Completed	3rd Q, 2008	BPS, ESS/ITS
	2) Eliminate Masking of TSR tag source and sink when requested status is denied, withdrawn refused, displaced, invalid, declined, annulled or retracted Status: Not Started	3rd Q, 2009	ESS/ITS
	3) Initiate standard that requires ALL historical transmission service reservations to be available for review up to a number of years in the past. Status: Completed	3rd Q, 2008	ESS/ITS
	4) 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. Status: Not Started	2009	ESS/ITS
	5) 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	2009	ESS/ITS

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		Item Description	Completion[1]	Assignment[2]
	6)	Standardize the availability of TSR study result postings, eliminating practice of some Transmission Owners that charge for viewing these documents. Status: Completed This item was completed with Recommendation (2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3) WEQ-001 Changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting.	1st Q, 2008	ESS/ITS
vii)		Respond to issues in FERC Order No. 676 (Docket No. RM05-5-000) – NAESB WEQ Standards 001 9.7, (paragraph 51 of the order). Status: Underway Item was assigned to group 4, reference 2007 WEQ AP item 2(a)(iv)(3).	2009	EC Task Force
b)		Develop and/or maintain standard communication protocols and cyber-security business practices as needed.		
i)		Address the surety assessment findings on NAESB PKI standards. Status: Completed Item will be provided as a response to the U.S. DoE upon completion by the WGQ for their response to the findings.	1st Q, 2008	JISWG
ii)		Develop PKI standards for OASIS. Status: Not Started	2009	ESS/ITS
iii)		Develop PKI Standards for e-tagging (Develop Implementation Plan). Status: Underway eTagging items are linked to the transition of the Registry from NERC to NAESB.	2nd Q 2009	JISWG
iv)		Develop enhanced Electric Industry Registry (EIR), (R06027) Status: Underway	2009	NAESB Staff
c)		Develop needed business practice standards for organization/company codes for NAESB standards – and address current issues on the use of DUNs numbers. Status: Underway Common code usage is linked to the transition of the Registry from NERC to NAESB.	2009	NAESB Staff with WEQ support
d)		Develop business practice standards in support of FERC Order 717 Status: Not Started	2nd Q, 2009	ESS/ITS
4		**Review and develop business practices standards to support e-Tariff program**		
		Develop business practices as needed to support the e-Tariff program including submittal of tariffs and metadata. (Docket No RM05-1-000) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	1st Q, 2008	Joint WEQ/WGQ e-Tariff Subcommittee

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	Item Description	Completion[1]	Assignment[2]
5	**Review and develop business practices standards to Demand Response, Demand Side Management and Energy Efficiency Programs** Review and develop needed model business practices for a standardized method for quantifying benefits, savings, cost avoidance and/or the reduction in energy demand and usage derived from the implementation of demand side management and energy efficiency programs. This effort will include demand side response, energy efficiency programs and metering, including the 'curtailment service provider' program.		
a)	Develop matrix and business practice standards for measurement and verification for demand response programs in ISO/RTO footprint areas. Status: Completed	4th Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee
b)	Develop matrix and business practice standards for measurement and verification for demand response programs in non-ISO/RTO footprint areas. Status: Underway	TBD	Joint WEQ/Retail DSM-EE Subcommittee
c)	Develop preamble for business practice standards for measurement and verification for demand response and energy efficiency programs. Status: Underway	2009	Joint WEQ/Retail DSM-EE Subcommittee
d)	Develop glossary for business practice standards Status: Underway	2009	Joint WEQ/Retail DSM-EE Subcommittee
e)	Support retail development of matrix and model business practice standards for measurement and verification for demand response programs Status: Underway	2009	Joint WEQ/Retail DSM-EE Subcommittee
f)	Develop business practice standards to measure and verify energy reductions that are made to comply with a Renewable Portfolio Standard that included energy efficiency or a stand-alone Energy Efficiency Portfolio Standard. Status: Not Started	Phase 2	Joint WEQ/Retail DSM-EE Subcommittee
g)	Develop business practice standards to factor Demand Control and Energy Efficiency programs into reliability / supply decisions at the wholesale level for generation and transmission planning and operations. Status: Not Started	Phase 2	Joint WEQ/Retail DSM-EE Subcommittee
h)	Develop business practice standards for cap and trade programs for green house gas Status: Not Started	Phase 2	Joint WEQ/Retail DSM-EE Subcommittee
6	**Maintain existing body of Version 1 standards**		
a)	Review/revise WEQ 006 to remove/revise mandatory requirements for Interconnection Time Monitor (R07019) Status: Completed Published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	2nd Q, 2008	BPS

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	Item Description	Completion[1]	Assignment[2]
b)	Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020) Status: Complete	3rd Q, 2008	BPS
c)	Make consistency changes to Version 1.0 standards as directed by the WEQ Leadership Committee on December 12, 2007 (R08001 – BPS, ESS/ITS, R08002 - ESS/ITS, R08003 - ESS/ITS - BPS, R08004, R08005 - ESS/ITS)		
	1) OASIS Consistency Changes (R08001, R08002, R08003, R08005) Status: Not Started	2009	ESS/ITS
	2) Gas / Electric Communication Consistency Changes (R08004) Status: Underway	2009	BPS
d)	Modify WEQ-001 to reflect in the definition of certain ancillary services that such ancillary services may be provided by non-generation resources such as demand resources. (http://www.naesb.org/pdf3/weq_ec051308w2.doc) Status: Completed To be published in Version 002, September 30, 2008 and forwarded to the FERC as part of the Version 002 filing, August 29, 2008.	July 2008	BPS, ESS/ITS
e)	Modify NAESB definitions to address internal inconsistencies and inconsistencies with the NERC glossary, (http://www.naesb.org/pdf3/weq_ec051308w3.doc) Status: Underway Subcommittee co-chairs are developing WEQ-000 Definition of Terms/Acronyms to replace definitions being included in each NAESB Business Practice.	1st Q, 2009	BPS, SRS, ESS/ITS
f)	Review and evaluate whether to cutoff or put a size limit on the entities for which the standards apply Status: Completed After review of FERC Order 676, the subcommittee determined this annual plan item was outside of NAESB's scope. Waivers for standards based on an entity's size should be addressed by FERC rather than through standards at NAESB.	3rd Q, 2008	SRS
g)	Investigate and review possible modifications to the WGQ Intraday Nominations, Confirmation Scheduling, and Gas Day standards, including possible standards for coordination of wholesale electric and wholesale gas scheduling. (R03031, R03031 revised, Interim Report, Final Report) Status: Completed The subcommittee reviewed the standards request and documentation developed by the Gas Electric Coordination Task Force and determined no additional work was required. The subcommittee approved a "no action" recommendation to close out this standards request.	3rd Q, 2008	SRS
h)	Develop standards to allow for registered Market Operators to request changes to the Market Level profile of Implemented Interchange (R06006) Status: Underway This request may be more of a clean-up in nature as it was requested in May 2006 but has not been addressed or presented as completed with the requisite documentation.	1st Q 2009	JISWG

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	Item Description	Completion[1]	Assignment[2]
i)	Modify the timing chart for the Western Interconnection in WEQBPS-006 to an initiation of manual time error at +/-5 seconds. (R06010) Status: Completed The BPS developed a No Action recommendation for this request since the scope of the request had been addressed through a minor correction in 3rd Quarter 2006.	3rd Q, 2008	BPS
j)	Develop a standard mechanism to implement a "RECALL" of transmission capacity from an existing confirmed transmission service reservation/Specify the technical requirements for implementation of a new OASIS request type, RECALL. (R07001) Status: Completed This request was originally assigned to the ESS/ITS in February 2007.	3rd Q, 2008	ESS/ITS
k)	Clarify the S&CP implementation of the DEFERRAL request. (R07003) Status: Completed This request was originally assigned to the ESS/ITS in February 2007.	3rd Q, 2008	ESS/ITS
l)	Develop business practice and technical standards for assigning, tracking, and limiting rollover rights. (R07004) Status: Completed This Standards Request was assigned to the ESS/ITS in February 2007.	3rd Q, 2008	ESS/ITS
m)	Update the Timing Table to Reflect the Categories (On-time, Late, After-the-fact, and Pre-late) used in the latest E-Tag Specification with respect to receipt of an Arranged Interchange (RFI). (R07007) Status: Completed	4th Q, 2008	JISWG
n)	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. (R08011) Status: Not Started This Standards Request was assigned to the ESS/ITS in May 2008.	2009	ESS/ITS
o)	Provide for Enhanced Granularity for Public Utilities in Identifying Critical Operational Flow Orders. (R08020) Status: Not Started. This Standards Request was assigned to the BPS in August 2008.	2009	BPS jointly with WGQ BPS

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2008 WEQ Annual Plan Approved by the Board of Directors on October 20, 2008

Reviewed by Subcommittee, Working Group, and Task Force Co-Chairs as of November 14, 2008

PROVISIONAL ITEMS

1 Develop and or modify business practices related to support of NERC effort on the NERC Resources and Transmission Adequacy and Inadvertent Interchange Data Standards BAL-006 revisions.

Status: In review of the NERC development effort, Balancing Authority Controls (Project 2007-05), with Mr. Akens (TVA, NERC Drafting Team Leader) and Mr. Rodriquez (NERC Manager, Business Practice Coordination), it was determined that no changes would be required to NAESB standards. As such, NAESB leadership is not at this time determining if any development would be undertaken, which would then initiate a joint development effort. A letter to this effect was sent to NERC management. This assessment may however change as the NERC drafting team proceeds further in its development, so the provisional item remains on the 2008 WEQ Annual Plan.

2 Develop business practice standards as requested by the regional and state advisory groups.

3 Develop business practice standards as related to the Effectiveness Study of Competitive Wholesale Markets (Congressional Mandate), Electric Energy Market Competition Task Force, Docket No. AD05-17-000, issued by the FERC on October 13, 2005.

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 directives related to the conclusions of the NAESB reports submitted in FERC Order No. 698, Docket Nos. RM05-5-001 and RM96-1-027.

5 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).

6 Determine any needed NAESB action in support of the Interchange Distribution Calculator (IDC) and develop any necessary standards.

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	Item Description	Completion[1]	Assignment[2]
1	**Develop business practices standards as needed to complement reliability standards**		
	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)	Develop business practices to support Coordinate Interchange – R05020 "Include a guideline for rounding schedules with partial MWh's in the coordinate interchange business practice WEQ BPS-002-000" the rounding standard recommendation Status: Underway	3rd Q, 2009	JISWG
b)	Continuous support of TLR Procedure in alignment with NERC efforts on TLR Phase II and Phase III development.		
i)	Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection. Note: Activity is dependent on NERC approval of SAR expected in 2nd Q, 2009. Upon approval of the SAR and NAESB action on this item, consideration should be given to provisional item 4. Status: Not Started	4th Q, 2009	BPS
ii)	Update WEQ-008 Appendix D to include the Market Flow Threshold Percentage recommended by NERC working group/task force Status: Not Started (dependent on successful field test - expected Oct. 2009) Upon receipt of recommendation, completion date may be adjusted.	4th Q, 2009	BPS
c)	Conduct analysis as to whether standards can be developed which outline a standardized process for the coordination and execution of emergency energy schedules. These would be complementary standards to EOP-002-2 Requirements R4 and R6 (SRS Analysis of EOP-002-2 R4 & R6) Status: Completed and as a result item (3)(a)(viii) has been added to the plan	1st Q, 2009	JISWG
d)	Time Error and Inadvertent (BAL-004 and BAL-006) Coordination with NERC Status: Not Started (Upon initiation of this item by NAESB. a completion date will be determined. The date of 2011 is based on a completion date provided in the NERC BAC project schedule which includes extensive field testing and diverse proposed TIMTF directions to be reconciled in subcommittee meetings.)	2011	TIMTF
e)	DCS and AGC (BAL-002 and BAL-005) Coordination with NERC Status Not Started (Upon initiation of this item by NAESB. a completion date will be determined. The date of 2011 is based on a completion date provided in the NERC BAC project schedule which includes extensive field testing and diverse proposed TIMTF directions to be reconciled in subcommittee meetings.)	2011	TIMTF

[1] Dates in the completion column are by end of the quarter for completion by the assigned committee. 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.

[2] The assignments are abbreviated. The abbreviations and committee structure can be found at the end of the annual plan document.

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	Item Description	Completion[1]	Assignment[2]
2	**Develop business practice standards in support of the FERC RM05-25-000 and RM05-17-000 (OATT Reform)**		
a)	Develop version 2 business practice standards to better coordinate the use of the transmission system among neighboring transmission providers. Such business practice standards would be based on recommendations from NERC's Long Term ATC/AFC Task Force and would involve revised procedures for the ATC calculation and/or revised protocols as determined by the final order.		
	Status: Underway		
	Development is using joint standards development process with NERC. Request R050004 was expanded to include the Order No. 890 (Docket Nos. RM05-25-000 and RM05-17-000) and Order No. 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002), "Preventing Undue Discrimination and Preference in Transmission Services", issued April 11, 2007).		
i)	Group 3: Network Service On OASIS		
9.	Use of OASIS to Make Electronic Requests to Designate and Terminate Network Resource	3rd Q, 2009	ESS/ITS
	Status: Underway		
10.	Ability to Query Requests to Designate and Terminate Network Resources and Allow for Queries of All Information Provided with Designation Requests	3rd Q, 2009	ESS/ITS
	Status: Underway		
11.	Masking of Designated Network Resource Operating Restrictions and Generating Cost Information	3rd Q, 2009	ESS/ITS
	Status: Underway		
12.	Procedural Requirements for Submitting Designations over new OASIS Functionality	3rd Q, 2009	ESS/ITS
	Status: Underway		
13.	Specify How Designated Network Service Informational Postings are Posted on OASIS	3rd Q, 2009	ESS/ITS
	Status: Underway		
14.	Develop standards for the treatment of OASIS Requests when the Customer Fails to Provide the Necessary Attestation	3rd Q, 2009	ESS/ITS
	Status: Underway		
15.	Procedural Requirements for Submitting Both Temporary and Indefinite Terminations of Network Resources	3rd Q, 2009	ESS/ITS
	Status: Underway		
16.	Procedures for Submitting and Processing Requests for Concomitant Evaluations of Transmission Requests and Temporary Terminations	3rd Q, 2009	ESS/ITS
	Status: Underway		

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Item Description	Completion[1]	Assignment[2]
ii) Group 4: Pre-Emption; Request No. R05019; and Revisions to Standard 9.7		
5. Pre-Emption Status: Not Started	4th Q, 2009	ESS/ITS
6. Request No. R05019 Status: Not Started	4th Q, 2009	ESS/ITS
7. Modify WEQ-001-9.7 Rollover Rights for Redirect on a Firm Basis Status: Underway	2nd Q, 2009	ESS/ITS
iii) Group 5: Paragraph 1377		
3. Paragraph 1377 Status: Not Started	4th Q, 2009	ESS/ITS
4. Re-Bid Of Partial Service across Multiple Transmission Providers' Systems Status: Not Started	4th Q, 2009	ESS/ITS
iv) Group 6: Miscellaneous (Paragraphs 1390 and 1627 of Order 890)		
5. Paragraph 1390 of Order 890 Status: Not Started	4th Q, 2009	ESS/ITS
6. Paragraphs 1627 of Order 890 Status: Not Started	4th Q, 2009	ESS/ITS
7. Redispatch Cost Posting to allow for posting of third party offers of planning redispatch services. Status: Not Started	4th Q, 2009	ESS/ITS
b) Develop the needed business practices as companion to the NERC standards for ATC related efforts		
i) Develop standards to support existing Request No. R05004.		
1. The processing of transmission service requests, which use TTC/ATC/AFC, in coordination with NERC changes to MOD 001 where the allocation of flowgate capability based on historical Network Native Load impacts the evaluation of transmission service requests, requiring the posting of those allocation values in conjunction with queries of service offerings on OASIS Status: Underway	3rd Q, 2009	ESS/ITS
3 Develop business practices standards to improve the current operation of the wholesale electricity market and develop and maintain business practice and communication standards for OASIS and Electronic Scheduling		
a) Develop and/or maintain business practice standards as needed for OASIS and electronic scheduling. Specific items to address include:		
i) Network Services: Determine and develop needed business practice standards or other support is needed to support use of OASIS for Network Service transactions (R04006E). (Related to AP 2(a)(iii)) Status: Underway	3rd Q, 2009	ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
ii)	Registry (TSIN): Determine and develop needed business practice standards to support the registry functions currently supported by NERC (R04037, R06027).		
	1) Work with the NAESB counsel to develop a confidentiality agreement, (R07013) Status: Underway	3rd Q, 2009	JISWG
	2) Transition the TSIN Registry from NERC to NAESB as the enhanced Electric Industry Registry (EIR), (R06027). Status: Underway	4th Q, 2009	NAESB/NERC Administration, JISWG
iii)	Document procedures used to implement the displacement/interruption terms of the Pro Forma tariff (R05019). Status: Not Started	4th Q, 2009	ESS/ITS
iv)	Make remaining incremental enhancements to OASIS as an outgrowth of the NAESB March 29, 2005 conference on the future of OASIS (R05026). Scoping statement completed by SRS and assignments made to BPS and ESS/ITS.		
	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	4th Q, 2009	ESS/ITS
	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. Status: Underway (upon further development of this item by NAESB, a completion date will be determined)	2010	ESS/ITS
	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)	2010	ESS/ITS
v)	Develop, coordinate inoperability testing, and implement e-Tag version 1.8.1 Status: Underway	4th Q, 2009	JISWG
vi)	Transition e-Tag Specification and schema to NAESB Status: Complete Version 1.8.1 will be identified as the NAESB Electronic Tagging Functional Specification	1st Q, 2009	JISWG
vii)	Review and correct the WEQ-004 Coordinate interchange Business Practice Standard as noted during the development of the e-Tag 1.8 development process. Status: Underway	3rd Q, 2009	JISWG

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		Item Description	Completion[1]	Assignment[2]
	viii)	Review and correct WEQ-004 Coordinate Interchange Business Practice Standard as needed based on activities in NERC Project 2008-12, Coordinate Interchange Standards Revisions and supporting EOP-002-2 R4 and R6. [note: this is a new item] Status: Not started – dependent on NERC activity (upon initiation of this item by NAESB, a completion date will be determined)	2010	JISWG
b)		Develop and/or maintain standard communication protocols and cyber-security business practices as needed.		
	i)	Develop PKI certification program for e-Tag and OASIS Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	2009	Board Cert. Prgm Comm
	ii)	Develop PKI standards for OASIS. Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	2009	ESS/ITS
	iii)	Develop Industry Implementation Plan for meeting PKI Standard requirements for e-tagging. Status: Underway eTagging items are linked to the transition of the Registry from NERC to NAESB.	July, 2009	JISWG
c)		Develop needed business practice standards for organization/company codes for NAESB standards – and address current issues on the use of DUNs numbers. Status: Underway (upon further development of this item by NAESB, a completion date will be determined) Common code usage is linked to the transition of the Registry from NERC to NAESB	2009	NAESB Staff with WEQ support
d)		Develop business practice standards in support of FERC Order No. 717 Status: Complete	1st Q, 2009	BPS
4		**Review and develop business practices standards to Demand Response, Demand Side Management and Energy Efficiency Programs[3]** Review and develop needed model business practices for a standardized method for quantifying benefits, savings, cost avoidance and/or the reduction in energy demand and usage derived from the implementation of demand side management and energy efficiency programs. This effort will include demand side response, energy efficiency programs and metering, including the 'curtailment service provider' program.		
a)		Develop matrix and business practice standards for measurement and verification for demand response products and services in ISO/RTO footprint areas. Status: Completed *(see (b) below for completion of examples)*	4th Q, 2008	WEQ Section of the Joint WEQ/REQ DSM Subcommittee

[3] The Board of Directors has approved assigning 4(f), 4(g) and 4(h) to a separate subcommittee, not dependent on the completion of the efforts developing demand response M&V standards. As such these items can proceed independent of the demand response efforts.

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	Item Description	Completion[1]	Assignment[2]
b)	Develop more detailed technical standards for the measurement and verification of demand response products and services in ISO-RTO footprint areas, including examples to be developed to support item 4(a) above. Status: Not Started (Scope to be initiated in 2nd Q, 2009, after which a completion date will be set) – *The first meeting is scheduled for April 16, 2009*	Phase 2	WEQ Section of the Joint WEQ/REQ DSM Subcommittee
c)	Develop preamble for business practice standards for measurement and verification for demand response and energy efficiency programs. Status: Underway	3rd Q, 2009	Joint WEQ/REQ DSM-EE Subcommittee
d)	Develop glossary for business practice standards Status: Underway	3rd Q, 2009	Joint WEQ/REQ DSM-EE Subcommittee
e)	Support retail development of matrix and model business practice standards for measurement and verification for demand response products and services Status: Underway	2nd Q, 2009	REQ Section of Joint WEQ/REQ DSM-EE Subcommittee
f)	Develop business practice standards to measure and verify energy reductions that are made to comply with a Renewable Portfolio Standard that included energy efficiency or a stand-alone Energy Efficiency Portfolio Standard. Status: Not Started (Scope to be initiated in 2nd Q, 2009, after which a completion date will be set)	Phase 2	WEQ Section/Joint WEQ/REQ DSM-EE Subcommittee
g)	Develop business practice standards to factor Demand Control and Energy Efficiency programs into reliability / supply decisions at the wholesale level for generation and transmission planning and operations in ISO/RTO footprint areas. Status: Not Started (Scope to be initiated in 2nd Q, 2009, after which a completion date will be set)	Phase 2	WEQ Section/Joint WEQ/REQ DSM-EE Subcommittee
h)	Develop business practice standards for cap and trade programs for green house gas Status: Not Started (Scope to be initiated in 2nd Q, 2009 at the earliest. Upon conclusion of the scoping statement it will be determined whether NAESB standards development is appropriate)	Phase 2	Joint WEQ/REQ DSM-EE Subcommittee
6	**Maintain existing body of Version 2 standards**		
a)	Make consistency changes to Version 1.0 standards as directed by the WEQ Leadership Committee on December 12, 2007 (R08001 – BPS, ESS/ITS, R08002 - ESS/ITS, R08003 - ESS/ITS - BPS, R08004, R08005 - ESS/ITS)		
1)	OASIS Consistency Changes (R08001, R08002, R08003, R08005) Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	2009	ESS/ITS

NORTH AMERICAN ENERGY STANDARDS BOARD

2009 WEQ Annual Plan Approved by the Board of Directors on March 26, 2009

	Item Description	Completion[1]	Assignment[2]
	2) Gas / Electric Communication Consistency Changes (R08004) Status: Underway	2nd Q, 2009	BPS
b)	Modify NAESB definitions to address internal inconsistencies and inconsistencies with the NERC glossary. Revise existing NAESB glossary/definition of terms to be applicable to entire set of WEQ Business Practices. (http://www.naesb.org/pdf3/weq_ec051308w3.doc) Status: Underway Subcommittee co-chairs are developing WEQ-000 Definition of Terms/Acronyms to replace definitions being included in each NAESB Business Practice.	2nd Q, 2009	BPS/ESS/ITS/SRS Co-chairs
c)	Develop standards to allow for registered Market Operators to request changes to the Market Level profile of Implemented Interchange (R06006) Status: Complete	1st Q, 2009	JISWG
d)	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. (R08011) Status: Not Started This Standards Request was assigned to the ESS/ITS in May 2008.	3rd Q, 2009	ESS/ITS
e)	Provide for Enhanced Granularity for Public Utilities in Identifying Critical Operational Flow Orders. (R08020) Status: Not Started. This Standards Request was assigned to the BPS in August 2008 (upon initiation of this item by NAESB, a completion date will be determined)	2009	BPS jointly with WGQ BPS
f)	Synchronize Bidding Credit Requirements for FTR, TCC and CRR (R08025) Posting of collateral is an important issue for financial marketers. Most financial marketers and smaller entities are required to post cash for FTR transactions, while most utilities post unsecured credit. Therefore, the timing for posting collateral is especially crucial to financial marketers. There are two posting periods for FTRs: 1. The Bidding Requirement: Credit must be posted with FTR bids and these monies are held until bids are cleared. 2. The Holding Requirement: After bids are cleared and FTRs awarded, collateral is required for the amount of time the FTR is active. Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	2009	SRS (Scoping)

PROVISIONAL ITEMS

1 Develop and or modify business practices related to support of NERC effort on the NERC Resources and Transmission Adequacy (Project 2009-05 Resource Adequacy Assessment).

2 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).

3 Determine any needed NAESB action in support of the Interchange Distribution Calculator (IDC) and develop any necessary standards.

4 Prepare recommendations for future path for TLR (equity concerns) in concert with NERC, which may include alternative congestion management procedures4. Work on this activity is dependent on completing 2009 WEQ Annual Plan 1.c.i (Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection).

[4] For additional information, please see comments submitted by PJM and MISO for this Annual Plan Item: http://www.naesb.org/pdf3/weq_aplan102907w1.pdf.

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	Item Description	Completion[1]	Assignment[2]
5	Develop complementary standards that align with NERC Project 2008-01 Voltage and Reactive Control, for which a white paper is expected after the 2009 SAR is processed.		
6	Develop NAESB business practices as needed to complement NERC reliability standards for FAC-012 and FAC-013.		
7	Determine NAESB action needed to support FERC Action Plan for Smart Grid Technology.		

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.

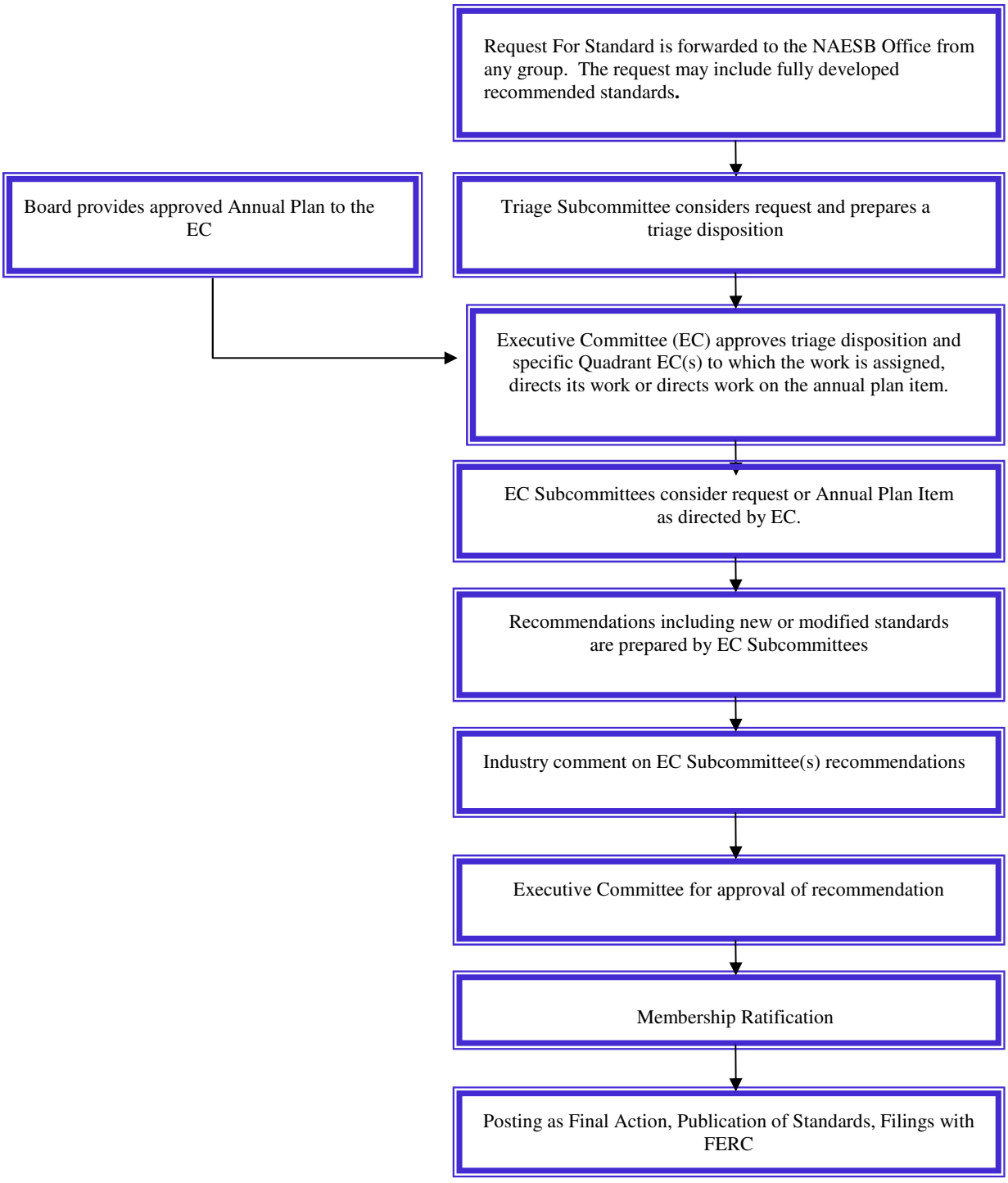
When the recommendation is complete, it is made available for a thirty-day industry comment period. The recommendation and comments are then forwarded to the EC, which considers the recommendation, makes any changes it deems necessary, and takes a vote. A recommendation must receive an affirmative vote 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.

The foregoing 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. The standards that apply to electronic delivery mechanisms have been endorsed by several state regulatory bodies and have also been adopted by the automotive, insurance, and health care industries.

The certificate, bylaws and NAESB Operating Procedures can be accessed from the NAESB web site (http://www.naesb.org/pdf/naesbcert050503.pdf – certificate, http://www.naesb.org/pdf/naesbbylaws.pdf – bylaws, http://www.naesb.org/pdf/operating_procedures.pdf - operating procedures), and provide much more detail on the standards development procedures followed by NAESB.

North American Energy Standards Board
Standards Development Process Flow Chart



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. This process is currently being implemented by the NAESB WEQ BPS and ESS/ITS with the NERC ATC Standards Drafting Team to develop reliability standards and business practice standards to address Commission Order No. 890.

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. Documentation is being prepared to formally dissolve the JIC, which has not met since June 15, 2006. The record of the meetings can be found on the NAESB web site at the following link: http://www.naesb.org/weq/weq_nercmou.asp.

[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": http://www.naesb.org/doc_view2.asp?doc=ferc021706.pdf.

126 FERC ¶ 61,253
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

18 CFR Part Chapter I

[Docket No. PL09-4-000]

SMART GRID POLICY

(Issued March 19, 2009)

AGENCY: Federal Energy Regulatory Commission.

ACTION: Proposed Policy Statement and Action Plan.

SUMMARY: This proposed policy statement and action plan provides guidance to inform the development of a smarter grid for the Nation's electric transmission system focusing on the development of key standards to achieve interoperability of smart grid devices and systems. The Commission also proposes a rate policy for the interim period until interoperability standards are adopted. Smart grid investments that demonstrate system security and compliance with Commission-approved Reliability Standards, the ability to be upgraded, and other specified criteria will be eligible for timely rate recovery and other rate treatments. This rate policy will encourage development of smart grid systems.

DATES: Comments on the proposed policy statement and action plan are due [Insert_Date 45 days after publication in the **FEDERAL REGISTER**]

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SUPPLEMENTARY INFORMATION:

126 FERC ¶ 61,253
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Acting Chairman;
Suedeen G. Kelly, Marc Spitzer,
and Philip D. Moeller.

Smart Grid Policy Docket No. PL09-4-000

PROPOSED POLICY STATEMENT AND ACTION PLAN

(Issued March 19, 2009)

1. The Commission is issuing this proposed policy statement to articulate its policies and near-term priorities to help achieve the modernization of the Nation's electric transmission system, one aspect of which is "Smart Grid" development. Smart Grid advancements will apply digital technologies to the grid, and enable real-time coordination of information from generation supply resources, demand resources,[1] and distributed energy resources (DER).[2] This will bring new efficiencies to the electric system through improved communication and coordination between utilities and with the grid, which will translate into savings in the provision of electric service. Ultimately the

[1] For purposes of this proposed policy statement, "demand resources" refers to the set of demand response resources and energy efficiency resources and programs that can be used to reduce demand or reduce electricity demand growth.

[2] DER comprises dispersed generation devices and dispersed storage devices, including reciprocating engines, fuel cells, microturbines, photovoltaics, combined heat and power, and energy storage. See International Electrotechnical Commission, International Standards IEC 61850-7-420.

smart grid will facilitate consumer transactions and allow consumers to better manage their electric energy costs. These technologies will also enhance the ability to ensure the reliability of the bulk-power system. The Commission's interest and responsibilities in this area derive from its authority over the rates, terms and conditions of transmission and wholesale sales in interstate commerce, its responsibility for approving and enforcing mandatory reliability standards for the bulk-power system in the United States, and a recently enacted law[3] requiring the Commission to adopt interoperability standards and protocols necessary to ensure smart-grid functionality and interoperability in the interstate transmission of electric power and in regional and wholesale electricity markets. The development and implementation of these interoperability standards is a challenging task, which requires the efforts of industry, the states and other federal agencies, in addition to the Commission. The Commission intends to use its authority, in coordination and cooperation with other governmental entities, to help achieve interoperability in a timely manner. Achievement of interoperability will not only increase the efficiency of the bulk-power system, with the goal of achieving long-term consumer savings, but will also enable demand response and other consumer transactions and activities that give consumers the tools to better control their electric energy costs. Reaching this goal will also help promote the integration of significant new renewable

[3] Energy Independence and Security Act of 2007, Pub. L. No. 110-140, 121 Stat. 1492 (2007) (EISA).

power into the transmission system and help state and federal initiatives to promote greater reliance on renewable power and meet future demand growth to satisfy the Nation's energy needs.

2. The purpose of the policy statement the Commission ultimately adopts will be to prioritize the development of key interoperability standards, provide guidance to the electric industry regarding the need for full cybersecurity for Smart Grid projects, and provide an interim rate policy under which jurisdictional public utilities may seek to recover the costs of Smart Grid deployments before relevant standards are adopted through a Commission rulemaking. Specifically, development of interoperability standards for inter-system communication, system security, wide-area situational awareness, demand response, electric storage, and electric transportation should be prioritized and accelerated. The work done on certain standards will provide a foundation for development of many other standards.

3. In addition, as further explained below, for the near term we propose certain rate treatments to encourage investment in Smart Grid technologies that advance efficiency, security, reliability and interoperability in order to address potential challenges to the bulk-power system. We recognize that a key consideration of public utilities in deciding whether to invest in Smart Grid technologies may involve the potential for stranded costs associated with legacy systems that are replaced by Smart Grid equipment. Additionally, as the electric system may require several of the new capabilities of the Smart Grid

before interoperability standards have been developed, we recognize the need for guidance for jurisdictional entities. Thus, to offer some rate certainty and guidance regarding cost recovery issues, the Commission is proposing a rate policy for the interim period until final interoperability standards are adopted. The Commission also proposes that smart grid investments that demonstrate system security and compliance with Commission-approved Reliability Standards, the ability to be upgraded, and other specified criteria will be eligible for timely rate recovery and other rate treatments. For now, we propose as an interim rate policy to accept single-issue rate filings submitted under FPA section 205 by public utilities to recover the costs of Smart Grid deployments involving jurisdictional facilities provided that certain showings are made. In other words, we propose to consider Smart Grid devices and equipment, including those used in a Smart Grid pilot program or demonstration project, to be used and useful for purposes of cost recovery if an applicant makes the certain showings, as described below.

4. We seek comments from the industry on these and other steps the Commission can take to encourage and expedite the development of interoperability standards and implementation of Smart Grid projects. In the near future, we may convene a technical conference for further public input on these issues.

I. Background

5. Under the Federal Power Act (FPA), the Commission has jurisdiction over the transmission of electric energy in interstate commerce by public utilities, and over the

reliable operation of the bulk-power system in most of the Nation.[4] The Commission also was given a new responsibility under the EISA, discussed further below, to issue a rulemaking to adopt standards and protocols to ensure Smart Grid functionality and interoperability in interstate transmission of electric power and in regional and wholesale electric markets.

6. Section 1301 of the EISA states that it is the policy of the United States to support the modernization of the Nation's electricity transmission and distribution system to maintain a reliable and secure electricity infrastructure that can meet future demand growth and to achieve each of several goals and characteristics, which together characterize a Smart Grid.[5] These goals and characteristics are:

> (1) Increased use of digital information and controls technology to improve reliability, security, and efficiency of the electric grid. (2) Dynamic optimization of grid operations and resources, with full cyber-security. (3) Deployment and integration of distributed resources and generation, including renewable resources. (4) Development and incorporation of demand response, demand-side resources, and energy efficiency resources. (5) Deployment of "smart" technologies (real-time, automated, interactive technologies that optimize the physical operation of appliances and consumer devices) for metering, communications concerning grid operations and status, and distribution automation. (6) Integration of "smart" appliances and consumer devices. (7) Deployment and integration of advanced electricity storage and peak-shaving

[4] 16 U.S.C. 824, 824o.

[5] EISA sec. 1301, to be codified at 15 U.S.C. 17381.

> technologies, including plug-in electric and hybrid electric vehicles, and thermal storage air conditioning. (8) Provision to consumers of timely information and control options. (9) Development of standards for communication and interoperability of appliances and equipment connected to the electric grid, including the infrastructure serving the grid. (10) Identification and lowering of unreasonable or unnecessary barriers to adoption of smart grid technologies, practices, and services.[6]

7. Section 1305(a) of EISA directs the National Institute of Standards and Technology (the Institute) ". . . to coordinate the development of a framework that includes protocols and model standards for information management to achieve interoperability of smart grid devices and systems."[7] A helpful description of interoperability is "the ability of a system or a product to work with other systems or products without special effort on the part of the customer . . ."[8] In order to achieve the

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[6] Id.

[7] EISA sec. 1305(a), to be codified at 15 U.S.C. 17385(a).

[8] Testimony of Patrick D. Gallagher, Ph.D., Deputy Director, National Institute of Standards and Technology, before the Committee on Energy and Natural Resources, United States Senate, March 3, 2009, available at: http://www.nist.gov/director/ocla/nist%20pgallagher%20smart%20grid%20testimony%20senate%20e&nr%203-3-09.pdf. According to the GridWise Architecture Council, the term "interoperability" refers to the ability to: (1) exchange meaningful, actionable information between two or more systems across organizational boundaries; (2) assure a shared meaning of the exchanged information; (3) achieve an agreed expectation for the response to the information exchange; and (4) maintain the requisite quality of service in information exchange (i.e., reliability, accuracy, security). See GridWise Architecture Council, Interoperability Path Forward Whitepaper at 1-2, 2005, available at: http://www.gridwiseac.org/pdfs/interoperability_path_whitepaper_v1_0.pdf. The GridWise Architecture Council was formed by the U.S. Department of Energy to

(continued…)

Smart Grid characteristics and functions listed in EISA section 1301, interoperability of Smart Grid equipment will be essential.

8. Finally, pursuant to the EISA, once the Commission is satisfied that the Institute's work has led to "sufficient consensus" on interoperability standards, we are directed to "institute a rulemaking proceeding to adopt such standards and protocols as may be necessary to insure smart-grid functionality and interoperability in interstate transmission of electric power, and regional and wholesale electricity markets."[9]

9. The Commission appreciates the Institute's work to assess current Smart Grid standards and infrastructure to identify gaps, and is aware of its plans to create a knowledge base to enable effective communication among stakeholders and a roadmap to lay out a recommended course toward a highly interoperable grid.[10] In general, we expect that the Institute will recommend standards to the Commission that have resulted from the Institute's coordination with standards development organizations and technical experts. The Commission will initiate rulemakings as individual or suites of standards[11] achieve sufficient consensus. The Commission will consider the most effective and

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promote and enable interoperability among the many entities that interact with the Nation's electric power system. See http://www.gridwiseac.org/about/mission.aspx.

[9] EISA sec. 1305(d), to be codified at 15 U.S.C. 17385(d).

[10] See Testimony of Patrick D. Gallagher, Ph.D., infra n.8.

[11] A suite of standards would consist of a group of related standards.

efficient ways to interact with the Institute and standards development organizations between the issuance of a notice of proposed rulemaking on submitted standards and a final rule adopting standards. We invite comment on this proposed approach.

10. The Commission will continue to take an active role in helping to ensure that the participants in the Institute's process effectively prioritize and sequence future standards development efforts. We invite comments on what factors the Commission should consider in determining when the Institute's work has led to "sufficient consensus" on interoperability standards to warrant instituting a rulemaking proceeding. We also seek comment and ideas on how to identify and stage the adoption of successive waves of interoperability standards. Finally, we seek comment as to whether there should be some formal process for parties to seek Commission guidance if negotiations on certain interoperability standards reach an impasse.

II. Discussion

A. Urgency of Achieving Certain Smart Grid Functionalities

11. As noted above, rather than directing the Institute to develop interoperability standards of its own, Congress charged the Institute with coordinating such development. The EISA specifically requires the Institute to solicit input from, among others, a range of

existing standards development organizations that rely on extensive negotiation in order to achieve broad industry consensus on proposed standards.[12]

12. The EISA contains no specific deadline for the creation of interoperability standards; instead, it provides for a consensus-based process. However, there is a sense of urgency within industry and government for the development of standards for and deployment of smart grid technologies generally. The Commission is particularly interested in the development of Smart Grid functions and characteristics that can help address challenges to the Commission-jurisdictional bulk-power system. These include the cross cutting issues of cybersecurity and the further development of common information models to allow useful exchange of electric system information (e.g., standard definitions). Broad policy goals also need to be addressed such as optimizing the transmission system to reduce congestion and improve reliability, security and efficiency; encouraging increased reliance on demand response; state and possibly national climate change initiatives such as Renewable Portfolio Standards and other efforts that result in increased reliance on variable renewable resources; and the potential

[12] The EISA specifically names the IEEE (formerly known as the Institute of Electrical and Electronics Engineers), and the National Electrical Manufacturers Association. Other relevant existing standards development organizations could include the International Electrotechnical Commission (IEC), the American National Standards Institute (ANSI), the German Standards Institute (actually Deutsches Institut für Normung), the International Organization for Standardization, and the International Telecommunication Union.

for increased and variable electricity loads from the transportation sector. We discuss in turn the importance of each of these in driving the need for Smart Grid capabilities and the standards to achieve interoperability of smart grid devices with the electric grid and its associated users and infrastructure.

Cybersecurity and reliability

13. Absent any consideration of the Smart Grid concept, other activities and events currently taking place in various regions raise physical and cybersecurity concerns for the electric industry. For example, utilities have already taken advantage of the existing communications infrastructure and capabilities of the Internet to aid their marketing operations. While typically not connecting their more sensitive control center systems directly to the Internet, many entities have nevertheless upgraded those systems to use Internet-based protocols and technologies. This, coupled with the fact that the non-Internet-connected control center operations may be connected to the same corporate network as the Internet-connected marketing systems, means that there may be an indirect Internet vulnerability to those sensitive control systems. Accordingly, without adequate protections, these preexisting utility efforts potentially increase the exposure of the bulk-power system to cybersecurity threats. Cybersecurity and physical security have been ongoing concerns for the Commission and the electric industry with the advent of the mandatory and enforceable federal bulk-power system reliability regime in place in most of the United States under the oversight of the Commission pursuant to FPA section

215.[13] Pursuant to this section 215 authority, the Commission recently approved eight cyber and physical protection related reliability standards.[14]

14. The fact that a smarter grid would permit two-way communication between the electric system and a much larger number of devices located outside of controlled utility environments commands that even more attention be given to the development of cybersecurity standards. Therefore, the Commission proposes to advise the Institute to undertake the necessary steps to assure that each standard and protocol that is developed as part of the Institute's interoperability framework is consistent with the overarching cybersecurity and reliability mandates of the EISA as well as existing reliability standards approved by the Commission pursuant to section 215 of the FPA. The Commission proposes to make consistency with cybersecurity and reliability standards a precondition to its adoption of Smart Grid standards. We seek comment on these proposals.

15. In order to fully incorporate measures to protect against cyber and physical security threats, we also propose to advise the Institute to take the necessary steps to assure that its process for the development of any interoperability standards and protocols

[13] 16 U.S.C. 824o.

[14] See Mandatory Reliability Standards for Critical Infrastructure Protection, Order No. 706, 73 FR 7368 (Feb. 7, 2008), 122 FERC ¶ 61,040, reh'g denied and clarification granted, Order No. 706-A, 123 FERC ¶ 61,174 (2008). Notably, section 215(a) of the FPA, 16 U.S.C. 824o(a), defines the terms "reliability standard," "reliable operation," and "cybersecurity incident."

leaves no gaps in cyber or physical security unfilled. We are concerned that this could be a particular problem where separate groups of interested industry members independently develop and advocate select standards or protocols for the Institute's consideration. We seek comment on this proposal.

Inter-system communication and coordination

16. There is an urgent need to further develop a common semantic framework (i.e., agreement as to meaning) and software models for enabling effective communication and coordination across inter-system interfaces. Such standards could play an important role in the movement to a smarter grid that is capable of addressing challenges to the operation of the bulk-power system. The bulk-power system can be thought of as a system of systems.[15] In order to enable a smarter grid, particularly one capable of addressing the bulk-power system challenges discussed below, effective interfaces must be developed between and among all of these systems (i.e., inter-system interfaces) and common information model standards appear to be powerful tools to enable such inter-system interfaces. The Commission proposes to identify standards for common information models for inter-system interfaces as a high priority for accelerated development. We seek comment on this proposal.

Integrating renewable resources into the electric grid

[15] See Appendix A for a graphic representation of the various systems.

17. Several groups of states have been working on aggressive regional carbon control measures,[16] and one regional effort has already begun operation in the form of the Regional Greenhouse Gas Initiative.[17] Federal legislation addressing carbon control and other environmental and climate related matters may follow. These initiatives point toward a shift in the mix of fuels that will be used to generate electricity, and an associated shift in where new generation resources are located. Additional transmission capacity to ensure deliverability of those new generating resources will be needed in the form of new transmission lines and more efficient use of existing infrastructure. Also, additional demand resources, generation resources, and DER will be needed to reliably integrate variable generation into the electric grid. Efforts to address these challenges could benefit from the enhanced capabilities associated with certain aspects of the Smart Grid; among them, the ability to maximize the capability and use of existing and new transmission capacity,[18] and foster the deployment and integration of demand resources, generation resources and DER.

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[16] See, e.g., the Western Climate Initiative (http://www.westernclimateinitiative.org/) and the Midwestern Greenhouse Gas Reduction Accord (http://www.midwesternaccord.org/).

[17] See http://www.rggi.org/home.

[18] For example, a smarter grid could enable an increase in transmission capacity through a switch from static to dynamic transmission line ratings enabled by the advanced sensor, communications, and information technology capabilities associated with a smarter grid.

18. As of December 2008, the Nation had 25,170 MW of wind generation based on nameplate capacity.[19] According to the 2008 Long-Term Reliability Assessment by the North American Electric Reliability Corporation (NERC), an additional 145,000 MW of wind power projects are planned or proposed over the next ten years.[20] Accordingly, it is evident that in a relatively short period of time, some parts of the bulk-power system may face the need to effectively integrate unprecedented amounts of variable generation resources. This is significant because operators of variable generation have less control over when the resource is available to produce electricity, in contrast with more conventional fossil and nuclear generation.

19. Large amounts of variable generation raise several important operational and planning issues, including: (1) resource adequacy (potential loss and unavailability of variable resources at peak periods and other critical times such as loss of other generators or transmission lines); (2) resource management (potential for over-generation by variable resources during off-peak periods when there is insufficient load to accommodate such generation); and (3) reduced system inertia (potential loss of system

[19] Source, American Wind Energy Association's website: http://www.awea.org/projects/.

[20] North American Electric Reliability Corporation, 2008 Long-Term Reliability Assessment at 12.

stability due to the high penetration of variable resources with low inertia properties). [21] Given sufficient time and resources, a variety of solutions to these concerns may be feasible. For example, investment in large amounts of electricity storage could ultimately address both the resource adequacy and resource management concerns,[22] although technical and economic issues remain to be addressed before such investment is likely to become significant. In the meantime, Smart Grid-enabled demand response capabilities[23]

[21] Inertia is the physical property which allows an object in motion to continue to stay in motion, absent other forces. Traditional dispatchable generating units (such as thermal and hydro power plants) utilize large rotary generators which have large amounts of inertia. This property has a tendency to stabilize the bulk-power system with an output response in the event of a disturbance. Variable resources, such as wind and solar, have less or no inertia and, as such, cut back more quickly in response to disturbances (e.g., frequency excursions), which may contribute to power system instabilities.

[22] The Electricity Advisory Committee, which was formed by the Department of Energy to provide it with advice on a number of electricity issues, recently issued a report, Bottling Electricity: Storage as a Strategic Tool for Managing Variability and Capacity Concerns in the Modern Grid, December 2008. This report asserts that there are many benefits to deploying energy storage technologies into the Nation's grid: (1) a means to improve grid optimization for bulk power production; (2) a way to facilitate power system balancing in systems that have variable renewable energy sources; (3) facilitation of integration of plug-in hybrid electric vehicle power demands with the grid; (4) a way to defer investments in transmission and distribution infrastructure to meet peak loads (especially during outage conditions) for a time; and (5) a resource providing ancillary services directly to grid/market operators.

[23] The Smart Grid concept envisions a power system architecture that permits two-way communication between the grid and essentially all devices that connect to it, ultimately all the way down to large consumer appliances. Efforts at realizing this concept focus on standardization to enable all of this new equipment to be manufactured economically in support of widespread adoption by consumers. Once that is achieved, a significant proportion of electric load could become an important resource to the electric

(continued…)

could add important new tools to deal with both resource adequacy and resource management concerns.[24] Demand response reductions in load can help address the resource adequacy concerns surrounding unexpected loss of variable generation, and EISA envisions, among other things, the development of large new pools of demand response resources.[25]

20. With respect to the resource management concerns surrounding potential over-generation, this situation tends to arise during off-peak periods when load is at its lowest and system operators have already turned off all traditional generation except their large conventional units that, for primarily operational reasons, must be operated in a nearly steady state around the clock.[26] If large amounts of variable generation begin producing

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system, able to respond automatically to customer-selected price or dispatch signals delivered over the Smart Grid infrastructure without significant degradation of service quality. For purposes of this proposed policy statement we will refer to such new demand response capability as Smart Grid-enabled demand response capability.

[24] A recent NERC Draft Special Report recognizes that "[d]emand response has already been shown in some balancing areas to be a flexible tool for operators to use with wind generation [footnote omitted] and is a potential source of flexibility equal to supply-side options." NERC, Special Report Accommodating High Levels of Variable Generation at 45; available at http://www.nerc.com/docs/pc/ivgtf/IVGTF_Reporta_17Nov08.pdf.

[25] See, e.g., EISA sec. 1301(4), (5), (6), (8), and (9), to be codified at 15 U.S.C. 17381(4), (5), (6), (8), and (9).

[26] There can also be an economic justification for around-the-clock operation because large conventional units tend to have relatively higher capital costs and lower running costs. However, their generally slow and difficult start-up and cool-down sequences are the main reason why they cannot be started and stopped easily to address

(continued…)

power during such periods, then the supply of electricity would exceed the demand for electricity and risk unbalancing the bulk-power system. In order to bring the system back into balance in a situation where easily dispatchable generation or demand resources are not available, system operators may have to require variable generation to reduce output. However, at such times this variable generation may be producing the lowest priced energy on the system, so reducing or eliminating its output would not be economically efficient. If a system existed whereby entities[27] could receive a timely signal to temporarily shift their demand from peak to off-peak, and if such load shifts could be controlled by the system operator, then such "dispatchable" demand response could alleviate to some degree the resource management concerns associated with over-generation from the other side of the supply/demand equation. Again, the urgency to develop and implement those aspects of a smarter grid that can enable such demand response capability is clear.[28]

21. The future potential for a large and variable new class of electric load, specifically electricity-powered vehicles, also presents challenges that may deserve special attention and priority in the consensus-based interoperability process being coordinated by the

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over-generation situations.

[27] Such entities would need to have invested in the equipment necessary to reliably measure and control either their own load or the load of clients that they manage under contract.

[28] See, e.g., EISA sec. 1301(4), (5), (6), (8), and (9).

Institute. In addition to the plans of major automobile manufacturers to roll out plug-in hybrid vehicles starting in 2010, it is possible that large numbers of pure electric vehicles, sometimes known as neighborhood electric vehicles, could be purchased as second cars for short-haul daily commuting or for other purposes.[29] Judging by the observed intensity of electric utility and state government interest in this area,[30] the potential for a significant shift in personal transportation technology to electric power in the near future cannot be discounted.

22. The timing of vehicle charging activities is an illustration of the effect electric vehicles can have on the operation of the electric grid. If charging takes place during peak periods it could require a large investment in new generation, demand response resources and/or transmission capacity to meet the resulting higher peak loads. However, charging off-peak could actually improve the operation of the electric system, for example by improving existing generation asset utilization or by providing an electricity storage solution to address the potential for over-generation by variable resources in off-

[29] See, e.g., Kris Osborn, Services Plan to Buy Electric Cars, Federal Times, November 17, 2008, at 3 (noting that Army, Navy, and Air Force plan to purchase a total of 30,000 neighborhood electric vehicles for use on military bases).

[30] See, e.g., John S. Adams, Bill benefits 'medium-speed' electric cars, Great Falls Tribune, January 9, 2009 (reporting on efforts in the Montana legislature to ease restrictions and ownership and use requirements on “medium speed” electric vehicles, which could include electric vehicles of up to 5,000 pounds gross vehicle weight), available at http://www.greatfallstribune.com/article/20090109/NEWS01/901090337.

peak periods. Ultimately, large numbers of plug-in electric vehicles have the potential to provide some ancillary services like distributed energy storage or, when aggregated, regulation service. In all cases, however, the enhanced information processing and high-speed communications and control capabilities of the Smart Grid would be extremely helpful, perhaps necessary, in dealing with the challenges and opportunities associated with large numbers of new electric vehicles on the bulk-power system.

23. Additionally, these and other changing patterns of electricity generation and use are increasing the frequency with which congestion on transmission facilities becomes binding and raises costs for consumers. The Smart Grid concept includes the deployment of advanced sensors and controls throughout the electric system that should maximize the capability and use of existing and new transmission capacity.

24. For all of the reasons discussed above, which may represent direct challenges to the reliable operation of the bulk-power system and wholesale power markets, the fact that many utilities are already beginning to deploy Smart Grid related systems, and the substantial funding for Smart Grid in the American Recovery and Reinvestment Act,[31]

[31] See American Recovery and Reinvestment Act, Pub. L. No. 111-5, Title IV, Subpart A, __ Stat. ___, ___ (2009) (ARRA).

the Commission herein proposes a targeted acceleration of certain aspects of the interoperability standards process as described further below.[32]

B. Development of Key Interoperability Standards

25. As discussed above, several important trends indicate a strong national interest in expediting the development and deployment of the types of technologies and capabilities associated with a smarter grid. To achieve these types of capabilities, Smart Grid technologies must be interoperable.[33] The Commission understands that a consensus-based interoperability standards development process typically requires time to reach consensus, but also recognizes that recent efforts by the Institute and several industry groups, including the OpenSG Subcommittee of the Utility Communication Architecture International User Group (OpenSG Subcommittee) and the GridWise Architecture Council, have developed concepts to prioritize the large set of potential standards, and have suggested principles for expediting development of a set of transmission and distribution systems standards that will facilitate many other important standards development activities. The Commission is committed to identifying these key transmission and distribution standards and working with the Institute to expedite their

[32] This is consistent with the Institute's approach of prioritizing standards and functionalities that may impact reliability. See NIST Smart Grid Issues Summary, March 10, 2009, available at: http://www.nist.gov/smartgrid/ (in case link is temporarily unavailable at this website, please request it via e-mail at: smartgrid@nist.gov).

[33] See Gridwise Architecture Council, Interoperability Path Forward Whitepaper, infra n.8.

adoption. The Commission believes that focusing on the priorities identified below will help to remove uncertainty for developers of standards applicable to all levels of the grid.

26. The Institute has issued for comment a "Smart Grid Issues Summary" that will act as an interim roadmap, starting with high priority standards that are largely based on existing broadly accepted standards.[34] Leveraging existing standards to the greatest extent practical should shorten the time required to finalize needed interoperability standards.

27. The Commission proposes to prioritize the development of standards for two cross-cutting issues and four key grid functionalities involving interfaces between utilities (e.g., regional transmission organizations (RTO) to utilities outside the RTO), utilities and customers, and utilities and other systems (e.g., energy management systems). These cross-cutting issues and key functionalities are proposed as the first level of work to be accomplished in the interoperability standards-setting process. Swift progress on adopting standards for these cross-cutting issues and key functionalities is necessary for the transmission operator/RTO to address the bulk-power system challenges identified above.

28. The two cross cutting issues are first, cybersecurity (and physical security to protect equipment that can give access to Smart Grid operations) and second, a common

[34] See infra n.32.

semantic framework and software models for enabling effective communication and coordination at the boundaries of utility systems where these interface with customer and other systems (and hence provide "inter-system" functionality).[35] The four key grid functionalities are wide-area situational awareness, demand response, electric storage, and electric transportation.

System Security

29. We propose two initial overarching principles regarding security that Smart Grid applications must address in order to comply with the need for full cybersecurity and with the Commission's bulk-power system concerns, consistent with our authority under section 215 of the FPA.[36] First, we believe that a responsible entity subject to Commission-approved reliability standards, such as the Critical Infrastructure Protection Reliability Standards, must ensure that it maintains compliance with those standards during and after the installation of Smart Grid technologies. Indeed, many Smart Grid installations will need to be included on a responsible entity's list of critical assets to be

[35]The concept of the Smart Grid as a "system of systems" and the importance of the need of first focusing on the inter-system interfaces are presented in a paper by the OpenSG Subcommittee and Smart Grid Executive Working Group entitled Smart Grid Standards Adoption: Utility Industry Perspective (Utility Perspective Paper), available at: http://osgug.ucaiug.org/Shared%20Documents/Forms/AllItems.aspx. A graphic that illustrates these concepts is found in Appendix A.

[36] 16 U.S.C 824o.

protected under the Commission-approved NERC Critical Infrastructure Protection Reliability Standards.

30. Second, to the extent that they could affect the reliability of the bulk-power system, Smart Grid technologies must address, the following considerations: (1) the integrity of data communicated (whether the data is correct); (2) the authentication of the communications (whether the communication is between the intended Smart Grid device and an authorized device or person); (3) the prevention of unauthorized modifications to Smart Grid devices and the logging of all modifications made; (4) the physical protection of Smart Grid devices; and (5) the potential impact of unauthorized use of these Smart Grid devices on the bulk-power system.

31. To the extent that any of the new Smart Grid standards or extensions to relevant existing standards require adaptation or extension in order to address these security-related concerns, such considerations should be given the highest priority. The Institute has suggested that beyond the NERC Critical Infrastructure Protection Reliability Standards, additional security standards to be investigated include ISA99/IEC 62443, NIST Special Publication (SP) 800-53, and the work of AMI-SEC.[37] The Institute also

[37] ISA99/IEC 62443 represents a suite of standards for industrial automation and control system security. NIST Special Publication (SP) 800-53 involves security controls for federal agencies, including those who are part of the bulk-power system (e.g., Tennessee Valley Authority, Bonneville Power Authority). The Advanced Metering Infrastructure (AMI) Security Task Force (AMI-SEC), is defining common requirements and standardized specifications for securing AMI system elements.

suggests examining harmonization of several of these standards in order to provide additional protection to the bulk-power system. Commission staff will monitor Institute activities with respect to Smart Grid cybersecurity and physical security in order to fully coordinate the Commission's regulatory objectives and responsibilities in this arena. The Commission seeks comments on this proposed approach to maintaining bulk-power system reliability and security as smart grid technologies are deployed and integrated.

Communication

32. The second cross-cutting issue is the need for a common semantic framework (i.e., agreement as to meaning) and software models for enabling effective communication and coordination across inter-system interfaces. An interface is a point where two systems need to exchange data with each other; effective communication and coordination occurs when each of the systems understands and can respond to the data provided by the other system, even if the internal workings of each system are quite different. A core group of standards initiated by the Electric Power Research Institute provide the basis for addressing this issue - these standards are IEC 61970 and IEC 61968 (together often referred to as the "Common Information Model" standards) and IEC 61850. These standards have been cited by both the Utility Perspective Paper, as well as the Institute's recent Smart Grid Issues Summary.[38] This group of standards was designed to allow

[38] See infra n.32.

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different systems to talk to one another as well as to provide software development tools for more efficient system integration. This suite of standards is already in use by a number of utilities for enterprise system integration (enabling integration across "intra-system" interfaces). Indeed, while additional work on these standards will also help intra-system communication and coordination, we agree with the OpenSG Subcommittee and the Institute that inter-system interfaces should be a priority.

33. The Commission is not mandating that these particular standards be further developed. Rather, we identify them here to establish priorities for further development by the Institute and industry. The group of standards initiated by the Electric Power Research Institute serves as a foundation for developing a complete set of communications standards. These standards require some level of harmonization with one another and other standards, and extensions to these standards will be required for additional interoperability and functionality. Efforts to coordinate and/or harmonize these standards with others intended to promote interoperability should be encouraged. For example, ongoing efforts to coordinate IEC 61968 with "MultiSpeak" developed by the National Rural Electrical Cooperative Association should be continued. But these standards represent the best work to date and will be an essential building block in realizing the most significant early benefits for the bulk-power system. These standards are also key to the attainment of renewable power and climate policy goals and can help

enable customers to manage their energy usage and cost. The Commission seeks comments on this proposed approach.

Four Priority Functionalities

34. In addition to the cross-cutting issues discussed above, the Commission seeks comments on the four Smart Grid functionalities that the Commission's preliminary analysis indicates will be most helpful in addressing the bulk-power system challenges and should be given priority in the standards development process.

Wide-area situational awareness

35. Wide-area situational awareness is the visual display of interconnection-wide system conditions in near real time at the reliability coordinator level and above. The wide-area situational awareness efforts, with appropriate cybersecurity protections, can rely on the NASPInet work undertaken by the North American SynchroPhasor Initiative (NASPI) and will require substantial communications and coordination across the RTO and utility interfaces. We encourage the RTOs to take a leadership role in coordinating the NASPI work with the member transmission operators.

36. Regarding the potential Smart Grid role in addressing transmission congestion and optimization of the system, increased deployment of advanced sensors like Phasor Measurement Units will give bulk-power system operators access to large volumes of high-quality information about the actual state of the electric system that should enable a more efficient use of the electric grid, for example through a switch from static to

dynamic line ratings. However, such large volumes of data present challenges in the form of information processing and management. Advanced software and systems will be needed to manage, process, and render this data into a form suitable for human operators and automated control systems. The Institute's process should strive to identify the core requirements for such software and systems that would be most useful to system operators in addressing transmission congestion and reliability.

Demand response

37. Smart Grid-enabled demand response is a priority because of its potential to help address several of the bulk-power system challenges identified above. Further development of key standards would enhance interoperability and communications between system operators, demand response resources, and the systems that support them. In order to achieve an appropriate level of standardizations, a series of demand response "use cases" should be developed using readily available tools.[39] In this regard, we encourage a particular focus on use cases for the key demand response activities discussed earlier: dispatchable demand response load reductions to address loss or unavailability of variable resources and the potential for dispatchable demand response to increase power consumption during over-generation situations.

[39] The "use case" is a concept from the software and systems engineering communities whereby a developer, usually in concert with the end user, attempts to identify all of the functional requirements of a system. Each "use case" essentially describes how a user will interact with a system to achieve a specific goal.

38. It also appears that achieving such demand response capabilities will require additional standardization of the interfaces between systems on the customer premises and utility systems, including addressing data confidentiality issues. The Institute notes that considerable work has been done to develop demand response standards. One standard, Open Automated Demand Response (OpenADR) (developed for the interface between the utility and large commercial customers) has already been referred to the Organization for the Advancement of Structured Information Systems (OASIS). OpenADR has been developed by the Lawrence Berkeley National Laboratory, and is now going through a formal standards development process being coordinated between OASIS and the Utility Communication Architecture International User Group.[40] Accordingly, we would encourage a focus in this area as well.

39. Specifications for customer meters are within the jurisdiction of the States, but it is clear that communication and coordination across the interfaces between the utility and its customers can have a significant impact on the bulk-power system, particularly as new renewable power and climate policy initiatives introduce the need for more flexibility in the electricity grid, which creates the need for increased reliance on demand response and

[40] The Utility Communication Architecture International User Group has also been developing OpenHAN, a specification for the energy services interface between the home area network (HAN) and the utility. Both OpenHan and OpenADR will benefit from the planned extensions of IEC 61850 and the common information model standards described above.

electricity storage. A large portion of electricity storage may ultimately be located on customer premises. As noted in the Institute's Smart Grid Issues Summary, an appropriate starting point for further standards development would be the harmonization of IEC Standard 61850 and several meter standards, namely ANSI C12.19 and C12.22, and we encourage the Institute and industry to work together on this suggestion. The Commission seeks comment from States and other parties on the optimal approach to develop standards in this area, and we will pursue direct communications with the States on this topic through the NARUC-FERC Smart Grid Collaborative and other NARUC Committees.

Electric storage

40. The third key grid functionality is electric storage. If electricity storage technologies could be more widely deployed, they would present another important means of addressing some of the difficult issues facing the electric industry. To date, the only significant bulk electricity storage technology has been pumped storage hydroelectric technology. However, we are aware that new types of storage technologies are under development and in some cases are being deployed, and could also potentially provide substantial value to the electric grid. While further research and development appears necessary before any widespread deployment of such newer technologies can take place, it may nevertheless be appropriate to encourage the identification and standardization of all possible electricity storage use cases at an early stage. There are

existing standards that can be the starting point for interoperability standards development for DER. IEC 61850 addresses communications for DER, and IEEE 1547 has been designated as a federal standard for interconnection.[41]

Electric transportation

41. The fourth key grid functionality is electric transportation. As indicated above, to the extent that new electric transportation options become widely adopted in the near future, maintaining the reliable operation of the bulk-power system will require some level of control over when and how electric cars draw electricity off of the system. At the most basic level, this could be accomplished by providing an ability for distribution utilities to facilitate vehicle charging during off-peak periods so that this new electric load would not increase peak loads and require the development of new peak generation, demand response and/or more transmission to urban load centers that are being targeted for these vehicles. A more advanced implementation could offer vehicle owners the option to voluntarily limit their charging to times when variable renewable generation is producing power or to permit utilities the limited use of the aggregated capabilities of these vehicles for various grid-related purposes such as bulk power storage or ancillary services.

[41] See Energy Policy Act of 2005, Pub. L. No. 109-58, sec. 1254, 110 Stat. 594, 970 (2005), adding a new subsection 111(d)(15) to the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. 2621(d)).

42. Ultimately we would hope for a smarter grid to accommodate a wide array of advanced options for electric vehicle interaction with the grid, including full vehicle-to-grid capabilities. However, assuming full vehicle-to-grid capabilities cannot be achieved immediately, we would encourage the Institute's process to focus on the development of appropriate standards, or extensions to relevant existing standards, to provide at least the minimum communications and interoperability requirements that are necessary to permit some ability for distribution utilities to facilitate vehicle charging during off-peak load periods. The Institute's Smart Grid Issues Summary notes that the Society of Automotive Engineers (SAE) has developed two draft standards, SAE J2836 and SAE J2847, which address communications and price signals/demand response respectively. These standards are on the SAE 2009 Ballot. Looking forward to the potential provision of ancillary services to the grid by electric vehicles, electrical interconnection issues must be dealt with along with potential expansion of communications ability. To this end, we urge the SAE and the automobile industry to plan data communications systems between electric vehicles and the grid that are able to be upgraded. We also urge the Institute to include electric vehicles in its DER standards development.

43. Several of the preceding paragraphs discuss the development of use cases or other standards that appear similar to business practice standards development, in order to help shape and identify the functional needs that the Institute's technical interoperability standards development process will address. Since the North American Energy

Standards Board (NAESB) has a great deal of experience in helping the electric and natural gas industries successfully negotiate business practice standards, it may be helpful to the Institute to engage NAESB resources in the development of these use cases and other business practice-like standards. We seek comment as to whether the Institute would be helped by the incorporation of resources from other organizations such as NAESB into the development of these various business practice-like standards.

44. The Commission seeks comment on whether the priorities and reliability principles articulated above are appropriate, and whether there are other priorities or reliability principles that should be included in order to address potential challenges to the operation of the bulk-power system.

C. Interim Rate Policy: Guidance for Smart Grid-Related Filings by Jurisdictional Entities

45. Given the trends discussed above, Smart Grid policies should encourage utilities to deploy systems in the near term that advance efficiency, security, and interoperability in order to address potential challenges to the bulk-power system. A key consideration for utilities when determining whether to adopt such systems will be whether they are able to recover the costs of these deployments in regulated rates. Another key consideration may involve the potential for stranded costs associated with legacy systems that are replaced by Smart Grid equipment. Additionally, as the electric system may require several of the new capabilities of the Smart Grid before interoperability standards have been developed, we recognize the need for guidance for jurisdictional entities. Thus, to offer some rate

certainty and guidance regarding cost recovery issues, the Commission is proposing a rate policy for the interim period until final interoperability standards are adopted.

46. FPA section 205 requires that all rates for the transmission or sale of electric energy subject to the Commission's jurisdiction be just and reasonable.[42] In evaluating expenses for which cost recovery is appropriate, one of the criteria the Commission relies on is whether the facilities are "used and useful."[43] Once interoperability standards are completed, the Commission will consider making compliance with those standards a mandatory condition for rate recovery of jurisdictional Smart Grid investments. For now, we propose as an interim rate policy to accept rate filings, including single issue rate filings, submitted under FPA section 205 by public utilities to recover the costs of Smart Grid deployments involving jurisdictional facilities provided that certain showings are made. In other words, we propose to consider Smart Grid devices and equipment, including those used in a Smart Grid pilot program or demonstration project, to be used and useful for purposes of cost recovery if an applicant makes the following showings.

47. We propose that an applicant must show that the reliability and security of the bulk-power system will not be adversely affected by the deployment at issue. Second,

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[42] 16 U.S.C. 824d.

[43] The general rate-making principle is that expenditures for an item may be included in a public utility's rate base only when the item is "used and useful" in providing service. See NEPCO Municipal Rate Committee v. FERC, 668 F.2d 1327, 1333 (D.C. Cir. 1981).

the filing must show that the applicant has minimized the possibility of stranded investment in Smart Grid equipment by designing for the ability to be upgraded, in light of the fact that such filings will predate adoption of interoperability standards. Finally because it will be important for early Smart Grid deployments, particularly pilot and demonstration projects, to provide feedback useful to the interoperability standards development process, we propose to direct the applicant to share information with the Department of Energy Smart Grid Clearinghouse, provided for in the ARRA.[44]

48. In order to satisfy our first concern about reliability and security, we propose that applicants will be required to address the security concerns discussed in the previous section on the development of key standards. Accordingly, an applicant must show how its proposed deployment of smart grid equipment will maintain compliance with Commission-approved reliability standards, such as the Critical Infrastructure Protection Reliability Standards, during and after the installation and activation of Smart Grid technologies so the reliability and security of the bulk-power system will not be jeopardized. An applicant must also address: (1) the integrity of data communicated (whether the data is correct); (2) the authentication of the communications (whether the communication is between the intended Smart Grid device and an authorized device or person); (3) the prevention of unauthorized modifications to Smart Grid devices and the

[44] ARRA sec. 405(3).

logging of all modifications made; (4) the physical protection of Smart Grid devices; and (5) the potential impact of unauthorized use of these Smart Grid devices on the bulk-power system.

49. Regarding the second concern about stranded smart grid investment, we propose to require a showing that the applicants have made good faith efforts to adhere to the vision of a Smart Grid described in Title XIII of the EISA, including optimizing asset utilization and operating efficiency. In general, applicants should attempt to adhere to the principles of the Gridwise Architecture Council Decision-Maker's Interoperability Checklist.[45] In practice, we will place the most weight on an applicant's adherence to the following principles: (1) reliance to the greatest extent practical on existing, widely adopted and open[46] interoperability standards; and (2) where feasible, reliance on systems

[45] See Gridwise Architecture Council Decision-Maker's Interoperability Checklist Draft Version 1.0, available at http://www.gridwiseac.org/pdfs/gwac_decisionmakerchecklist.pdf (Interoperability Checklist).

[46] An open architecture is publicly known, so any and all vendors can build hardware or software that fits within that architecture, and the architecture stands outside the control of any single individual or group of vendors. In contrast, a closed architecture is vendor-specific and proprietary, and blocks other vendors from adoption. An open architecture encourages multi-vendor competition because every vendor has the opportunity to build interchangeable hardware or software that works with other elements within the system. See Gridwise Architecture Council Decision-Maker's Interoperability Checklist Draft Version 1.0, available at http://www.gridwiseac.org/pdfs/gwac_decisionmakerchecklist.pdf. We note that Congress recently made utilization of open protocols and standards, if available and appropriate, a condition of receiving funding from the Department of Energy for

(continued…)

and firmware that can be securely upgraded readily and quickly. Adherence to these two key principles should minimize the possibility of stranded smart grid investment by making it less likely that equipment replacement will be required once final standards are approved.

50. Regarding the information sharing concern, the following information should be shared with the Department of Energy Smart Grid Clearinghouse: (1) any internal or third party evaluations, ratings, and/or reviews including all primary source material used in the evaluation; (2) detailed data and documentation explaining any improvement in the accurate measurement of demand response resources; (3) detailed data and documentation explaining the expansion of the quantity of demand response resources that resulted from the project and the resulting economic effects; (4) detailed data and documentation for any improvements in the ability to integrate variable renewable generation resources; (5) detailed data and documentation that shows any achievement of greater system efficiency through a reduction of transmission congestion and loop flow; (6) detailed data and documentation showing how the information infrastructure supports DER such as plug-in electric vehicles; and (7) detailed data and documentation that shows how the project resulted in enhanced utilization of energy storage. To the extent

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demonstration projects and grants pursuant to EISA sections 1304 and 1306. See American Recovery and Reinvestment Act, Pub. L. No. 111-5, sec. 405(3) and 405(8), __ Stat. ___, ___ (2009).

that the Department of Energy specifies additional criteria for making grants under the ARRA for Smart Grid demonstration and pilot projects, the Applicant should agree to share information relevant to those criteria as well.

51. Finally, consistent with the policy of supporting the modernization of the Nation's electric system announced in EISA section 1301, the Commission also proposes to permit applicants to file for recovery of the otherwise stranded costs of legacy systems that are to be replaced by smart grid equipment. However, an appropriate plan for the staged deployment of smart grid equipment, which could include appropriate upgrades to legacy systems where technically feasible and cost-effective, could help minimize the stranding of unamortized costs of legacy systems. Accordingly, we propose that any filing for the recovery of stranded legacy system costs must demonstrate that such a migration plan has been developed.

52. The Commission will also entertain requests for rate treatments such as accelerated depreciation and abandonment authority (whereby an applicant is assured of recovery of abandoned plant costs if the project is abandoned for reasons outside the control of the public utility) specifically tied to Smart Grid deployments under our FPA section 205 authority. Any requests for such rate treatments for Smart Grid deployments will need to address all of the concerns discussed above for rate recovery and make the same showings described in that section. We would also consider applying these rate treatments to the portion of a smart grid pilot or demonstration project's cost that is not

already paid for by Department of Energy funds, such as those authorized by EISA sections 1304 and 1306.[47] To the extent that such showings are made, we propose to consider permitting abandonment authority to apply to any Smart Grid investments that, despite reasonable efforts, could not be made upgradeable and must ultimately be replaced if found to conflict with the final standards to be approved under the Institute's standards development process.

53. The Commission invites comments on all aspects of this proposed interim rate policy.

III. Comment Procedures

54. The Commission invites comments on this proposed policy statement [Insert_Date 45 days after publication in the **FEDERAL REGISTER**].

IV. Document Availability

55. In addition to publishing the full text of this document in the Federal Register, the Commission provides all interested persons an opportunity to view and/or print the contents of this document via the Internet through FERC's Home Page (http://www.ferc.gov) and in FERC's Public Reference Room during normal business hours (8:30 a.m. to 5:00 p.m. Eastern time) at 888 First Street, N.E., Room 2A, Washington D.C. 20426.

[47] To be codified at 42 U.S.C. 17384, 17386.

56. From FERC's Home Page on the Internet, this information is available on eLibrary. The full text of this document is available on eLibrary in PDF and Microsoft Word format for viewing, printing, and/or downloading. To access this document in eLibrary, type the docket number excluding the last three digits of this document in the docket number field.

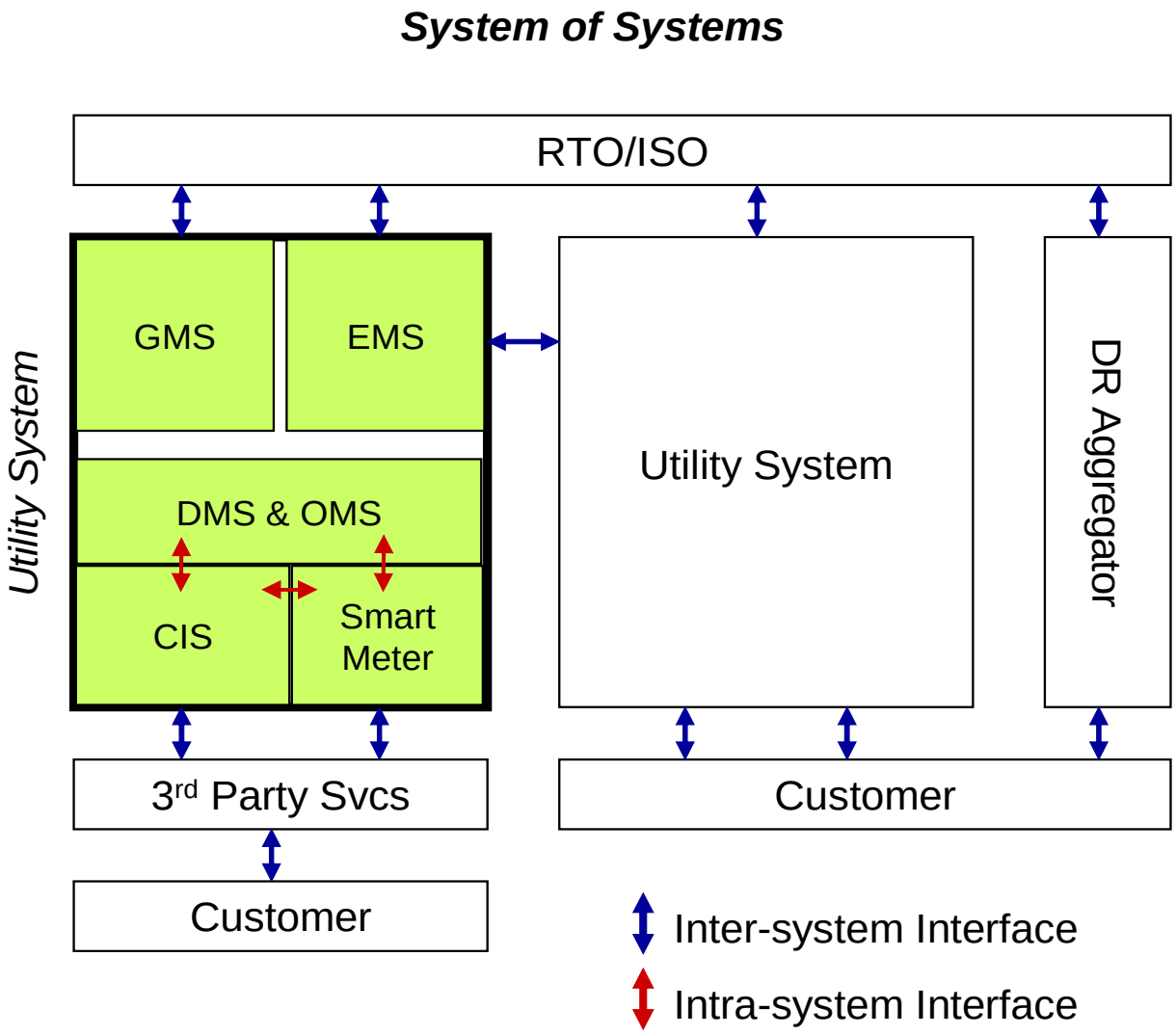
57. User assistance is available for eLibrary and the FERC's website during normal business hours from FERC Online Support at 202-502-6652 (toll free at 1-866-208-3676) or email at ferconlinesupport@ferc.gov, or the Public Reference Room at (202) 502-8371, TTY (202)502-8659. E-mail the Public Reference Room at public.referenceroom@ferc.gov.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

Appendix A



Source: Smart Grid Standards Adoption: Utility Industry Perspective, OpenSG Subcommittee of the Utility Communication Architecture International User Group, and Smart Grid Executive Working Group.

Document Content(s)

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January 28, 2009

TO: NAESB Executive Committee and Interested Industry Participants
FROM: Rae McQuade, NAESB Executive Director
RE: Schedule of 2009 Meetings

Below is the schedule of 2009 meetings for the Executive Committee, Board of Directors and Advisory Council.

2009 Calendar of Board and EC Meetings

Date	Meeting	Location
March 26	Board of Directors	Houston – Marriott IAH
June 25	Board of Directors Meeting and Meeting of the Members	Houston – Marriott IAH
September 24	Board of Directors	Houston – Marriott IAH
December 10	Board of Directors	Houston – Marriott IAH
February 3-5	Executive Committee (WEQ, Retail, WGQ)	Phoenix, Hosted by SRP
February 14	Advisory Council Meeting	Washington D.C. – Renaissance Washington Hotel (in conjunction with NARUC Winter Meeting)
May 12-14	Executive Committee (WEQ, Retail, WGQ)	Carmel, IN hosted by ACES Power
August 18-20	Executive Committee (WEQ, Retail, WGQ)	Colorado Springs hosted by El Paso Western Pipelines
October 27-29	Executive Committee (WEQ, Retail, WGQ)	Richmond, VA hosted by Dominion