

June 29, 2009

Iryn S. Gamolo
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116-390 Village Blvd.
Princeton, NJ 08540

Subject: OATI Informal Comments on e-Tag Specification Version 1.8.1

Dear Mr. Gamolo,

OATI staff has reviewed the latest version of the tagging specification available from NERC per request. OATI has found that most of the changes are limited to revised wording, terminology, or other cosmetic changes in the document and do not require functional changes to OATI software. Of the functional changes, there is one on which OATI would like to provide comments. In section 3.6.1.1.1, the following text was added:

"In addition, all messages must be sent to any forwarding URL registered to a PSE, BA, or Transmission Service Provider in the distribution list. These forwarded messages shall not impact the Delivery State of the associated entity."

OATI believes that it is in the best interest of the industry to remove this change (i.e. remove the new text quoted above) for the following reasons:

1. Listeners receiving data via the new URL have no way of querying the tag authority for missing data, and therefore cannot be considered a fully reliable and accurate information source. Without additional changes to the e-Tag specification, any query that requires a callback (QuerySummaries, for example) will fail because the callback message will be sent to the registered agent or approval URL. The agent or approval service receiving an unsolicited callback message should then flag the message as a security threat (because it is receiving callback messages that it did not request). This limitation means that it is not possible to have a reliable system receiving the messages sent to this forwarding URL making its overall value to users questionable.
2. The e-Tag specification should not require the sending of messages to services not defined within the e-Tag specification. Such services could (legitimately) respond in unpredictable ways, potentially causing problems for tag authorities or other systems used by tagging because there is no requirement in the specification dictating exactly how they must respond. If additional services are required, then they should be identified and incorporated within the e-Tag specification with a clear set of functional/technical requirements for that service.
3. The ability to freely define forwarding URLs makes the industry's tagging infrastructure less secure, and more prone for abuse. Intentionally or unintentionally tag data could be sent to entities that should not have access to the tag data. In addition, the ability to add a forwarding URL without some controls or oversight could easily be used to test new systems and interfaces. Testing of new systems and interfaces should not be conducted on production systems as such practices unnecessarily load production systems, or introduce instability to the production environment.
4. The field in the NERC registry that is intended to hold the new URL (called "Forward_URL") currently contains invalid data. JISWG will need to coordinate with NERC to ensure that the

invalid data is removed. JISWG would also need to verify that the existing NERC registry user interface allows users to set this field in an appropriate manner.

5. This change could add significant additional loading to tag authority services depending on the extent that this new capability is enabled by registered entities. Given the lack of the ability to rely on the data delivered to the forwarding URL and the unpredictability of the loading on tag authority services, the implementation of such a requirement does not appear warranted.
6. With the Interchange standards approved by FERC, which include financial impacts to industry entities, the stability of the e-Tagging systems is increasingly important. Introducing residual requirements into the specification unnecessarily adds risk to an entity's ability to meet the standards.

In light of these reasons, OATI recommends that the text in question be removed from the 1.8.1 version of the e-Tag specification.

Sincerely,

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