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July 29, 2011

PPL EnergyPlus, LLC (PPL EPLU) Comments:

NAESB WEQ for Network Integration Transmission Service (NITS) on OASIS

PPL EPLU supports the OASIS subcommittee's efforts to develop business practices as required by FERC Order No. 890 that improve the current operation of the wholesale electric market to develop and maintain business practice and communication standards for OASIS and Electronic Scheduling.

PPL EPLU also supports the subcommittee's efforts related to the development of business practices regarding the processing and evaluation of transmission service requests, which use NERC mandated TTC/ATC/AFC and CBM/TRM calculation methodologies. The NERC Long Term ATC/AFC TF (LTATF) process, which included NAESB participation, has identified a number of issues related to the calculation and coordination of ATC and AFC.

The business practices that are adopted should ensure that regardless of the TTC/ATC calculation methodology used (MOD-028, MOD-029, MOD-030), Transmission Service Providers (TSPs) are required to identify and define, both internally and at their boundaries, the extent and location of any system congestion. TSPs should also be required to develop fair consistent study methods for determining Existing Transmission Commitments, System Operating Limits, and outage events, for all periods (hourly, daily, weekly, monthly, and yearly) both internally and off-system.

The proposed business practices should be applicable to all TSPs:

- to ensure that consistent practices are employed when processing requests for transmission service;
- to ensure that consistent posting and scheduling practices are employed; and
- to ensure that details of the practices and procedures are available to market participants.

The business practices should strive for standardization where possible but at a minimum should require disclosure of the methodology by which TSPs:

- determine the quantity of transmission service to be made available for sale to market participants.

- accept schedules for transmission previously purchased; and
- post ATC on the OASIS for external and internal congestion points.

In addition, in developing this methodology, each TSP should, to the maximum extent possible, be required to:

- use similar models and assumptions within equivalent operating timeframes for both internal and external congestion points;
- use models and assumptions for the sale of transmission service that are similar to those used for the planning of the transmission system;
- assure comparability of service for long term firm point to point and network service customers.
- assure appropriate coordination between TSPs such that the sale of transmission service by one provider appropriately reflects the impacts on affected systems; and
- assure existing network resource interconnection service (NRIS) generation retains its full injection rights.

These requirements are necessary, so the TSP's Customers can fully evaluate all system conditions for choosing which available transmission options best fit their needs while simultaneously meeting all TSP OATT and business practice requirements.

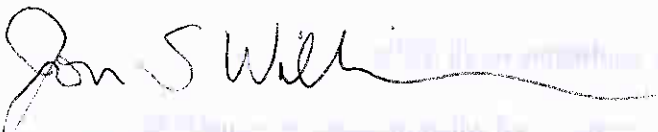
In summary, the proposed standard and associated business practices should be applicable to all TSPs to ensure transparency, fairness, and consistent practices with respect to:

- processing requests for transmission service,
- posting and scheduling practices, and
- availability of business practices and procedures to market participants.

The proposed standards and associated business practices should also ensure that Network Service to existing loads and resources with NITS and NRIS is not degraded.

The potential benefits include increased standardization of procedures and better informed market participants, which would enhance market liquidity. Additionally, this should result in better utilization of the transmission system and lower costs for transmission customers.

Thank you for the opportunity to comment.



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