FORMAL COMMENTS

Quadrant:　　　　　　Wholesale Electric Quadrant

Change Request:　　　**R05018/R07005**

Submitted By:　　　　Ed Skiba for Midwest ISO

Date:　　　　　　　　July 13, 2007

Request Title: R05018 Revise the e-Tag Specification to allow PSEs associated with a transmission segment in the tag optional approval rights.

Comments: We are requesting the WEQ Executive Committee seek additional clarification of this change control and the implications of approving the change control. The May 15-16, 2007, JISWG draft meeting minutes tend to suggest that scope of the recommendation is more than just approving a revision to document. Please see the highlighted references extracted from the draft meeting minutes:

> NAESB Items on e-Tag
> 2007 Annual Plan Item 3 a (i) 2 (iv) Identify e-Tag enhancements to support business practices (including e-Tag specification changes – R05018)
> The group explained that these changes were already included in the updated Coordinate Interchange Standards. In addition, the changes were included in e-Tag Spec 1.7.097 and will be carried over into the new version 1.8. Mr. Sorenson asked if it was time to make e-Tag a standard, as the group is drafting changes and standards for it. Mr. Hansen said e-Tag has always been both commercial and reliability and it does not seem logical to split it up at this time. Mr. Sorenson said the advantage of having e-Tag as a standard is that it could be cited as such. Therefore, there is some level of enforcement. Mr. Hansen asked that further discussion on moving e-Tag to a commercial standard be held until the June 6th meeting.
>
> The group drafted a Recommendation for R05018. The document is posted at http://www.naesb.org/pdf2/weq_jiswg051507w6.doc. Mr. Sorenson moved that the JISWG move Recommendation R05018 out of subcommittee and to the EC for its formal 30-day comment period, pending ESS/ITS approval. Mr. Fisher seconded the motion. The motion passed by consensus. The ESS/ITS will consider the Recommendation during their May 18, 2007, conference call.

1. R05018 scope is to "revise" the e-Tag Specification. However, we could not find any documentation on the WEQ EC approving or the members ratifying the previous versions of e-Tag Specification. By WEQ EC approval and member ratification of this Recommendation does that imply the e-Tag Specification in its entirety will be

included in the next release of the NAESB Standards Booklet as implied in the JISWG meeting minutes?

2. The e-Tag Specification is a joint NAESB/NERC document developed by the JISWG. However, at the time the recommendation was approved by the JISWG a split had not been to clarify what portions of the document fall under NAESB and what portions fall under FERC, as noted by the statement: "Mr. Hansen asked that further discussion on moving e-Tag to a commercial standard be held until the June 6th meeting." If the e-Tag Specification is to be included in the Business Practices Booklet will revenue neutrality issues also need to be worked out between NAESB and NERC before the document can be included in the Business Practices?

3. Though the e-Tag Specification is a joint document, NERC is not including this document in its reliability standards and does not follow the NERC standards approval process when updating the document. Why would NAESB include the e-Tag Specification in its Business Practices Booklet which will be filed at FERC while NERC does not include it in the reliability standards filed with FERC?

4. If the Recommendation is only limited to the fixed scope (Revise the e-Tag Specification to allow PSEs associated with a transmission segment in the tag optional approval rights) as documented in the recommendation, it is not clear how the WEQ EC can approve a revision to a document, which has not previously been approved by the EC and ratified by the members.

5. If the Recommendation is to include the entire e-Tag Specification in the NAESB Business Practices, the recommendation should reflect that scope and the entire version of the e-Tag Specification should be attached to the recommendation.

Based on these comments I'd recommend to the WEQ EC remand the Recommendation back to the JISWG for further clarification. However, if the Executive Committee decides to move forward on the recommendation and the scope is such that it will result the e-Tag specification being included in the next release of the NAESB Business Practices, I'd ask the WEQ EC to consider including the entire e-Tag Specification in the materials sent out for member ratification so the members are aware of what is being ratified.

Request Title: R07005 Request to allow BAs to Adjust Dynamic Schedule Transaction Type Tags within the ATF changes rules.

Comments: Like the request R05018 this change request is also a revision to the e-Tag Specification. However, this is a revision to version 1.8, which is a later version of the specification than what is being requested in R05018. If the WEQ EC has not approved and the members have not ratified version 1.8 of the e-Tag Specification, how can the WEQ EC move forward on approving a revision to a document that has not been previously approved or ratified?