



FORMAL COMMENTS

Quadrant: Wholesale Electric Quadrant (WEQ)

Interpretation: **C07001** – Request for Interpretation whether the WEQ Standard 011-1.2 applies to a generation facility that uses natural gas only as a start-up fuel, but not otherwise for operation

Submitted By: Ed Skiba for Midwest ISO

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Midwest ISO is submitting the following comments on interpretation “**C07001** – Request for Interpretation whether the WEQ Standard 011-1.2 applies to a generation facility that uses natural gas only as a start-up fuel, but not otherwise for operation” for consideration by the WEQ Executive Committee (EC).

Midwest ISO has reviewed the Interpretation as drafted by the WEQ Interpretations Subcommittee (IS) and is in agreement with the interpretation of WEQ 011-1.2 in that it was not intended to include non-gas fired generation. We found the justification with references/cites to other sections of the Business Practice WEQ 011 and FERC Order No. 698 helpful in providing insight as to why the Interpretations Subcommittee made their interpretation. Since this is the first interpretation required by the WEQ IS, we suggest the WEQ EC inform the WEQ IS that all future interpretations require not only the interpretation but also the justification/explanation as was done in this interpretation.