



NORTH AMERICAN ENERGY STANDARDS BOARD

801 Travis, Suite 1675 • Houston, Texas 77002 • Phone: (713) 356-0060 • Fax: (713) 356-0067

email: naesb@naesb.org • Web Site Address: www.naesb.org

March 26, 2012
Filed Electronically

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street N.E., Room 1A
Washington, D.C. 20585

RE: Notice Providing For Reply Comments, Availability of e-Tag Information to Commission Staff (Docket No. RM11-12-000)

Dear Ms. Bose:

The North American Energy Standards Board (NAESB) herewith submits these comments regarding Notice Providing For Reply Comments, Availability of e-Tag Information to Commission Staff (Docket No. RM11-12-000), in which the Federal Energy Regulatory Commission (Commission) is proposing to require the Commission-certified Electric Reliability Organization to make available to Commission staff, on an ongoing basis, access to complete electronic tagging data used to schedule the transmission of electric power in transmission markets. These comments are submitted voluntarily.

Communications concerning these comments can be directed to:

Mr. Jonathan Booe
Deputy Director
North American Energy Standards Board
801 Travis Street, Houston, Texas 77002
Phone – 713-356-0060
Email Address: naesb@naesb.org

The report is being filed electronically in Adobe Acrobat® Portable Document Format (.pdf). All of the documents are also available on the NAESB web site (www.naesb.org). Should you have need of the filing in editable format, we can provide it in Microsoft® Word® 2010.

Respectfully submitted,

Jonathan Booe

Mr. Jonathan Booe
Deputy Director, North American Energy Standards Board



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cc: Chairman Jon Wellinhoff, Federal Energy Regulatory Commission
Commissioner Philip D. Moeller, Federal Energy Regulatory Commission
Commissioner John R. Norris, Federal Energy Regulatory Commission
Commissioner Cheryl A. LaFleur, Federal Energy Regulatory Commission

Mr. Michael C. McLaughlin, Office Director, Office of Energy Market Regulations, Federal Energy Regulatory Commission
Mr. Michael Bardee, General Counsel of the Commission, Federal Energy Regulatory Commission

Mr. Joseph McClelland, Director, Office of Electric Reliability
Ms. Jamie Simler, Director, Office of Energy Policy and Innovation
Mr. Mason Emnett, Associate Director, Office of Energy Policy and Innovation

Mr. David Cook, General Counsel, North American Electric Reliability Corporation
Mr. David Taylor, Director of Standards Regulatory Compliance, North American Electric Reliability Corporation

Mr. Michael Desselle, Chairman and CEO, NAESB Board of Directors
Ms. Rae McQuade, President, NAESB
Mr. William P. Boswell, General Counsel, NAESB

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

**Availability of e-Tag Information
to Commission Staff**

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Docket No. RM11-12-000

COMMENTS OF THE NORTH AMERICAN ENERGY STANDARDS BOARD

The North American Energy Standards Board (“NAESB”) is voluntarily submitting these comments with regard to the Notice Providing For Reply Comments, Availability of e-Tag Information to Commission Staff (Docket No. RM11-12-000)¹, in which the Federal Energy Regulatory Commission (Commission) is proposing to require the Commission-certified Electric Reliability Organization to make available to Commission staff, on an ongoing basis, access to complete electronic tagging data used to schedule the transmission of electric power in transmission markets..

The North American Energy Standards Board (NAESB) is a non-profit member-driven organization formed to add efficiency to the industry through the development of standards. NAESB was created with the support of the Department of Energy (DoE) for the purpose of developing voluntary standards and model business practices designed to promote more competitive and efficient natural gas and electric services that streamline the transactional processes of the natural gas and electric industries. NAESB and its predecessor organization, the Gas Industry Standards Board (GISB), have developed voluntary consensus-based standards in these industries for nearly twenty years with the support of the Federal Energy Regulatory Commission (FERC), the DoE, the North American Electric Reliability Corporation (NERC), the National Association of Regulatory Utility Commissioners (NARUC) and state utility commissions, among other governmental and industry entities. Organizations such as NAESB develop standards supporting the interoperability and the success of the modern electric grid.

NAESB’s involvement in e-Tag activities began in 2007 with the formation of the NERC/NAESB Joint Interchange Scheduling Work Group (JISWG) and their continued development of the e-Tag functional specification. Now renamed the Joint Electric Scheduling Subcommittee (JESS)², the group is currently engaged in the development of Electronic Tagging Functional Specification version 1.8.2. Membership in the JESS subcommittee is open to all interested parties, and membership in NAESB is not a requirement for participation or voting, and leadership is jointly shared between NERC and NAESB.

In 2009, NERC and NAESB leadership transferred the ownership of the Electronic Tagging Functional Specification to NAESB. Since that time, the JESS has submitted updates of the specification to NAESB Wholesale Electric Quadrant’s Executive Committee for approval as an implementation guide.

The JESS has considered FERC’s request to obtain all e-Tags. While NAESB does not take a position on the request, should the Commission determine to require access to the complete electronic tagging data used to schedule the transmission of electric power in transmission markets, the JESS notes that there may be fairly simple technical approaches to meet FERC’s request to receive all e-Tags. Existing e-Tag mechanisms with some modification can support the distribution of e-Tag information to the FERC. It should be noted further, if the access for e-Tags is limited to a definable subset of all e-Tags, changes may be required for the current 1.8.1 version of the e-Tag specification. NAESB and its subcommittees are willing to engage in further discussions in the support of FERC’s request for e-Tag information.

We appreciate the opportunity to provide these comments to the Commission, and look forward to supporting the Commission’s direction in whichever manner the Commission deems appropriate. If there are any questions or additional information is required, do not hesitate to contact the NAESB office (713-356-0060, naesb@naesb.org).

¹ The FERC Notice Providing For Reply Comments, Rulemaking Docket No. RM11-12-000, can be accessed from <http://www.gpo.gov/fdsys/pkg/FR-2012-03-02/html/2012-5002.htm>

² On the NAESB web site, the Joint Electronic Scheduling Subcommittee activities, including those to create eTag specifications, Version 1.8.2, can be monitored from the following hyperlink: http://www.naesb.org/weq/weq_jess.asp, and the eTag specifications, Version 1.8.1, can be accessed from the following hyperlink: http://www.naesb.org/weq/weq_jess_etag_1.8.1.asp.