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

RE: Standards for Business Practices of Public Utilities (Docket No. RM05-5 et al)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") herewith submits this report to the Federal Energy Regulatory Commission ("FERC" or "Commission") regarding errata to Version 2.1 of the NAESB Wholesale Electric Quadrant ("WEQ") Standards, provided to the Commission on February 19, 2009. This NAESB report is voluntarily submitted by NAESB in response to Docket Nos. RM05-5 et al. The NAESB WEQ Version 2.1 standards were ratified by NAESB membership and published on March 11, 2009. The minor corrections to WEQ 001, WEQ 003, WEQ 004 and WEQ 008 included in this report were unanimously adopted by the WEQ Executive Committee on May 12, 2009.¹

The report is being filed electronically in Microsoft® Word® 2003 and in Adobe Acrobat® Print Document Format (.pdf). All of the documents are also available on the NAESB web site (www.naesb.org). Please feel free to call me at (713) 356-0060 or refer to the NAESB website (www.naesb.org) should you have any questions or need additional information regarding the errata to the NAESB WEQ Version 2.1 standards or any other NAESB work products.

Respectfully submitted,

Rae McQuade
Ms. Rae McQuade
President & COO, North American Energy Standards Board

¹ The May 12, 2009 WEQ Executive Committee draft meeting minutes can be found through the following hyperlink: http://www.naesb.org/pdf4/weq_ec051209dm.doc
cc:

Chairman Jon Wellinghoff, Federal Energy Regulatory Commission
Commissioner Suedeen Kelly, Federal Energy Regulatory Commission
Commissioner Philip D. Moeller, Federal Energy Regulatory Commission
Commissioner Marc Spitzer, Federal Energy Regulatory Commission

Ms. Cynthia Marlette, General Counsel of the Commission, Federal Energy Regulatory Commission
Mr. Joseph McClelland, Director, Office of Electric Reliability, Federal Energy Regulatory Commission
Ms. Jamie L. Simler, Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Mr. Ryan Irwin, Office of Energy Market Regulation, Federal Energy Regulatory Commission
Mr. Michael Goldenberg, Senior Attorney, Office of General Counsel, Federal Energy Regulatory Commission
Mr. Bruce McAllister, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission
Ms. Valerie Roth, Office of Energy Market Regulation, Federal Energy Regulatory Commission

Mr. Michael Desselle, Chairman and CEO, North American Energy Standards Board
Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Mr. David Cook, General Counsel, North American Electric Reliability Corporation
Mr. Andrew Rodriquez, North American Electric Reliability Corporation
REPORT OF THE NORTH AMERICAN ENERGY STANDARDS BOARD

The North American Energy Standards Board ("NAESB") is voluntarily submitting this report in accordance with the Commission's Orders in the above referenced docket. The report is in two parts – the errata for NAESB Wholesale Electric Quadrant ("WEQ") Version 2.1 Standards; and Notice to WEQ Members of Executive Committee Adoption of Minor Corrections, including the NAESB Operating Procedure for Minor Clarifications and Corrections to Standards.
This Appendix contains the errata for the following NAESB WEQ Version 2.1 Standards processed in three minor corrections:

Minor Correction 1: WEQ-003-0  OASIS Data Dictionary element definition for “SYSTEM_ATTRIBUTE”

Minor Correction 2: WEQ-001-10.8  OASIS Business Practice Requirements for Redirects on a Non-Firm Basis
WEQ-004-2  Coordinate Interchange Standards
WEQ-004-A  Coordinate Interchange Standards, Appendix A – Electronic Tagging Service Performance Requirements and Failure Procedures, B. Failure Procedures
WEQ-008-0.20  Transmission Loading Relief –Eastern Interconnection Standards

Minor Correction 3: WEQ 001-1.5  OASIS Business Practice Requirements for Obligation of Transmission Providers and Responsible Parties
WEQ 001-1.6  OASIS Business Practice Requirements for Information to be Posted on the OASIS
WEQ 001-1.7  OASIS Business Practice Requirements for Auditing Transmission Service Information
WEQ 001-1.8  OASIS Business Practice Requirements for Obligations of OASIS Users
TO: NAESB Wholesale Electric Quadrant Executive Committee

FROM: Denise Rager, NAESB Staff

RE: Minor Correction to NAESB WEQ Business Practice Standards, Version 002.1

DATE: February 27, 2009

After reviewing the WEQ-003-0 data dictionary element definition for “SYSTEM_ATTRIBUTE”, it was determined a publication error had occurred during the application of Final Action 2008 WEQ Annual Plan Item 2.a.i.4, 2.b.v.4, 2.b.v.5, (link http://www.naesb.org/member_login_form.asp?doc=fa_2008_weq_api_2ai4_2bv4_2bv5.doc ) which was ratified by the WEQ membership on July 23, 2008 for SYSTEM_FORECASTED_LOAD.

The following minor correction should be applied to NAESB WEQ Business Practice Standards, version 002.0 (WEQ-003-0) OASIS Data Dictionary, version 1.5:

Data Dictionary Element Name: SYSTEM_ATTRIBUTE

Definition of Data Element (Redline):

SYSTEM_FORECASTED_LOAD – anticipated-Anticipated portion of the-Forecasted Daily System-Wide Peak Load for the native load

Definition of Data Element (Clean):

SYSTEM_FORECASTED_LOAD – Anticipated Forecasted Daily System-Wide Peak Load
Following is a draft of the four instances where the e-Tag specification is mentioned. The WEQ-001 item needs discussion.

**WEQ 001-10.8:**
TPs shall have the right, but are in no means obligated, to accept requests for Redirect on a Non-Firm basis based on the submission of an Electronic Tag (e-Tag) using protocols compliant with Version 1.8 of the NERC Transaction Information System Working Group (TISWG) Electronic Tagging Functional Specification.

>[the implementation of e-Tag 1.8 included the removal Next Hour Service from the Electronic Tagging Functional Specification – this is a problem]

**WEQ 002:**
Until other means are adopted by NAESB, the primary method of submitting the Request For Interchange (RFI) to the Interchange Authority shall be electronic using protocols compliant with the Electronic Tagging Functional Specification, Version 1.8.

**WEQ 004-A Appendix A – Electronic Tagging Service Performance Requirements and Failure Procedures, B. Failure Procedures:**

**Interchange Authority Service Entity** – The entity that provides the Interchange Authority service for an e-Tag. The Interchange Authority service itself is typically a computer system that maintains the master database for the tag and communicates status with other computer systems. The Interchange Authority Service Entity is the utility industry entity that is responsible for providing the service. In the Electric Industry Registry, this entity's URL is specified by the Sink Balancing Authority.

**WEQ 008-0.20:**
Midwest ISO is requesting that the WEQ Executive Committee delete the content of WEQ001-1.5 through WEQ001-1.8 as a minor correction. We believe deleting these sections meets the criteria of a minor correction based upon FERC actions and prior actions taken by the WEQ Executive Committee.

According to the NASB Operating Practices Minor Corrections include:

(a) clarifications or corrections made by a regulatory agency to standards that are of a jurisdictional nature, or by the American National Standards Institute or its successor;
(b) clarifications or corrections to the format, appearance, or descriptions of standards in standards documentation;
(c) clarifications or corrections to add code values to tables; and
(d) clarifications and corrections that do not materially change a standard.

Background FERC Actions:

On May 9, 2005, the Commission issued its Notice of Proposed Rulemaking (NOPR) R05-005-000 Standards for Business Practices and Commission Protocols for Public Utilities. Paragraph 25 states:

With the exception of standards, discussed below, involving standards that duplicate the requirements in our regulations (OASIS Business Practice Standard 1, including Standards 1.1 through 1.8, and in the Definitions of “Affiliate,” “Responsible party,” “Reseller,” “Transmission Provider,” “Transmission Customer,” and “Wholesale merchant function”), we believe that the WEQ’s OASIS Business Practice Standards are consistent with the Commission’s existing standards on this topic.2

On April 26, 2005, the Commission issued Order Number 676 incorporating by reference the WEQ NAESB Business Practices Version 0. This Final Rule did not incorporate WEQ001-1.5 through WEQ001-18 as documented in paragraph 19:

The specific standards developed by the WEQ that we are incorporating by reference in this Final Rule are as follows:

2 In addition, although we are proposing to incorporate by reference OASIS Business Practice Standard 10.6, we have problems with this provision that we are asking commenters to address in their comments on this NOPR.
Business Practices for Open Access Same-Time Information Systems (OASIS) (WEQ-001, Version 000, January 15, 2005, with minor corrections applied on March 25, 2005, and additional numbering added October 3, 2005) including Standards 001-0.2 through 001-0.8, 001-2.0 through 001-9.6.2, 001-9.8 through 001-10.8.6, and Examples 001-8.3-A, 001-9.2-A, 001-10.2-A, 001-9.3-A, 001-10.3-A, 001-9.4.1-A, 001-10.4.1-A, 001-9.4.2-A, 001-10.4.2-A, 001-9.5-A, 001-10.5-A, 001-9.5.1-A, and 001-10.5.1-A;

On July 21, 2008, the Commission issued Order Number 676-C incorporating by reference the WEQ NAESB Business Practices Version 1. This Final Rule also did not incorporate WEQ001-1.5 through WEQ001-18 as documented in paragraph 9:

The specific NAESB standards that we are incorporating by reference in this Final Rule are:

Business Practices for Open Access Same-Time Information Systems (OASIS), Version 1.4 (WEQ-001, Version 001, Oct. 31, 2007, with minor corrections applied on Nov. 16, 2007) including Standards 001-0.2 through 001-0.8, 001-0.14 through 001-0.20, 001-2.0 through 001-9.6.2, 001-9.8 through 001-12.5.2, and 001-A and 001-B;

Background WEQ Executive Committee Actions:

On October 15, 2007, the WEQ Executive Committee met via conference call and determine the change to remove all of WEQ009 could be done under a minor correction citing Order 676 where the Commission determined they would not include WEQ009 in the Final Rule “because they duplicate the Commission’s regulation on this subject” as noted in paragraph 72. The “Minor Correction to NAESB WEQ-009 Standards of Conduct” dated October 17, 2007, provides additional detail on the WEQ Executive Committee’s action http://www.naesb.org/pdf3/weq_mc101707weq009.doc.

Summary:

Based on the references cited above, removing the content of WEQ 001-1.5 through WEQ 001-1.8 meets the criteria for a minor correction based on precedence established by the WEQ Executive Committee in 2007. With this minor correction we are requesting that the WEQ Executive Committee take a similar action on the WEQ 001-1.5 through WEQ 001-1.8 requirements as it did with the WEQ 009 requirements which were not incorporated in either FERC Orders 676 or 676-C.

This Appendix contains the correspondence sent to all Wholesale Electric Quadrant members notifying them of the Executive Committee action taken on the minor corrections, requesting comments that opposed the minor corrections, and informing them of future actions and timelines related to the minor corrections. It also contains the excerpt from the NAESB Operating Procedures detailing the procedures to be followed for minor clarifications and corrections to existing NAESB Standards.
May 15, 2009

TO: NAESB Wholesale Electric Quadrant (WEQ) Members and Interested Industry Participants

FROM: Cory Galik Cummings, Staff Attorney

RE: Minor Correction to NAESB WEQ Version 002.1 Standards approved by the WEQ Executive Committee on May 12, 2009

Dear WEQ Members:

The WEQ Executive Committee voted to adopt a minor correction to the NAESB WEQ Version 002.1 Standard WEQ-003-0 data dictionary element definition for “SYSTEM-ATTRIBUTE” as submitted by NAESB staff and approved by the WEQ Executive Committee on May 12, 2009. The minor correction can be found at the following link: http://www.naesb.org/pdf4/weq_mc051509_attach2.doc.

The WEQ Executive Committee voted to adopt a minor correction to the NAESB WEQ Version 002.1 Standards WEQ-001-10.8, WEQ 004-2, WEQ 004-A Appendix A – Electronic Tagging Service Performance Requirements and Failure Procedures, B. Failure Procedures and WEQ 008-0.20 as submitted by JISWG and approved by the WEQ Executive Committee on May 12, 2009. The minor correction can be found at the following link: http://www.naesb.org/pdf4/weq_mc051509_attach1.doc.

The WEQ EC voted to adopt a minor correction to NAESB Version 002.1 Standards to remove the content of WEQ 001-1.5 through WEQ 001-1.8 as submitted by Midwest ISO and approved by the WEQ Executive Committee on May 12, 2009. The minor correction can be found at the following link: http://www.naesb.org/pdf4/weq_mc051509_attach3.pdf.

The WEQ EC voted unanimously to pass the minor corrections that affect the above mentioned standards. The draft minutes from the WEQ Executive Committee meeting on May 12, 2009 will be posted shortly. The minor corrections can be accessed on the NAESB web site at the following address: http://www.naesb.org/eqg/weq_regcom.asp. For further information on the minor correction as submitted by NAESB staff, please contact Ms. Denise Rager, (713) 356-0060. For further information on the minor corrections as submitted by the JISWG, please contact Mr. Robert Harshbarger, (425) 462-3348. For further information on the minor corrections as submitted by MISO, please contact Mr. Ed Skiba, (317) 249-5377.

Pursuant to NAESB’s procedures for adopting minor corrections (found at pp. 18-19 of the NAESB Operating Procedures (NAESBOPs) and shown following), the public comment period for the minor correction will begin today, May 15, and end on May 29, 2009. If no comments are received, the corrections will be applied to the NAESB WEQ Version 002.1 Standards effective May 29, 2009 and will be posted in the final actions portion of the NAESB web site.

Should you have any concerns or issues with the minor correction, please notify the NAESB office by May 29, 2009 (email: naesb@naesb.org, fax 713-356-0067).

Best Regards,

Cory Galik
Procedures for Minor Corrections as excerpted from the NAESB Operating Procedures

D. Minor Clarifications and Corrections to Standards

Minor clarifications and corrections to existing standards include: (a) clarifications or corrections made by a regulatory agency to standards that are of a jurisdictional nature, or by the American National Standards Institute or its successor; (b) clarifications or corrections to the format, appearance, or descriptions of standards in standards documentation; (c) clarifications or corrections to add code values to tables; and (d) clarifications and corrections that do not materially change a standard.

Any request for a minor clarification or correction to an existing standard should be submitted in writing to the executive director. This request shall include a description of the minor clarification or correction and the reason the clarification or correction should be implemented.

1. Processing of Requests

The executive director shall promptly notify the EC and any appropriate subcommittee(s) of the receipt of the request. The members of the applicable quadrant’s EC shall promptly determine whether the request meets the definition of a minor clarification or correction. Through the decision of the vice chair of the applicable quadrant, this determination may be delegated to one of the quadrant’s subcommittees, with the concurrence of the subcommittee chair, in which case the subcommittee shall make a prompt decision.

If the request is determined to meet the definition of minor clarification or correction, the applicable quadrant’s EC, with input from any subcommittee(s) to which the request has been forwarded, shall act on the request within one month of its receipt. A meeting to discuss the request is not required; the decision may be made by notational vote. A simple majority of the votes received shall determine the outcome. The members of the applicable quadrant’s EC shall be given at least three working days to consider and vote on the request.

2. Public Notice

The results of the vote on the request for a minor clarification or correction shall be posted on the NAESB website and the members of the applicable quadrant shall be notified of the request by e-mail. If the request has been approved by the applicable quadrant’s EC, the notification shall include a brief description of the request, the contact name and number of the requester so that further information can be obtained, and the proposed effective date of the clarification or correction. The proposed effective date of the minor clarification or correction shall normally be one month from the date of the public notice.

Any interested party shall have an opportunity to comment on the request, and the comments shall be posted on the NAESB website. The comment period is two weeks.

3. Final Disposition of Approved Requests

If no comments are received on an approved request, the standard shall be clarified or corrected as specified in the approved request on the effective date proposed. If comments are received, they shall be forwarded to the members of the applicable quadrant’s EC for consideration. Each comment requires a public written response from the applicable quadrant’s EC. The applicable quadrant’s EC shall determine whether changes are necessary as a result of the comments.

Members of the applicable quadrant’s EC shall be given three working days to consider the comments and determine the outcome, which shall be decided by a simple majority of the votes received. A meeting to discuss the request is not required; the decision may be made by notational vote. The standard shall be clarified or corrected in accordance with the outcome of the vote, effective with the completion of voting, and notice thereof shall be posted on the NAESB website.