North Carolina Electric Membership Corporation

Comments to NAESB WEQ OASIS Subcommittee on 2015 WEQ Annual Plan Items 7.a, 7.b, and 7.d Recommendations

Submitted by John Lemire

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NCEMC is a transmission dependent utility and LSE who is responsible for the full or partial power supply requirements of its 25 member distribution cooperatives throughout the state of North Carolina. NCEMC’s distribution cooperative loads are located throughout the service areas of three investor-owned public utilities: Duke Energy Carolinas, LLC and Duke Energy Progress, Inc., both subsidiaries of Duke Energy Corporation, and Virginia Electric and Power Company, doing business as Dominion Virginia Power in Virginia and as Dominion North Carolina Power in North Carolina.

# 2015 WEQ Annual Plan Item 7(a) – One-Day ATC Narrative

Within the scope of the Annual Plan Item 7(a), NCEMC is supportive of these changes to provide Zero ATC narratives for each Constrained Path and ATC change narratives within one business day.

Outside the scope of this Annual plan item, we feel that language in the Standard is vague and does not provide meaningful information. NCEMC feels that the following should be addressed in the Standard:

1. Addition of metrics for reporting whether or not the Transmission Provider provided the ATC narrative within the one business day time period.
2. Identify penalty for failure to provide comments within the required time period..
3. Include minimum requirements for language in narrative to increase visibility and provide more meaning. Review of Transmission Providers OASIS identified comments such as “All ATC/AFC has been reserved” and “[Path Name] changed due to load forecast”. This type of language does not provide sufficient transparency for customers to make meaningful decisions.

# 2015 WEQ Annual Plan Item 7(b) – Dynegy and Entergy Order

NCEMC participated in the OASIS Subcommittee meetings during the drafting of the language and changes to WEQ-001-9.5 and WEQ-001-10.5. We recognize the need to update these standards to comply with the directives of the Commission’s policy in Dynegy Power Marketing, Inc. and Entergy Services, Inc. Orders. We support the standards only addressing Redirects on a firm basis from Parent Reservations that are unconditional and staying silent on conditional redirects to allow the Transmission Provider to address any specific needs they have for their system.

# 2015 WEQ Annual Plan Item 7(d) – Coordinated Group Conditional Reservation

No comments