**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Document:** 2016 WEQ Annual Plan Item 5.d (Review and modify as necessary WEQ-004, EIR Business Practice Standards, e-Tag Specification, and e-Tag Schema to make the necessary modifications to recognize the Market Operator Role within the Electric Industry Registry)

**Submitted By:** ISO/RTO Council’s Standards Review Committee

**Date:** July 20, 2016

We appreciate the opportunity to provide formal comments related to adding the Market Operator to the NAESB Business Practice Standards and the Electronic Tagging Functional Specification. Below are our comments associated to the various documents

**General Comment**

1. The Electronic Tagging Functional Specification with version number is referenced in Business Practice Standards WEQ-002, WEQ-003, WEQ-004, and WEQ-013. The version number should be updated in these Business Practice Standards to version 1.8.3 in these documents.

**WEQ-004 Coordinate Interchange**

1. Appendix B – Paragraph under heading **MO, GPE, LSE, and TPSE Approval Rights** suggest that the revised language “these Entities” be changed to “these entities.”

**WEQ-023 Electric Industry Registry**

1. No comments

**Electronic Tagging Functional Specification**

1. Suggest removing the references for the “Coordinate Interchange Scheduling Subcommittee” and “Revised by WEQ CISS” from the title page. This is the only document found on the Wholesale Electric Quadrant Standards and Implementation Guidelines that identifies the subcommittee that created the document. It may have been appropriate to have the subcommittee listed when it was a joint NERC and NAESB document. Now that it is a NAESB only document the reference should be removed.
2. INT-007-1 – There are multiple references on INT-007-1 in the functional specification. NERC retired this standard on September 30, 2014. The references to this standard should be removed.
3. **Section 1.1.2 e-Tag Related References**:
   1. The link to “Information related to the CISS” should be changed to <https://www.naesb.org/weq/weq_ciss.asp>
   2. The link to the most recent copy of the e-Tag 1.8.3 XML Schema will need to be updated.
4. **Section 1.2 Definitions** – In the definition for Scheduling Entity suggest lower casing “Implementing” to be consistent with the NERC definition.
5. **Section 1.4.2.2 Security Keys –** This section discusses NERC assigning Security Keys for interaction with the IDC. Now that NERC no longer has responsibility for the IDC does NERC still assign Security Keys? If not this section needs to be updated. (Note there is also a reference to the NERC assigned Security Key in section 5.6.3.1 Processing of a Request Resolution Distribution
6. **Section 3.6.1.1.1 Identifying the Distribution List** – in this section both “CCLlist” and “CCList” are both used. If these are the same a consistent term should be used.
7. **Section 3.6.1.3 Processing a Profile Change Request Submission** – In the redline changes “Tag authors” should be changed to “Tag Authors”, since Tag Author is a defined term.
8. **Section 8.2.2 Creation of the Revised Specification and/or Schema** – This section of the document should be marked as Reserved and the text removed. With NERC dissolving the NERC IS the document is now a NAESB only document and development and approval of the specification follows the NAESB governance documents.
9. **Appendix B ATF Timing Consideration** – The appendix states the “table is temporary until the NAESB Business Practice Standards clearly define the timing requirements for ATF e-Tags.” WEQ-004-22 in the Version 3.1 standards provides this clarity. Should this appendix be removed or is the concern now that this appendix is needed until FERC incorporates the NAESB standards by reference into the Code of Federal Regulations? If the table can now be removed, there a multiple reference to Appendix B that will need to be updated throughout the document.

**XML Schema**

1. In the Schema in a documentation for ErrorNumRef it states “<xsd:documentation>Reference to a NERC-registered error</xsd:documentation>.” Does NERC still maintain the list of registered errors? If not who maintains the list?