**FORMAL COMMENTS**

**Quadrant:** Wholesale Electric Quadrant (WEQ)

**Recommendation:** WEQ 2013 Annual Plan Item 3.d (Develop Electric Industry Registry Business Practice Standards)

**Submitted By:** IESO, ISO New England, MISO, NYISO, PJM, and SPP

**Date:** August 12, 2013

The ISOs/RTOs listed above are submitting the following comments for consideration by the NAESB Wholesale Electric Quadrant’s Executive Committee when they take action on WEQ 2013 Annual Plan Item 3.d (Develop Electric Industry Registry Business Practice Standards).

* In section xxx-1.1.3 there is an”Error! Reference Source not found.” statement that needs to be corrected.
* Suggest changing the statement in xxx-1.4 Contact Information from “Each BA must register an e-Tag Authority URLs” to “Each BA in the EIR must register an e-Tag Authority Service, with the exception of local BAs that are registered as BAs and within an ISO or RTO with business rules that preclude the need for e-Tag Authority Service.”

The rationale behind this change is that there are some local BAs that do not have an e-Tag Authority Service URL today and have no need for a establishing an e-Tag Authority Service URL. In these instances the ISO or RTO serving as the BA has the e-Tag Authority Service URL.