**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Document:** 2016 AP Item 5(b) Create a new OASIS mechanism that allows for the merger of like reservations without the use of the resale mechanism (R09015)

**Submitted By:** ISO RTO Council’s Standard Review Committee

**Date:** August 18, 2016

The IRC’s SRC welcome the opportunity to provide formal comments related to the OASIS Subcommittee proposed standards to address Standards Request R09015. We appreciate the work the subcommittee performed to address our informal comments. Below are our formal comments.

WEQ-000 Abbreviations, Acronyms, and Definition of Terms

1. A typographical error was introduced into the definition of Parent Reservation. “existing An, confirmed reservation” should be changed to “An existing confirmed reservation.”

WEQ-001 OASIS Business Practice Standards

1. In requirement 001-11-3 the second occurrence of transmission service should be capitalized.
2. In requirement xx001-xx1.3 we recommend adding a comma after e.g.
3. We recommend moving requirement xx001-xx3.3 to another section of the requirements. Section xx001-xx3.3 focused on the evaluation process. Requirement xx001-xx3.3 specifies an action to be taken after the evaluation process. The following is how we propose resequencing the requirements.

**xx001-xx3** The Transmission Provider shall evaluate the Consolidation to verify that the requested capacity of each of the reservations being consolidated does not exceed the Uncommitted Capacity held on each firm PTP Parent Reservations over the term requested.

**xx001-xx3.1** Submission of a request for Consolidation in an amount that exceeds a firm PTP Parent Reservation’s current Uncommitted Capacity shall be deemed an invalid request.

**xx001-xx3.2** The request for Consolidation of long term service shall not be eligible for conveyance of rollover rights. All rollover rights will remain on the firm PTP Parent Reservation(s).

**~~xx001-xx3.3~~** ~~The request for Consolidation shall inherit the conditional nature of the Parent Reservations being consolidated and shall be considered unconditional upon confirmation.~~

**xx001-xx3.3~~4~~** All rights and obligations shall remain on the Parent Reservations until the request for Consolidation is confirmed.

**xx001-xx3.4~~5~~** The Transmission Provider shall reduce the Transmission Customer’s Uncommitted Capacity on the Parent Reservations by the capacity consolidated once the Consolidation is confirmed.

**xx001-xx3.5~~6~~** Curtailments or other capacity reductions affecting the reserved capacity on the Consolidation reservation shall not affect the Parent Reservations nor result in a reinstatement of capacity on the Parent Reservations.

**xx001-xx4** Consolidation shall have all the rights and obligations of an original reservation for firm PTP with the exception of renewal/rollover rights.

**xx001-xx5** For the purposes of Curtailment and other capacity reductions, a confirmed Consolidation shall be treated comparably to all other types of firm PTP.

***xx001-xx6*** *The request for Consolidation shall inherit the conditional nature of the Parent Reservations being consolidated and shall be considered unconditional upon confirmation.*

**xx001-xx7~~6~~** Redirect of a ConsolidatION

**xx001-xx7~~6~~.1** The Transmission Customer may Redirect firm rights combined through a Consolidation in accordance with the Business Practice Standards WEQ-001-9.

**xx001-xx8~~7~~** Resales of a ConsolidatION

Any Transmission Customer (Reseller) may offer for sale the scheduling rights associated with the PORs and PODs of a firm Consolidation reservation (i.e., Parent Reservation). Any Eligible Customer (Assignee) may request to purchase scheduling rights from the Reseller in accordance with the Business Practice Standards WEQ-001-11.

**xx001-xx9~~8~~** SERVICE ACROSS MULTIPLE TRANSMISSION SYSTEMS

**xx001-xx9~~8~~.1** A Consolidation reservation may be used in establishing the contiguity requirements of a Coordinated Group

**xx001-xx9~~8~~.2** A request for Consolidation shall not be used as a Coordinated Request.