**FORMAL COMMENTS**

**Quadrant:** Wholesale Electric Quadrant

**Recommendation:** **Number:** 2011 AP Item 7.a

**Title:** Review standards 001-14.1.3 and 001-15.1.2 based on FERC Order No. 676-E

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

**Date:** September 8, 2011

The proposed changes to WEQ 001-14.1.3 and 001-15.1.2 highlighted in red can produce unintended consequences. The Standard creates undue ambiguity by estasblishing a requirement that performance occur within one (1) business day **or as soon as feasibly possible**”. Because there has been no work done to determine how to measure compliance with this type of open-ended wording, the performance standard to which entities would be subject is unduly vague. This can also create inconsistency with the manner in which enforcement authorities measure compliance with the Standard.

**001-14.1.3 Zero ATC Narrative Timing**

 The Transmission Provider shall post a zero ATC narrative for each Constrained Posted Path within one (1) business day or as soon as feasibly possible, but not to exceed five (5) business days, of meeting the criteria specified in Business Practice Standards WEQ-001-14.1.1 or WEQ-001-14.1.2.

**001-15.1.2 ATC Change Narrative Timing**

 The Transmission Provider shall post an ATC change narrative within one (1) business day or as soon as feasibly possible, but not to exceed five (5) business days, of meeting the criteria identified in Business Practice Standard WEQ-001-15.1.1.

Alternative language the Executive Committee may want to consider is listed below in redline format

**001-14.1.3 Zero ATC Narrative Timing**

 The Transmission Provider shall post a zero ATC narrative for each Constrained Posted Path meeting the criteria specified in Business Practice Standards WEQ-001-14.1.1 or WEQ-001-14.1.2. The Transmission Provider shall strive to post the narrative within one (1) business day and must post the narrative within five (5) business days.

**001-15.1.2 ATC Change Narrative Timing**

 The Transmission Provider shall post an ATC change narrative meeting the criteria identified in Business Practice Standard WEQ-001-15.1.1. The Transmission Provider shall strive to post the narrative within one (1) business day and must post the narrative within five (5) business days.