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OATI Comments to NAESB on Version 1.8.1 E-Tag Specification and Schema
October 5, 2009

Open Access Technology International, Inc. (OATI) has the following comments to the proposed Version 1.8.1 E-Tag Specifications and Schema currently posted for formal comment.

<u>Forwarding URLs</u>

As currently stated in the proposed Electronic Tagging Functional Specification, the Tag Authority services are required to forward the e-Tag messages to the Secondary Service URL, with the burden to support this functionality (including the financial burden associated with modifying the Tag Authority service) resting exclusively with the Balancing Authorities. However, the entities that benefit from this additional functionality are those required to provide for the Tag Approval and Agent services. Therefore, it appears there is an inequity of financial responsibility for the improvement of the tagging infrastructure between those Entities required to provide for this functionality versus those entities that benefit from the added functionality.

While the software changes to support the proposed tag forwarding scheme are not significant, the number of e-Tag messages that the Tag Authority service would be obligated to send to these forwarding URL services may increase by an order of magnitude, perhaps as much as 20 times or more. To support this, as yet unknown, increase in messaging volume while maintaining compliance with the current NERC Coordinate Interchange (INT) standard for Interchange Authority distribution of messages within the mandated timing requirements may place a significant additional cost on the (Sink) Balancing Authorities. Because of the uncertainty of knowing how many entities may chose to register forwarding URLs or even when those forwarding URLs may be registered over time, Tag Authority services would have to be sized for a worst case assumption on the needed infrastructure to support this added messaging obligation and still guarantee compliance with the message delivery obligation under the INT Standards. If a Balancing Authority is not prepared for such a contingency, they may be faced with violation of their message delivery obligations and bear responsibility for attendant sanctions and potential penalties should the loading to support the forwarding URL messaging take an unanticipated jump due to the registration of new forwarding URLs. As noted above, the cost associated with supporting the forwarding URL functionality and associated infrastructure will be the responsibility of the Balancing Authorities, but is caused by the actions taken by others.

To better associate the costs of the proposed functionality to those entities that cause and benefit from this functionality, the following two alternatives could be considered:

> **<u>Alternative #1</u>** - Modify the Tagging Specification to move the Tag Forwarding functionality from the Tag Authority service section to the Approval and Agent service sections. For example, if a Tag Approval service adds a Secondary Service URL, it is the Tag Approval service responsibility to forward the e-Tag messages it receives to the appropriate Secondary Service URL. This equalizes the benefit of the functionality to the burden. To accomplish this, the following change to the Tagging Specification could be utilized:
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>> *Section 1.2*: Modify the definition of Secondary Service URL, as follows:
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>>> A single URL registered in conjunction with an Agent or Approval Service URL for a secondary Agent or Approval Service. This secondary service receives a copy of all e-Tag request messages from the Service URL, sent by an Authority Service to the Service URL. The manner in which the Secondary Service URL is configured is dependent on the registry implementation; with the registry that is in-use for e-Tag version 1.8.1, the "Forwarding URL" field is used for this purpose.

Section 1.4.9.2: Remove the second paragraph:

> Remove "Messages sent from an authority service to a Secondary Service URL shall be kept for a minimum of seven (7) days from the time that the message was sent."

Section 2.6.2: Add the following paragraph immediately after the second paragraph:

> If the message passes validation and a Secondary Service URL is registered for the Agent Service PSE, the valid message received by the Agent Service must be sent to its Secondary Service URL.

Section 3.6.1.1.1: Remove the paragraph following the second set of bullet items:

> Remove "In addition, the messages, including callbacks, must be sent to the Secondary Service URL registered to any PSE, BA, or Transmission Service Provider in the distribution list.   This does not apply to any URL that matches a Service URL. These forwarded messages shall not impact the Delivery State of the associated entity."

Section 4.6.2: Add a fourth bullet item with the following:

- If the message passes validation and a Secondary Service URL is registered for the Approval Service, the valid message received by the Approval Service must be sent to its Secondary Service URL.

Alternative #2 - Modify the E-Tag Specification to remove the sole responsibility of the Tag Authority service to forward the e-Tag messages, and create a new service altogether, for instance, Forwarding Service. Those entities that wish to have their e-Tag messages forwarded need to provide a Forwarding Service, or contract a Forwarding Service from the e-Tag service providers. Again, as with Alternative 1 above, the burden to support the forwarding of e-Tag messages lies exclusively with the benefiting entity. This would require additional rewrite effort within the proposed Tagging Specification.

Implementation Plan

The current draft of the implementation plan affords very little time between specification approval and implementation. To accomplish the infrastructure enhancements that may be required to support the proposed Version 1.8.1 specification, additional time should be incorporated within the implementation plan between approval of the Tagging specification and start of testing.