**Concept Discussions**

**BPA**

1. Submission Simultaneous Windows (SSW) for ROFR Requests
   1. Tie breaker- queue time of Defender reservation
   2. TP to decide window time frame
      * Comment 1
      * Standard Changes
        1. xx.4.6.5.2
   * Pros
     + Provides a level playing field between customers (SSW FERC policy)
     + Easy standards modifications
     + Can be accomplished with optionality
   * Cons
     + This is slightly different from FERC guidance
     + Creating another level of tie breaker criteria
     + A way of avoiding competition if all customers submit within the window
     + Queue time of the defender may not be the best way to level the playing field for the fourth criteria
     + Introduces variability in response time deadlines and provides inconsistency between systems/industry
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support this change at this time
2. “Best Offer” option for Defenders with ROFR
   1. Only for unsuccessful match situation (doesn’t apply to those who opted not to match or failed to submit a ROFR match)
      * Comments 2a-2l
      * Standard Changes
        1. 2a – x001-xx.4.6.2.9
        2. 2b – x001-xx.4.6.5.3 & x001-xx.4.6.5.4
        3. 2c – x001-xx.4.6.7.2, x001-xx.4.6.7.3, & x001-xx.4.6.7.4
        4. 2d – 002-4.3.6.6.1
        5. 2e – 002-4.3.6.6.1
        6. 2f – 002-4.3.6.6.2
        7. 2g – x002-6.1
        8. 2h – 003-0
        9. 2i – x013-6.3
        10. 2j – x013-6.3
        11. 2k – x013-6.3
        12. 2l – no change
   * Pros
     + Remedies a situation in which capacity preempted with ROFR is awarded to a Defender without ROFR
     + It conforms to established reservation priorities
     + Does not fundamentally change the standards (not substantial)
     + Potential increase the utilization of the transmission system
   * Cons
     + Adds more optionality to the standard
     + Re-evaluation adds more time to the competition
     + Requires an addition of more confirmation time limit to the competition
     + Adds more complexity to the process
     + Recommended approach does not address how much capacity is at risk from multiple ROFR Defenders in the re-evaluation
   * Subcommittee response
     + Subcommittee voted to continue OASIS discussion on the issue of an Best Offer proposal to recommend to the EC.
3. Early Conclusion of Declined ROFR
   1. When ROFR Defender expressly declines to match, act on it at that time (regardless of status of other ROFR Defenders
   2. Reduce capacity
   3. Reset competition flags for Defender and it’s Dependents
      * Comments 3a-3d
      * Standard Changes
        1. 3a – x001-xx.4.6.4.1
        2. 3b – x001-xx.4.6.5.1
        3. 3c – x013-6.3
        4. 3d – x013-6.3
   * Pros
     + Allow certain Defenders that decline ROFR the chance to immediately conclude their participation in the competition so they can proceed with any business with their remaining capacity
     + The proposal resets the competition flags for the Defender and its Dependents that was skipped in our original recommendation
   * Cons
     + Allow Defenders a that immediately conclude their participation a higher queue order in the processing of normal business.
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision to support this change

**NCEMC**

1. Capacity from Parent
   1. Allow defender to use additional capacity from Parent to fulfil matching profile additions
      * Comment 3
      * Standard Changes
        1. x001-xx.4.6.2.7
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support this change to allow the defender to use additional capacity from Parent to fulfil matching profile additions due to the complexity of the assessment

**APS**

1. Treatment of Coordinated Requests
   1. perhaps confusion because can be defenders if not accepted or counteroffered but can be if they don’t have status of CR\_ACCEPTED or CR\_COUNTEROFFER.
      * Comment 2b
      * Standard Changes
        1. x001-xx.1.13.1
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support a CR that has not been acted on by a TP (CR\_ACCEPTED or CR\_COUNTEROFFERED) is still available for the P&R Process. Once it is acted on by the TP, it may stay in that state until all other CRs has been acted on. Which could be and extended time. That extended time frame makes it virtually impossible to know when the P&R Process would be complete and that violates the requirement to not initiate the P&R Process if it cannot be completed on time.

If they were included in the P&R Process they would be treated as a non-rofr defender and are being held hostage by a third party during the P&R Process. And it seemed not fair to treat them as non-rofr but it didn’t seem fair to treat them as rofr because they might not go forth with the confirming capacity due to others action. With this in mind the subcommittee opted to provide the exclusion.

1. Self Waivers
   1. Such broad action in response to the “self” waiver does not seem advisable without further prioritizing.
      * Comment 2e
      * Standard Changes
        1. x001-xx.4.3.4
        2. x001-xx.4.3.4.1
        3. x001-xx.4.3.4.2
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support making a change to this self waiver concept as propose by APS.
2. Remaining Profiles
   1. defenders should have a unilateral right to re-profile or withdraw impacted requests
      * Comment 2g
      * Standard Changes
        1. None
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support making a change to this concept as the standards in 4.6.2.8 and 4.7.1.1 allow for this flexibility.
3. Dependent relations
   1. Resales vs redirects
   2. Parent/dependent relations
      * Comment 2h
      * Standard Changes
        1. None
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support making a change to this concept as the subcommittee followed the guidance of the NASEB standards as indicated by FERC Order 890-A pp819.
4. Competition flag inconsistencies
   1. Publicly available
   2. Standards inconsistent
      * Comment 2i
      * Standard Changes
        1. None
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support making a change to this concept as all the appropriate items are masked and unmasked during the P&R Process with the exception of the competition flags which have precedence of being public.

**OATI**

1. Making modifications that introduce additional complexity
   1. Recommends EC not consider making modifications that introduce additional complexity
      * Comment 1
      * Standard Changes
        1. None
   * Pros
   * Cons
   * Subcommittee response
     + This is just an observation and no comment necessary
2. Flowgates or contract paths
   1. Limiting preemptions by 105%
      * Comment 2
      * Standard Changes
        1. None
   * Pros
   * Cons
   * Subcommittee response
     + This is just an observation and no comment necessary

**DUKE**

1. Resetting competition flags
   1. Reset competing request flag on Defender and associated Dependents when taking capacity from ROFR Defender that didn’t attempt to match
      * Comment 44
      * Standard Changes
        1. x001-xx.4.6.5.1
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision to support making the change.
2. Cleanup of redirects on a NF basis
   * + Comment 48
     + Standard Changes
       1. x001-xx.4.7.3
       2. x001-xx.4.7.3.1
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision to support making the change.

**PJM**

1. Preemption process concludes prior to the Challenger’s scheduling deadline
   * + Comment 4
     + Standard Changes
       1. x001-xx.1.9
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support making a change to this concept because the standard affords time for the challenger to use the new reservation (tagging, resales, etc.).
2. Potential Challengers
   * + Comment 6
     + Standard Changes
       1. x001-xx.2.1.4
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support making a change to this concept because the standards support the FERC Order in 638 and stops gaming issues.
3. Selection of Defenders
   * + Comment 12
     + Standard Changes
       1. x001-xx.4.3.7
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support making a change to this concept because a partial service offer to the challenger would be required and the pre-confirmation flag is turned off so there is uncertainty that the challenger would be bound if the defenders failed to match. The subcommittee felt it unfair to require a defender to match if there were not certainty that the challenger is bound.
4. Preemption with ROFR
   * + Comment 19
     + Standard Changes
       1. x001-xx.4.6
   * Pros
   * Cons
   * Subcommittee response
     + Subcommittee reviewed the comment and made the decision not to support making a change to this concept because there was no actionable suggestion.

**ISO/RTO**

1. Selection of defenders
   1. Time frames of challengers and defenders
   2. Extend vs fill
      * Comment 30
      * Standard Changes
        1. x001-xx.4.3.5.3.1
   * Pros
   * Cons
   * Subcommittee response