We recommend the following for the 2009 Annual Plan Item 2(a)(ii)(3) Rollover Rights on Redirect on a Firm Basis approved by the WEQ EC on June 23, 2009:

http://www.naesb.org/member_login_form.asp?doc=weq_rat062609_weq_2009_ap_2aii3_redline.doc - (Redline)
http://www.naesb.org/member_login_form.asp?doc=weq_rat062609_weq_2009_ap_2aii3_clean.doc - (Clean)

Member Name: Edward Skiha
Segment: Independent Grid Operators/Planners
Sub-Segment: N/A
Member Signature: [Signature]
Member Company: Midwest ISO
Date: July 2, 2009

In addition to casting my vote in support of the recommendation, I’m submitting the following comments with regards to section WEQ-001-9.7.8.2.

The standard, as proposed, is not functionally different than the existing standard. Thus in the spirit of not fixing something that isn’t broken, the Midwest ISO respectfully offers that this paragraph of this standard is prime for review by the larger stakeholder community at a later date.

Unlike other sections of this and other standards, the subject section does not have either built-in protections or the extended time horizon to mitigate dangers of either human error or intentional gaming. Nor does it protect the customer from having to make a crunch decision while waiting for other data. As this hasn’t been a problem to date, it doesn’t warrant holding up this revision, but is one that should be reviewed at a later time.