North American Energy Standards Board

Executive Committee Meeting

Wholesale Electric Quadrant

May 13, 2008

AGA Offices, Washington, DC

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

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	159	• R03017 - Operate Within Limits with comments due April 4. Comments were received from We Energies.	
	167	• 2008 AP 2.b.v.2 Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards with comments due April 16. Comments were received from EPSA.	
	172	• 2008 AP 2.b.iv.1-3 TRM Business Practice Standards to complement the NERC reliability standards for TRM, including specification of the appropriate uses of TRM and when transmission providers may set aside TRM, with comments due May 8. Comments were received from EPSA.	
4		Update on items currently out for comment (discussion, no action to be taken):	**4**
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	186	• 2008 WEQ Annual Plan Item 2.b.vi: Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13, comments due June 4, 2008	

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NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

TAB 1

Welcome and Opening Remarks

WEQ EC Members & Terms

Schedule of 2008 Meetings

Draft Agenda

- This section of the meeting materials includes the welcome and opening remarks, the antitrust statement guidance, the EC members and alternates terms, the schedule of the 2008 meetings and the draft agenda.
- No action is required by the EC for any of these documents.
- The meeting materials are references for agenda item 1 of each of the quadrant meetings.
- Cory Galik will call roll to establish quorum and will serve as the attorney of record for the meeting.
- The WEQ EC chair will entertain motions from the EC members of that quadrant to adopt the agenda. The motions to adopt are simple majority. No changes have been offered to the office since the agenda was distributed.

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

1. Welcome and Opening Remarks

The May Executive Committee meeting will be held in AGA offices in Washington, DC. Meeting arrangements and nearby hotels are posted and were contained in the meeting announcements.

Where:	AGA Offices: 400 North Capitol, Suite 450, Washington, D.C.
Contact:	Veronica Thomason, 713-356-0060
When:	Tuesday, May 13 -- 10:00 a.m. to 4:00 p.m. Eastern

The officers and meeting administration presiding over the Executive Committee meeting are:

Kathy York	- WEQ Chairman
Clay Norris	- WEQ Vice Chairman
Rae McQuade	- President and COO
Cory Galik	- NAESB Counsel
Veronica Thomason	- NAESB Staff
ACE Federal	- Transcription Services

Transcripts will be available and can be ordered either during the meeting through ACE Federal or by contacting the NAESB office after the meeting for further information, 713-356-0060.

To participate by phone and web cast, please call the NAESB office (713-356-0060, naesb@naesb.org) for conference calling information.

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

Antitrust Guidelines

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

1. Antitrust Guidelines

- The antitrust guidelines will be covered by Ms. Cory Galik. The points are:

  Antitrust guidelines direct meeting participants to avoid discussion of topics or behavior that would result in anticompetitive behavior including: restraint of trade and conspiracies to monopolize, unfair or deceptive business acts or practices, price discriminations, division of markets, allocation of production, imposition of boycotts, and exclusive dealing arrangements.

  Any views, opinions or positions presented or discussed by meeting participants are the views of the individual meeting participants and their organizations. Any such views, opinions or positions are not the views, positions or opinions of NAESB, the NAESB Board of Directors, or any NAESB Committee or Subcommittee, unless specifically noted otherwise.

  As it is not the purpose of the meeting to discuss any antitrust topics, if anyone believes we are straying into improper areas, please let us know and we will redirect the conversation.

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

WEQ EC Members & Terms

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NORTH AMERICAN ENERGY STANDARDS BOARD
2008 EXECUTIVE COMMITTEE TERMS – Wholesale Electric Quadrant

TRANSMISSION SEGMENT		**TERM END:**	**SUBSEGMENT:**
Patrick McGovern	Manager - System Services, Georgia Transmission Corporation	12-31-2009	Muni/Coop
Steven C. Cobb	Manager Transmission Services, Salt River Project	12-31-2008	Fed/State/Prov.
Dean Ulch	Principal Engineer, Transmission Policy and Services Group, Southern Company Services	12-31-2008	IOU
Edward Davis	Policy Consultant, Entergy Services, Inc.	12-31-2009	IOU
Julie Voeck	Manager Strategic Policy and Planning, American Transmission Company	12-31-2008	ITC
Bob Harshbarger	OASIS Trading Manager, Puget Sound Energy	12-31-2009	at large
Michael Wells	Director, Market Operations Interface, WECC	12-31-2009	At-Large
GENERATION SEGMENT			
William J. Gallagher	Special Contracts Chief, Vermont Public Power Supply Authority	12-31-2009	Muni/Coop
Kathy York	Sr. Energy Markets & Policy Specialist, Tennessee Valley Authority	12-31-2008	Fed/State/Prov.
Jalal Babik	Manager – Electric Policy, Dominion Resource Services, Inc.	12-31-2008	IOU
John Ciza	Project Manager Energy Policy and Regulatory Affairs, Southern Company Services	12-31-2009	IOU
Ron Mucci	Consultant, Representing Entegra Power Group LLC	12-31-2008	Merchant
Gary Hinners	Director- West regulatory Issues, Reliant Energy, Inc.	12-31-2009	at large
Neal Balu	Director of Transmission Policy, Integrys Energy Services, Inc.	12-31-2009	at large
MARKETERS/BROKERS SEGMENT			
Clay A. Norris	Division Director, Planning, North Carolina Municipal Power Agency #1	12-31-2008	Muni/Coop
Clyde Harmon	Senior Manager, Trading Operations, Tennessee Valley Authority	12-31-2009	Fed/State/Prov.
Ralph Honeycutt	Director of Transmission Analysis & Operations – Merchant Management Group, SUEZ Energy Marketing NA, Inc.	12-31-2008	Not IOU Affiliated
Mark Mitchell	Manager of Power Marketing Supply and Trading Department, Salt River Project	12-31-2009	at large
John Apperson	Director – Commercial and Trading, PacifiCorp Energy	12-31-2008	IOU
V A C A N C Y		12-31-2009	IOU
Barry Green	Barry Green Consulting (representing Electric Power Supply Association (EPSA))	12-31-2009	at large

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DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT		**TERM END:**	**SUBSEGMENT:**
Robert Williams	Director of Regulatory Affairs, Florida Municipal Power Agency	12-31-2008	Muni/Coop
Robert Schwermann	Energy Coordinator, Sacramento Municipal Utility District	12-31-2009	Muni/Coop
Alan Pritchard	Senior Engineer, Duke Energy Corporation	12-31-2008	IOU
Jeffrey C. Mueller	Manager - ERO / RE Policy and Standards Interface, Public Service Electric and Gas Company	12-31-2009	IOU
Robert Martinko	Consultant FERC Compliance, FirstEnergy Service Company	12-31-2008	at large
Syd Berwager	Industry Restructuring Project Manager, Bonneville Power Administration/Power Business Line	12-31-2009	Other
Andy Rodriquez	Manager of Business Practice Coordination, NERC	12-31-2009	At-Large
END USERS SEGMENT			
V A C A N C Y		12-31-2009	at large
V A C A N C Y		12-31-2008	at large
Lou Ann Westerfield	Policy Strategist, Idaho Public Utilities Commission, rep. National Association of Regulatory Utility Commissioners	12-31-2008	Regulator
V A C A N C Y		12-31-2009	at large
V A C A N C Y		12-31-2008	at large
V A C A N C Y		12-31-2009	Large Industrial
Paul Sorenson	Director-Central Markets Strategy, Open Access Technology International, Inc.	12-31-2009	At-Large
INDEPENDENT GRID OPERATORS/PLANNERS			
Stu Bresler	General Manager, Market Operations, PJM Interconnection	12-31-2008	
Jim Castle	Manager, Grid Operations, New York Independent System Operator, Inc.	12-31-2008	
Matt Goldberg	Director Reliability & Operations Compliance ISO New England, Inc.	12-31-2008	
Steve Greenleaf	Director Regional Market Initiatives, California ISO	12-31-2008	
Joel Mickey	Manager Market Operations Support, Electric Reliability Council of Texas	12-31-2009	
Larry Middleton	Technical Manager, Transmission Assets, Midwest Independent Transmission System Operator	12-31-2009	
Charles Yeung	Executive Director Interregional Affairs, Southwest Power Pool	12-31-2009	

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NORTH AMERICAN ENERGY STANDARDS BOARD
2008 EXECUTIVE COMMITTEE ALTERNATES – Wholesale Electric Quadrant

End User Segment		**Sub-Segment**
Bill Heinrich	New York State Dept. of Public Service	Regulators
Distribution/LSE Segment		**Sub-Segment**
Shannon Black	Senior Regulatory and Contracts Specialist, Sacramento Municipal Utility District	Muni/Coop
Gerry Adamski	Vice President of Standards, NERC	At-Large
Generation Segment		**Sub-Segment:**
Joel Dison	Project Manager, Southern Company Generation and Energy Marketing	IOU
Lou Oberski	Director – Electric Market Policy, Dominion Resources Services, Inc	IOU
Francis Halpin	Bonneville Power Administration	Fed/State/Prov.
Marketer/Broker Segment		**Sub-Segment:**
Jeff Ackerman	Manager, CRSP-Energy Mgmt., Western Area Power Administration	Fed/State/Prov
Brenda Anderson	Bonneville Power Administration	Fed/State/Prov
Edison G. Elizeh	PacifiCorp	IOU Affiliated
Greg Locke	Manager, Strategic Analysis, ElectriCities of North Carolina	Muni/Coop
Valerie Crockett	Energy Markets & Policy Specialist, Tennessee Valley Authority	Fed/State/Prov
Carol McCrary	ElectriCities (North Carolina Municipal Power Agency #1)	Muni/Coop
Transmission Segment		**Sub-Segment:**
Barbara Rehman	Policy Development & Analysis, Bonneville Power Administration	Fed/State/Prov.
Tim Ponseti	Tennessee Valley Authority	Fed/State/Prov.
Chuck Feagans	Tennessee Valley Authority	Fed/State/Prov.
Wendy Weathers	Principal Analyst, Salt River Project – Transmission and Generation Operations	Fed/State/Prov
Bob McKee	American Transmission Company	ITC
Brian Weber	Manager – Transmission Strategy and Policy, PacifiCorp	IOU
Jane Daly	Rate & Regulatory Advisor, Arizona Public Service Company	IOU
Marceline Otondo	Regulatory Compliance Advisory, Arizona Public Service Company	IOU
Narinder Saini	Policy Consultant, Entergy Services, Inc.	IOU
J.T. Wood	Southern Company Services	IOU
Daryl McGee	Manager – Transmission Services, Southern Company Transmission	IOU

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Independent Grid Operators/Planners Segment		**Sub-Segment:**
Brent Kingsford	Sr. Operations Regulatory Specialist, CAISO	
Paul Wattles	Supervisor Demand Side Programs, Electric Reliability Council of Texas (ERCOT)	
Bill Blevins	Sr. Market Support Analyst, Electric Reliability Council of Texas (ERCOT)	
Robert Coughlin	Principal Scientist Reliability & Operations Compliance, ISO New England, Inc.	
Cheryl Mendrala	Principal Engineer, ISO New England, Inc.	
Ed Skiba	Technical Manager Standards Compliance and Strategy, Midwest ISO	
Brian Pedersen	Manager Transmission Services, Midwest ISO	
Dean Hartung	Manager Real Time Market Operations, PJM Interconnection	
Carl Monroe	Sr. Vice President Operations & Chief Operating Officer, Southwest Power Pool	
Greg Campoli	Supervisor – Reliability Compliance and Assessment, New York ISO	
Diana Pommen	Director Interjurisdictional Affairs, Alberta Electric System Operator	
Jimmy Womack	Manager-Tariff Administration, Southwest Power Pool	

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

Schedule of 2008 Meetings

North American Energy Standards Board

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December 13, 2007

TO: NAESB Board of Directors and Interested Industry Participants
FROM: Rae McQuade, NAESB Executive Director
RE: Schedule of 2008 Meetings

Below is the schedule of 2008 meetings for the Executive Committee, Board of Directors and Advisory Council. Unless sponsors are noted for the meetings, they have been scheduled for Houston. Should other sponsors volunteer in the next few weeks for 2008, the Houston locations may change:

2008 Calendar of Board and EC Meetings

Date	Meeting	Location
February 4-5	EC Meetings WEQ	Houston – NAESB Office
February 16	Advisory Council Meeting	Washington D.C. in conjunction with the NARUC Winter meetings
February 29	EC Meetings – Joint WEQ and WGQ	Houston – NAESB Office
March 27	Board of Directors	Houston – Marriott IAH
May 13-15	Executive Committee Meetings (WEQ, Retail, WGQ)	Washington D.C. – AGA Offices
June 26	Board of Directors Meeting & Strategic Planning Session	Houston – Wyndham Greenspoint
August 19-21	Executive Committee Meetings (WEQ, Retail, WGQ)	Colorado Springs, CO – EPNG Offices
September 25	Board of Directors	Houston – Wyndham Greenspoint
November 4-6	Executive Committee Meetings (WEQ, Retail, WGQ)	Richmond – Dominion Offices
December 18	Board of Directors	Houston – Wyndham Greenspoint

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

Agenda

North American Energy Standards Board

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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE ELECTRIC QUADRANT DRAFT AGENDA
Tuesday May 13, 2008 – 10:00 am to 4:00 pm E

1. Welcome
   - Antitrust Guidelines
   - Welcome to members and attendees
   - Quorum Establishment: Roll Call of WEQ EC Members and Alternates
   - Adoption of WEQ Agenda (simple majority)

2. Wholesale Electric Quadrant Draft Minutes
   - Adoption of 2-4, 2-5-08 Draft Minutes of the WEQ EC Meeting (simple majority)
   - Adoption of 2-29-08 Draft Minutes of the WEQ/WGQ EC Meeting (simple majority)
   - Adoption of 4-9-08 Draft Minutes of the WEQ EC Meeting (simple majority)
   - Adoption of 4-18-08 Draft Minutes of the WEQ EC Meeting (simple majority)
   - Adoption of 4-24-08 Draft Minutes of the WEQ EC Meeting (simple majority)

3. Discussion and consideration of recommendations for standards, comments submitted, and vote on:
   - 2008 AP 2.a.i.5, 2.a.i.6, 2.a.ii.1-3 - Rebid of Partial Service, Preconfirmation Priority, Metrics, Redispatch Cost Posting (redline version) (super majority)
     - Comments due March 21, 2008. Comments were received from WEQ BPS-ESS-ITS Subcommittees, Midwest ISO, PJM, WEQ SRS, BPA, Southern Company
   - R03017 - Operate Within Limits (redline version) (status quo –simple majority)
     - Comments due April 4. Comments were received from We Energies
   - 2008 AP 2.b.v.2 Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards (status quo –simple majority)
     - Comments due April 16. Comments were received from EPSA.
   - 2008 AP 2.b.iv.1-3 TRM Business Practice Standards to complement the NERC reliability standards for TRM. including specification of the appropriate uses of TRM and when transmission providers may set aside TRM, (status quo –simple majority)
     - Comments due May 8. Comments have been received to date from EPSA.

4. Update on items currently out for comment (discussion, no action to be taken):
   - 2008 WEQ Annual Plan Item 2.b.v.1: Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards (status Quo – simple majority), comments due May 23, 2008
   - 2008 WEQ Annual Plan Item 2.b.vi: Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13 (status Quo – simple majority), comments due June 4, 2008

5. Update on specific issues (no votes or action to be taken):
   - Order No. 890 Plan: Plan, Progress Report, Action Items
   - DSM-EE efforts: Activity Report
   - FERC Order No. 698 effort: Activity Report
   - eTariff Update: Activity Report, FERC Notice of Proposed Rule-making, NAESB Report

6. Subcommittee Updates and Plan Updates – no votes to be taken, except on changes suggested for the 2008 plan or if changes are suggested for the triage directions already approved by both Triage and the WEQ EC
   - Triage Subcommittee:
     - Dispositions 3-5-08, Comments from NGPL
     - R08012 – Add 2 detail (contract) level code values to Validation Code and Message elements in Nomination Quick Response dataset to generate an error message when nominated quantity is below EPSQ (WGQ)

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NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE ELECTRIC QUADRANT DRAFT AGENDA
Tuesday May 13, 2008 – 10:00 am to 4:00 pm E

- R08013 Create a new Nominations Transaction Type code value to support Wheeling service on Rockies Express Pipeline LLC for Nominations and all related documents where Transaction Type appears (WGQ)
- R08014 Create a new Nominations Transaction Type code value to support Operational Sales and Operational Purchases for Nominations and all related documents where Transaction Type appears (WGQ)

- Business Practices Subcommittee (BPS)
- Electronic Scheduling (ESS) and Information Technology (ITS) Subcommittees
- Joint Interchange Scheduling Working Group (JISWG)
- Standards Review Subcommittee (SRS)

7. Review, discuss, identify changes and vote to approve changes to the 2008 Annual Plan to be proposed to the Board of Directors. Redlines will be provided by subcommittee leadership.

8. Board of Directors, Board Committee and Regulatory Updates (no votes or action to be taken)
   - Board Updates – March 27, 2008 Draft Meeting Minutes with discussion on segments and blocks
   - Wholesale Gas and Retail key activities – WGQ Annual Plan, Retail Annual Plan, Bulletin
   - Regulatory Updates:
   - 4-11-08 Errata WEQ Version 1.0,
   - 4-15-08 eTariff NAESB submittal,
   - 4-16-08 Joint Interface Committee NERC, NAESB and IRC submittal,
   - 4-17-08 NERC Request for Extension on Order No. 890,
   - 4-17-08 FERC NOPR on eTariff,
   - 4-21-08 FERC NOPR on WEQ Version 1.0, and
   - 4-29-08 FERC Notice of Extension on Order No. 890

9. New Business
   - Agenda items for August, including session on EC forum of roles and responsibilities

10. Adjourn

Attire – Business Casual

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

TAB 2

Minutes

- Contained in this section are five sets of minutes for approval:
  - 2-4, 2-5-08 Draft Minutes of the WEQ EC Meeting
  - 2-29-08 Draft Minutes of the WEQ/WGQ EC Meeting
  - 4-9-08 Draft Minutes of the WEQ EC Meeting
  - 4-18-08 Draft Minutes of the WEQ EC Meeting
  - 4-24-08 Draft Minutes of the WEQ EC Meeting.
- There were no edits or redlines provided prior to the meeting.
- The WEQ EC chair will entertain motions from the EC members of that quadrant to adopt the agenda. The motions to adopt are simple majority.
- The materials in Tab 2 correspond to agenda item 2.

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March 20, 2008

TO: NAESB Wholesale Electric Quadrant Executive Committee and Interested Industry Participants

FROM: Jonathan Booe, Meeting Administration Counsel

RE: Wholesale Electric Quadrant Executive Committee Meeting Draft Minutes – February 4-5, 2008

NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE ELECTRIC QUADRANT (WEQ)
Monday, February 4, 2008 – 1:00 pm to 5:00 pm Central
Tuesday, February 5, 2008 – 9:00 pm to 4:00 pm Central
Hosted by NAESB – Houston, Texas
DRAFT MINUTES

1. Welcome

Ms. York opened the meeting and welcomed the meeting participants in the room and on the phone. Mr. Booe read the antitrust guidelines. Mr. Booe called the roster of the WEQ Executive Committee members. Quorum was established.

2. Wholesale Electric Quadrant Draft Agenda & Draft Minutes

The Executive Committee reviewed the draft agenda. The participants requested that bullet one under Item 7 – Update of Order 890 Plan Update be given in conjunction with the ESS/ITS and BPS presentations under Item 8, and that the subcommittee updates of Item 8 are given in the following order: Triage; Order 890; ESS/ITS; JISWG; BPS; and SRS. Item 2 - Review of NAESB Procedures for EC Meetings was removed from the agenda, as the presentation was given before the meeting. Mr. Rodriquez moved that the agenda be adopted as modified and Mr. Gallagher seconded the motion. The motion passed without opposition.

The Executive Committee reviewed the revised draft minutes from the November 6, 2007 Executive Committee meeting. The revised minutes were included as supplemental material to the Executive Committee book. Mr. Schwermann moved, seconded by Mr. Rodriquez, to adopt the revised minutes as posted. The motion passed without objection. The final November 6, 2007 minutes are posted on the WEQ Executive Committee page: Final Minutes.

3. Consideration of Recommendations for Standards, Comments Submitted, and Vote

The WEQ Executive Committee next reviewed the recommendation for WEQ 2008 Annual Plan Item 2(i)7 and attachment (OASIS Exemptions, Appendix C, Order 890 modifications to WEQ-001), included in the WEQ Executive Committee book, behind Tab 4, beginning on page 35. A comment was submitted on this recommendation from the ISO RTO Council (IRC) which was also included in the Executive Committee book.

Mr. Castle presented the comment submitted on behalf of the IRC. He stated that he supports Appendix C, but would like to suggest a clarification to the introductory paragraph. Mr. Castle asked that in the case of conflict between the OASIS business standard and a "market design" that a "market design" prevail. He stated that the first come, first serve rule is not implicitly in the NYISO tariff, but is part of their "market design". Mr. Sorenson stated that he supports the modification and crafted some language to express Mr. Castle's concept. Mr. Rodriquez noted that "market design" is a broad term and should be narrowed to a "Commission approved market design." After further discussion, the participants modified the introductory paragraph as follows:

> The OASIS Standards Exemptions provides a central location to identify those broad based exemptions provided to groups of WEQ members per FERC Orders and/or regulations. This appendix is not intended to document individual organization tariff waivers or exemptions. In the event of conflicts between the NAESB OASIS business practices and an individual Commission

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approved tariff~~,~~ or Commission approved market design, the tariff or market design shall prevail as documented in the Introduction section of WEQ-013.

Mr. Ulch stated that he cannot support the recommendation because he believes it is an unnecessary restatement of the FERC language. Ms. McQuade explained that if a regulated entity followed the Commission approved standard it would be unnecessary for the entity to reapply for the exemption. Mr. Ulch stated that he does not disagree with any substantive part of the standard, but will vote against it as it is duplicative.

Mr. Castle made a motion to accept the entire recommendation including the minor modifications suggested by the WEQ Executive Committee. Mr. Rodriquez seconded the motion. The motion passed the required supermajority vote. [*Vote 1*].

4. Discussion and Review of Pending Recommendations

e-Tariff Recommendation and Attachment

Mr. Sappenfield reviewed the e-Tariff recommendation and attachment. He stated that this is a preview of discussions expected on February 29, 2008 joint EC meeting and that comments on the recommendation are due on February 27, 2008. He noted that all of the meetings were very well attended and that the recommendation was voted out of the subcommittee without opposition and few abstentions. Ms. Daly stated that several members of the WEQ had asked if they could vote in favor of the standard, contingent on certain issues being resolved. NAESB does not have conditional voting at either the subcommittee or EC level. To vote addressing conditions indicates that the conditions become part of the motion. Ms. Daly noted further that issues outside NAESB's scope can and should be included in comments to provide a record of such to the Commission. The request for conditional voting and its denial did not affect a vote on the recommendation at the subcommittee level.

Mr. Davis stated that he does not believe that two days will be enough time to review and address any new issues that will be presented in comments submitted at the last minute before the deadline. Mr. Sappenfield and Ms. Daly noted that it is unlikely that any issues not addressed at the subcommittee level will be included in comments to the Executive Committee. Ms. McQuade asked Mr. Sappenfield and Ms. Daly to characterize the comments they expect on the recommendation. Ms. Daly stated that she understands the issue presented by National Grid concerning joint and shared filing rights to be a major concern of several participants on the electric side, and that she expects comments on that issue. Ms. Davis noted that the issue is a FERC policy question and that comments submitted on the issue will be requesting a policy clarification rather than a modification to the standard.

Mr. Norris noted that the subcommittee worked very hard on the standard and given that there were no opposing votes at the subcommittee level, he feels comfortable that two days will be sufficient time to prepare for the Executive Committee meeting. Ms. York encouraged the participants to review the comments submitted as they are posted and noted that the Executive Committee meeting to vote on the standard is scheduled from 1:00 pm to 5:00 pm Central on February 29, 2008.

ESS/ITS/BPS Recommendations

Mr. Wood reviewed the status of the ATC/TTC Narrative and Load Forecast and Actual Peak Load standards that were originally scheduled to be complete and before the Executive Committee by this meeting. He stated that subcommittee is still addressing some of the conceptual issues regarding the Load Forecast and Actual Peak Load standard, but plan to vote the standard out of subcommittee by the end of the month. Mr. Pritchard noted that several comments were submitted in response to FERC Order No. 890-A and suggested that Executive Committee consider postponing subcommittee work on the issue until clarification is provided by FERC. Mr. Green stated that if the subcommittee were to wait on a final disposition from FERC on every issue, completing the FERC Order No. 890 work would be impossible. Ms. McQuade noted that NAESB has committed to FERC deadlines on certain FERC Order No. 890 items and that delaying any work is no longer an option should the subcommittee meet the deadlines. Mr. Gallagher stated that NAESB does not need to begin asking FERC for deadline extensions and supports doing what ever is necessary to ensure the subcommittee produces a good product by the deadline.

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Mr. Wood stated that the ESS/ITS/BPS has been working on the ATC/TTC Narrative standard since early December and is near completion. The subcommittee intends to review the standard and vote it out at the February 13, 2008 meeting. Ms. McQuade noted that timeline presented by Mr. Wood would put the subcommittee only two weeks behind the original schedule.

The participants briefly discussed whether two-day meetings would be necessary in the future. After discussion the Committee decided to allow the chair, co-chair, and Ms. McQuade to make the decision based upon the agenda. The meeting was recessed at 4:35 pm Central.

The meeting was reconvened at 9:00 am Central on February 5, 2008, and the participants were advised that the previous day's antitrust guidelines were still in effect.

5. Discussion, Consideration, and Vote to Adopt Minor Corrections

Version 1 Minor Corrections, Submitted by Mr. Skiba

Mr. Skiba reviewed the proposed minor corrections, included in the WEQ Executive Committee book, behind Tab 6, beginning on page 185. He stated that the minor corrections to Version 1 were submitted in an effort to make the existing business practices more consistent, as discussed at the WEQ Leadership meeting on December 12, 2007. Mr. Gallagher moved to adopt the minor corrections as submitted by Mr. Skiba. Mr. Schwermann seconded the motion, and the motion passed without opposition.

Minor Corrections for Final Action 2007 WEQ Annual Plan Item 2(ii), Submitted by Mr. Sorenson and Mr. Gilbert

Mr. Sorenson reviewed the proposed minor corrections submitted by OATI and Southern Company, included in the WEQ Executive Committee book, behind Tab 6, beginning on page 189. Mr. Sorenson stated that the minor corrections are to rectify an omission in a data element in WEQ-013-4.1.4 and to correct misnamed template in the example of WEQ-002-4.2.1.3. Mr. Rodriquez made a motion to accept the submitted minor corrections and Mr. Sorenson seconded. The motion passed without opposition.

Minor Corrections for Final Action 2007 Annual Plan Item 2(c), Submitted by Mr. Wood

Mr. Sorenson reviewed the proposed minor corrections submitted by Southern Company, included in the WEQ Executive Committee book, behind Tab 6, beginning on page 191. He stated that the corrections were to update WEQ-001 to reflect the changes of Order 890-A. Mr. Ulch made a motion to accept the minor corrections submitted by Southern Company and Mr. Schwermann seconded. The motion passed without opposition.

6. Update on Specific Issues

DSM/EE Efforts

Ms. McQuade provided an update of the DSM/EE activities. She stated that task groups are developing wholesale and retail matrices, a preamble, and a glossary. Currently the wholesale matrix is farther along than the retail, and the matrices will be used as a baseline for the standards. There has been state regulatory participation and the group intends to have at least a portion of the standards language completed by yearend. Ms. McQuade also noted that some of the early terminology issues are currently being addressed in the glossary group of the NAESB subcommittee and the preamble group is drafting the language to put the standards in context. Mr. Gallagher asked how the standards will be implemented. Ms. McQuade answered that the wholesale standards will be filed with FERC and that the retail standards will be given to NARUC to implemented by states who choose to do so Mr. Babik asked if the effort is being coordinated with NERC. Ms. McQuade stated that the standards we are developing address measurement and verification for demand response programs, and NERC is working on standards or data collection from a transmission planning perspective. While the efforts are complementary, they are not duplicative. Both NAESB and NERC are involved in each effort.

Version 1.0 Filing

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Ms. McQuade reviewed the sections and appendices of the Version 1.0 filing. She noted that the filing was drafted using the same format as WGQ filings. Mr. Webber stated that he would find it helpful if the version reference noted the date that Transmission Providers must incorporate the standard into their tariffs. Mr. Davis stated that NAESB should be cautious about providing a compliance date, because Order 698 required compliance without requiring tariff update. Ms. McQuade stated that sometimes FERC staggers the implementation dates, in which case all dates would have to be listed. Ms. McQuade stated that she would look into including the required implementation dates, which would be added after the filing takes place and after the FERC acts. As such, the dates could not be included in the filing, but would be added in a later work product.

7. Subcommittee and Plan Updates

Triage Subcommittee

Ms. McQuade reviewed the nine outstanding requests which need to be triaged. She noted there are two requests from 2007 to triage, R07019 and R07020, and seven received to date for 2008, R08001-R08007. The requests are included in the WEQ Executive Committee book, behind Tab 8, beginning on page 355. Mr. Rodriquez asked if R07019 and R07020 need to be handled through a joint coordination process with NERC, since R07020 is tied directly to balancing authority controls and R07019 touches on them. Mr. Schwermann stated that he is concerned that getting into joint coordination process with NERC for R07020 is unnecessary and that if NAESB gets involved with the request some definite boundaries should be established. Ms. McQuade stated that she does not see the need to enter into a joint development process with NERC for R07019, but the NERC and NAESB management should convene to determine how to proceed with R07020. Mr. Ulch stated that he agrees with Mr. Schwermann and understood the time control and inadvertent payback options to be strictly reliability issues.

Mr. Rodriquez stated that he understood that the request would be discussed at the February 6, 2008 Standards Review Subcommittee (SRS) meeting and that the SRS would make a final decision as to how to proceed with the request. He continued that he does not want to stall the NERC process because of resource concerns at NAESB. Ms. McQuade explained that the SRS will discuss the request and make a threshold determination as to whether there is a need for NAESB to address the request or if it is solely a reliability issue. Once that determination is made, should business practices be impacted, then NERC and NAESB executive management would determine the next steps, as described in the joint development process.

Order 890

Next, Mr. Skiba reviewed the Order 890 Workplan and the Order 890-A cross reference. These items are included in the WEQ Executive Committee book, behind Tab 7, beginning on page 204. Mr. Skiba also gave a presentation updating the Executive Committee on the status of the ESS/ITS/BPS Order 890 work. The presentation was included as a supplement to the WEQ Executive Committee book. It can be found through the following link: http://naesb.org/pdf3/weq_ec020408w9.ppt. The presentation outlined the Order 890 work completed to date, the Order 890 work still to be completed, and the meeting schedule through the filing deadline. He stated that he and the other co-chairs have expressed concern about meeting the filing deadline and are making modifications to the meeting structure so that Order 890 items will be addressed more efficiently. He stated that the co-chairs would like to receive guidance from the Executive Committee to ensure that the FERC deadlines are met.

Ms. York thanked Mr. Skiba and the other co-chairs of the ESS/ITS/BPS for putting the presentation together and bringing their concerns to the Executive Committee. Ms. York stated that she supports the meeting structure modifications made by the subcommittee. The chairs have the authority to run meetings avoiding inefficient use of time. Some of these measures include not revisiting decisions made as new participants join, not listening to duplicative positions and adhering to the agenda and its topics. Mr. Harshbarger asked about the process for making a change, once an issue has been established by a motion and vote. Ms. McQuade responded that a chair can call a new motion on the issue out of order, otherwise a motion to reconsider requires super-majority support. Mr. Rodriquez added that a motion to reconsider must be made a participant who originally supported the motion.

Mr. Gallagher stated that he is believes that the time allowed to get a job done, is the time that will be used. He suggested that the co-chairs enforce explicit time restraints during the meeting and use working groups to get

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multiple tasks done at the same time. Mr. Rodriquez stated that working groups are very important tool on the NERC side and account for 90% of what gets accomplished between meetings. Ms. Crockett stated that the WGQ does not post items for informal comment periods; rather they redline work papers and discuss their modifications during meetings. Mr. Saini stated that Order 890 is subject to multiple interpretations and when there are many participants advocating different interpretations, resolution of the various positions taken requires discussion and compromise. Ms. McQuade asked the group if soliciting FERC staff members to attend the meetings would be helpful. Mr. Green asked if it would be possible to have the Executive Committee identify the concept and direction for a standard before the subcommittee begins drafting the details. It was determined that NAESB would request FERC staff attendance on a case-by-case basis, after discussion with the subcommittee leadership. Of course, as the meetings are open, staff can attend any of the meetings. However, if it is advantageous to have staff in attendance in meetings depending on the topic, NAESB will make an outreach to request their participation.

After further discussion, the Executive Committee decided to create a work paper capturing the suggestions made by the members. This work paper can be found through the following link: http://naesb.org/pdf3/weq_ec020508a2.doc.

Electronic Scheduling Subcommittee/Information Technology Subcommittee (ESS/ITS)

Mr. Sorenson's update for ESS/ITS was given in the Order 890 as the group has been solely focused on Order 890.

Joint Interface Scheduling Working Group (JISWG)

Next, Mr. Harshbarger provided an update of the JISWG activities. He stated that the group developed the draft Electronic Registry Systems Requirement Document during the January 23, 2008 meeting. The document was put out for an informal comment period ending on March 14, 2008 and passed to the ESS/ITS for review. Mr. Harshbarger noted that group is also assembling a list of items to be included in e-Tag 1.8.1 and addressing a request for a market wide confidentiality agreement. Once the document is in a final state, it can be included as the specification for an RFP for moving the registry from NERC to NAESB – which will probably occur in March-April.

Business Practices Subcommittee (BPS)

The majority of the BPS work is focused on Order 890. Mr. Skiba gave a presentation updating the Executive Committee on the status of the BPS Transmission Loading Relief (TLR) work. The presentation was included as a supplement to the WEQ Executive Committee book. It can be found through the following link: http://naesb.org/pdf3/weq_ec020408w10.ppt. During the discussion, BPS has reviewed the NERC TLR Operator's Reference manual and prepared comments. It should go out for formal comment from NERC shortly. It was also noted that the other two phases now are underway – both focusing primarily on NERC activities rather than changes to NAESB standards. Phase 2 is addressing the market-flow field test for MISO, PJM and SPP. Phase 3 is addressing IRO-006-5 (to provide an Interconnection-wide transmission loading relief procedure for the Eastern Interconnection that can be used to prevent and/or manage potential or actual SOL and IROL violations to maintain reliability of the bulk electric system, applicable to Reliability Coordinators in the Eastern Interconnection). Mr. Skiba made a request for volunteers to address NAESB annual plan item 1d – which addresses a determination of a future path for TLR including consideration of alternative congestion management procedures, and made a similar request for volunteers from the western interconnect to discuss impact of TLR on interconnections.

SRS

Mr. Skiba gave a presentation updating the Executive Committee on the status of the SRS activity. This presentation was included as a supplement to the WEQ Executive Committee book and can be found through the following link: http://naesb.org/pdf3/weq_ec020408w8.ppt. Mr. Skiba stated that the SRS identified that the NERC Balancing Authority Controls standards may impact existing NAESB standards. He noted that the SRS will follow the joint development procedure and refer such to NERC and NAESB executive management to determine the next steps. Mr. Rodriquez added that the chair of the NERC Balancing Authority Controls Drafting Team will be in attendance at the next SRS meeting to discuss the request and reach a conclusion on whether NAESB standards will be impacted. Ms. McQuade stated that having a NERC chair at the SRS meeting should be very helpful, so that the

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direction of the NERC standard can be identified and the NERC and NAESB executive management can make the threshold decision as to whether there is a need for joint development.

Next, Mr. Skiba reviewed the status of request R05026 submitted by Calpine. He stated that at the May 8, 2007 Executive Committee meeting three requests, R05026c, R05026g, and R05026i, were identified as requiring more detail before the Committee could address their scope. He noted that Calpine has not responded to the Committee's request for clarification. Ms. Kennedy confirmed that Calpine has not responded to NAESB. Mr. Schwermann made a motion to close requests R05026c, R05026g, and R05026i. Mr. Skiba seconded the motion. Ms McQuade noted that a simple majority vote would be needed as the motion was to maintain the status quo. The motion passed without opposition.

8. Board of Directors, Board Committee and Regulatory Updates

Ms. McQuade briefly summarized December 13, 2007 Board of Directors meeting in Houston, Texas. The minutes from the board meeting have been included in the WEQ EC book under tab 10, and beginning on page 414. Ms. McQuade did note that the Board approved the continued existence of the two retail quadrants, while the retail quadrant structure committee considered other actions. Ms. Crockett provided an update of the Order 698 activity. She noted that the WGQ BPS voted out a single standard to address the request for redirects once through a point of constraint and that the subcommittee is coming to consensus on a group of standards to allow index-based pricing for capacity release. She stated that the Board was informed of the possibility of a segment block at the WGQ EC level concerning the proposed changes to the nomination timeline, and that many letters from various state commissioners have been submitted urging the subcommittee to find a solution to better coordinate the electric and gas markets. The Board created an ad hoc committee to provide guidance on segment blocks and standards development efficiency. Ms. McQuade urged those who would like to see flexibility added to the gas day infrastructure to participate in the Order 698 meetings.

9. New Business

No new business was discussed.

10. Adjourn

The meeting adjourned at 2:35 PM Central.

11. Executive Committee Attendance and Voting Record[1i] (Vacancies not shown on the table)

		SUB-SEGMENT	FEB 4TH	FEB 5TH	VOTE 1
TRANSMISSION SEGMENT					
Patrick McGovern	Georgia Transmission Corporation	Muni/Coop	Phone	In Person	S
Wendy Weathers Alt. for Steve Cobb	Tennessee Valley Authority	Fed/State/Prov.	In Person	In Person	S
Dean Ulch	Southern Company Services	IOU	In Person	In Person	O
Edward Davis	Entergy Services, Inc.	IOU	In Person	In Person	S
Julie Voeck	American Transmission Company	ITC	Absent	Absent	
Bob Harshbarger	Puget Sound Energy	at large	In Person	In Person	S
Michael Wells	WECC	At-Large	Absent	In Person	S
GENERATION SEGMENT					
William J. Gallagher	Vermont Public Power Supply Authority	Muni/Coop	In Person	In Person	S
Kathy York	Tennessee Valley Authority	Fed/State/Prov.	In Person	In Person	S
Jalal Babik	Dominion Resource Services, Inc.	IOU	In Person	Absent	S
John Ciza	Southern Company Services	IOU	Absent	Absent	
Gary Hinners	Reliant Energy, Inc.	at large	Absent	Absent	
Neal Balu	Integrys Energy Services, Inc.	at large	Absent	Absent	
MARKETER/BROKERS SEGMENT					
Clay A. Norris	North Carolina Municipal Power Agency #1	Muni/Coop	Phone	Phone	S
Valerie Crockett Alt. for C. Harmon	Tennessee Valley Authority	Fed/State/Prov.	In Person	In Person	S
Ralph Honeycutt	SUEZ Energy Marketing NA, Inc.	Not IOU Affiliated	Absent	Absent	
Mark Mitchell	Salt River Project	at large	Absent	Absent	
John Apperson	PacifiCorp Energy	IOU	Absent	Absent	
Barry Green	Electric Power Supply Association	at large	In Person	In Person	S
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT					
Robert Williams	Florida Municipal Power Agency	Muni/Coop	Absent	Absent	
Robert Schwermann	Sacramento Municipal Utility District	Muni/Coop	In Person	In Person	S
Alan Pritchard	Duke Energy Corporation	IOU	In Person	In Person	S
Jeffrey C. Mueller	Public Service Electric and Gas Company	IOU	Absent	Absent	
Robert Martinko	FirstEnergy Service Company	at large	Phone	Phone	S

[1] Voting Record Legend: S = Support; O = Oppose; A = Abstain; B = Notational Ballot

		SUB-SEGMENT	FEB 4TH	FEB 5TH	VOTE 1
Syd Berwager	Bonneville Power Administration/Power Business Line	Other	Phone	Phone	S
Andy Rodriquez	NERC	At-Large	In Person	In Person	S
END USERS SEGMENT					
Lou Ann Westerfield	National Association of Regulatory Utility Commissioners	Regulator	Absent	Absent	
Paul Sorenson	Open Access Technology International, Inc.	At-Large	In Person	In Person	S
Independent Grid Operator/Planners					
Stu Bresler	PJM Interconnection		Phone	Phone	S
Jim Castle	New York Independent System Operator, Inc.		Phone	Phone	S
Cheryl Mendrala Alt. for M. Goldberg	ISO New England, Inc.		Phone	Phone	S
Steve Greenleaf	California ISO		Phone	Phone	S
Bill Blevins, Alt. for J. Mickey	ERCOT		Phone	Phone	S
Larry Middleton	Midwest Independent Transmission System Operator		Phone	Phone	S
Diana Pommen Alt. for Charles Yeung	Southwest Power Pool		Phone	Phone	S

12. Additional Attendance

Name	Organization	Feb 4th	Feb 5th
Jonathan Booe	NAESB	In Person	In Person
Christopher Burden	Williams Gas Pipeline	Phone	
Jane Daly	Arizona Public Service	Phone	
David Huffman	NAESB	In Person	In Person
Marie Knox	Midwest ISO	Phone	
Shay LaBray	Pacificorp Transmission	In Person	In Person
Bill Lohrman	FERC	Phone	Phone
Lou Oberski	Dominion	Phone	Phone
Marcie Otondo	Arizona Public Service		Phone
Marjorie Perlman	Energy East	Phone	Phone
Susan Pollonais	FERC	Phone	Phone
Denise Rager	NAESB	In Person	In Person
Barbara Rehman	Bonnville Power Administration	Phone	Phone
Narinder Saini	Entergy	In Person	Phone
Ed Skiba	Midwest ISO		In Person
Veronica Thomason	NAESB	In Person	In Person

Name	Organization	Feb 4th	Feb 5th
Brian Weber	Pacificorp Transmission	In Person	In Person
JT Wood	Southern Company	Phone	Phone

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March 5, 2008

TO: NAESB Wholesale Electric Quadrant and Wholesale Gas Quadrant Executive Committee and Interested Industry Participants

FROM: Cory Galik, Meeting Administration/Project Manager

RE: WGQ and WEQ Executive Committee Meeting Draft Minutes – February 29, 2008

NORTH AMERICAN ENERGY STANDARDS BOARD EXECUTIVE COMMITTEE MEETING
WHOLESALE ELECTRIC QUADRANT (WEQ)
WHOLESALE GAS QUADRANT (WGQ)
February 29, 2008 – 1:00 pm to 4:00 pm Central
Hosted by NAESB – Houston, Texas
DRAFT MINUTES

1. Welcome

Mr. Buccigross opened the meeting and welcomed the meeting participants in the room and on the phone. Ms. Galik read the antitrust guidelines. Ms. Galik called the roster of the WEQ and WGQ Executive Committee members and alternates. Quorum was established.

The Executive Committees reviewed the draft agenda. Ms. Van Pelt moved to adopt the agenda. Ms. Davis seconded the motion. The motion passed without opposition.

2. Consideration of recommendations for standards, comments submitted, and vote on:

The WGQ and WEQ Executive Committees reviewed the e-Tariff recommendation and the e-Tariff recommendation attachment. Several comments were submitted on this recommendation, including comments from the e-Tariff chairs, Spectra Energy, AOPL, Dominion, EEI, ISO Group, ISO New England Inc, New England Participating Transmission Owners, and PJM.

Mr. Sappenfield presented the comments submitted. He began with the comment submitted by Ms. McCain of Spectra Energy. She proposed to make the usage conditional based on the type of filing and required when the attachment document is provided. Mr. Burden stated that the wording change was to simplify the standard. This modification was made to the recommendation.

The next set of comments addressed by Mr. Sappenfield was submitted by the chairs to recognize issues identified during their discussions. They were not discussed in detail during the meeting.

Mr. Sappenfield then addressed New England ISO and New England Participating Transmission Owners, which intended to support the comment of the ISO. These comments dealt with issues of shared filing rights and e-Tariff. The intention of these comments was to put these concerns on record for the FERC.

PJM Interconnection LLC submitted comments supporting filing electronically rather than manually but had some concern with joint shared filings. They suggested modifying or eliminating Order 614.

ISO Group Comments were submitted on behalf of New York ISO, Midwest ISO, California ISO, Southwest Power Pool and PM Interconnection. They were concerned with the additional administrative burden of requiring ISOs and RTOs to provide multiple metadata points with each tariff filing. There were other issues that need to be addressed prior to implementation, including timing of baseline filings, granularity of filed tariff sections and Order 614 reformation of headers and footers.

Mr. Sappenfield addressed the comment submitted by EEI. The comment stated that there is a simpler alternative to the standards proposed and that this is an issue for FERC to address.

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The Association of Oil Pipelines comment suggested that FERC be the repository of regulation instead of NAESB because oil pipelines are not a part of NAESB. They also want to ensure that there is adequate time between the finalization of the rule and implementation to allow time for testing, especially software. They conclude that there appears to be a workable solution.

The last comment discussed by Mr. Sappenfield was from Dominion. Their two concerns were dealing with record management and business impact.

Ms. Van Pelt moved, seconded by Ms. Burch, to adopt the entire recommendation with the modifications made during the meeting. There were not enough votes cast to determine whether the vote garnered the required votes to pass a super majority vote. A notational ballot will be distributed to the WEQ and WGQ Executive Committee members and alternates who did not cast a vote. The revised documents are posted as attachments to these minutes:

> Attachment to e-Tariff Recommendation as revised and adopted by the WGQ/WEQ Executive Committees February 29, 2008 (redline).
>
> Attachment to e-Tariff Recommendation as revised and adopted by the WGQ/WEQ Executive Committees February 29, 2008 (clean).

The notational ballot period conclusion should provide a definitive response on whether the motion passes a super-majority of each quadrant. If the motion passes, which is likely, then the ratification period begins. Ratification is a 30-day process where each member of the two quadrants has the opportunity to cast a vote to ratify the EC actions. For members returning ratification ballots, 67% of those returned ballots should be in the affirmative for the standards to be considered ratified. *[This threshold was reported in error at the meeting. It was indicated at the meeting that the threshold was 90% instead of 67% – the 90% threshold pertains to ratification of Board actions that result in changes to the certificate of NAESB]*.

3. New Business

There was no new business to discuss.

4. Adjourn

The meeting adjourned at 2:06 PM Central.

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5. Executive Committee Attendance and Voting Record

Wholesale Gas Quadrant Executive Committee Voting Record – February 29, 2008 – With Notational Ballots Received by March 4, 2008

PRODUCERS SEGMENT		PRESENT	BALLOT	VOTE
Rhonda Denton for Jim Busch	BP Energy Company	Phone		Yes
Pete Frost	ConocoPhillips Gas and Power Marketing		Submitted	Yes - NB
Chuck Cook	ChevronTexaco			Yes - NB
Richard Smith	ExxonMobil Gas & Power Marketing	In Person		Yes
Mike Shepard	Mewbourne Oil Company	Phone		Yes
PIPELINE SEGMENT		**PRESENT**	**BALLOT**	**VOTE**
Iris King for Bill Griffith	Dominion Transmission	Phone		Yes
Kathryn Burch	Spectra Energy Transmission	In Person		Yes
Dale Davis	Williams Gas Pipeline	In Person		Yes
Randy Young	Gulf South Pipeline	Phone		Yes
Kim Van Pelt	Panhandle Eastern Pipe Line	In Person		Yes
LOCAL DISTRIBUTION COMPANY (LDC) SEGMENT		**PRESENT**	**BALLOT**	**VOTE**
Rick Ishikawa for Rodger Schwecke	Southern California Gas	Phone		Yes
Marjorie Perlman for Dolores Chezar	Energy east Management Company	Phone		Abstain
Jim Blasiak for Paul Buckley	Washington Gas	Phone		Yes
Mike Novak	National Fuel Gas Distribution	Phone		Yes
Craig Colombo	Dominion Resources	Phone		Yes
END USERS SEGMENT		**PRESENT**	**BALLOT**	**VOTE**
Kelly Daly	Arizona Public Service Company		Submitted	Yes - NB
Valerie Crockett	Tennessee Valley Authority		Submitted	Yes - NB
Lori Lynn Pennock for Paul A. Jones	Salt River Project		Submitted	Yes - NB
Dona Gussow	Florida Power and Light	Phone		Abstain
Tina Burnett	The Boeing Company		Submitted	Yes - NB
SERVICES SEGMENT		**PRESENT**	**BALLOT**	**VOTE**
Suzanne Calcagno	UBS Energy LLC			
Lisa Simpkins	Constellation Energy Commodities Group			
Leigh Spangler	Latitude Technologies	Phone		Yes
Jim Buccigross	8760 Inc.	In Person		Yes
Keith Sappenfield	EnCana Marketing (USA) Inc.	In Person		Yes

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Wholesale Electric Quadrant Executive Committee Voting Record – February 29, 2008 – With Notational Ballots Received by March 4, 2008

TRANSMISSION SEGMENT		SUBSEGMENT	PRESENT	BALLOT	VOTE
Patrick McGovern	Georgia Transmission Corporation	Muni/Coop		Submitted	Abstain
Jane Daly for S. Cobb	Arizona Public Service	Fed/State/Prov	In Person		Yes
Dean Ulch	Southern Company Services	IOU	Phone		Yes
N. Saini for E. Davis	Entergy Services, Inc.	IOU	Phone		Yes
Julie Voeck	American Transmission Company	ITC		Submitted	Abstain - NB
Bob Harshbarger	Puget Sound Energy	at large	Phone		Yes
Michael Wells	WECC	At-Large	Phone		Yes
GENERATION SEGMENT			**PRESENT**	**BALLOT**	**VOTE**
William J. Gallagher	Vermont Public Power Supply Authority	Muni/Coop	Phone		Yes
Kathy York	Tennessee Valley Authority	Fed/State/Prov.	Phone		Yes
Jalal Babik	Dominion Resource Services, Inc.	IOU		Submitted	Yes - NB
John Ciza	Southern Company Services	IOU		Submitted	Yes - NB
V A C A N C Y		Merchant			
Gary Hinners	Reliant Energy, Inc.	at large	In Person		Yes
Neal Balu	Integrys Energy Services, Inc.	at large			
MARKETERS/BROKERS SEGMENT			**PRESENT**	**BALLOT**	**VOTE**
Clay A. Norris	North Carolina Municipal Power Agency	Muni/Coop	Phone		Yes
Clyde Harmon	Tennessee Valley Authority	Fed/State/Prov.		Submitted	Yes - NB
Ralph Honeycutt	SUEZ Energy Marketing NA, Inc.	NIOU Aff.			
Mark Mitchell	Salt River Project	at large		Submitted	Yes - NB
John Apperson	PacifiCorp Energy	IOU		Submitted	Yes - NB
V A C A N C Y		IOU			
Barry Green	Electric Power Supply Association	at large	Phone		Yes
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT		**SUBSEGMENT:**	**PRESENT**	**BALLOT**	**VOTE**
Robert Williams	Florida Municipal Power Agency	Muni/Coop			
Robert Schwermann	Sacramento Municipal Utility District	Muni/Coop		Submitted	Yes - NB
Alan Pritchard	Duke Energy Corporation	IOU	Phone		Abstain
Jeffrey C. Mueller	Public Service Electric and Gas Company	IOU	Phone		Yes
Robert Martinko	FirstEnergy Service Company	at large	Phone		Yes
Syd Berwager	Bonneville Power Administration	Other		Submitted	Yes - NB
Andy Rodriquez	NERC	At-Large	Phone	Submitted	Yes - NB

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Wholesale Electric Quadrant Executive Committee Voting Record – February 29, 2008 – With Notational Ballots Received by March 4, 2008

END USERS SEGMENT			PRESENT	BALLOT	VOTE
V A C A N C Y		at large			
V A C A N C Y		at large			
Lou Ann Westerfield	Idaho Public Utilities Commission	Regulator		Submitted	Yes
V A C A N C Y		at large			
V A C A N C Y		at large			
V A C A N C Y		Large Industrial			
Paul Sorenson	Open Access Technology International, Inc.	At-Large		Submitted	Yes - NB
INDEPENDENT GRID OPERATORS/PLANNERS			**PRESENT**	**BALLOT**	**VOTE**
Stu Bresler	PJM Interconnection		Phone		Yes
Jim Castle	New York Independent System Operator, Inc.		Phone		Yes
Matt Goldberg	ISO New England, Inc.			Submitted	Yes - NB
Steve Greenleaf	California ISO		Phone		Yes
Diane Pommen for Joel Mickey	Alberta Electric System Operator		Phone		Yes
Larry Middleton	Midwest Independent Transmission System Operator		Phone		Yes
Charles Yeung	Southwest Power Pool		Phone		Yes

Notes:

- The votes indicated by the highlighted yellow ballots are not counted in the tally as the recommendation was modified after the ballot was received. All submitters were contacted via email and phone to inform them that the ballots would require re-submittal because of the modification to the recommendation.
- The WGQ EC passed the modified recommendation with all segments reaching the 40% threshold and the 67% quadrant threshold. The WGQ EC had 21 out of a possible 25 votes (84%) in favor. No negative votes were cast.
- The WEQ EC passed the modified recommendation with all segments reaching the 40% threshold and the 67% quadrant threshold. The WEQ EC had 28 out of a possible 35 votes (80%) in favor. No negative votes were cast.
- In the voting column, a blank indicates that the EC member did not attend, return a ballot prior to the meeting, or return a ballot after the meeting. In the voting column, the designation "NB" indicated that the result was provided via a notational ballot.
- A vote of "Abstain" in the voting column has the same effect as a negative vote and contributes as such to the overall result, but the submitter is casting a vote that is neither in support nor in opposition.

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6. Other Participant Attendance

Name	Organization	Attendance (Phone/In Person)
Chris Advena	PJM Interconnection, LLC	Phone
Jonathan Booe	NAESB	In Person
Louise Bradford	Trunkline Gas Company	In Person
Christopher Burden	Williams Gas Pipeline	In Person
Linda Farquhar	Great Lakes Gas Transmission Co.	Phone
Cory Galik	NAESB	In Person
Michael Goldenberg	FERC	In Person
Angela Gonzales	NAESB	Phone
Maureen Hamilton	Sea Robin Pipeline Co.	In Person
Erich Hunt	Pacific Gas and Electric Co.	Phone
Richard Kruse	Spectra Energy Transmission	In Person
Marcy McCain	Spectra Energy Transmission	In Person
Rae McQuade	NAESB	In Person
Molly Nagle	Southern Natural	In Person
Don Petersen	Pacific Gas and Electric Co.	Phone
Keith Pierce	FERC	Phone
Mark Pierce	Spectra Energy Transmission	In Person
Denise Rager	NAESB	In Person
Ed Skiba	Midwest ISO	Phone
Veronica Thomason	NAESB	In Person
Wendy Weathers	Salt River Project	Phone
JT Wood	Southern Company	Phone

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April 9, 2008

TO: NAESB Wholesale Electric Quadrant Executive Committee and Interested Industry Participants

FROM: Cory Galik, Meeting Administration/Project Manager

RE: WEQ Executive Committee Meeting Draft Minutes – April 9, 2008

NORTH AMERICAN ENERGY STANDARDS BOARD
EXECUTIVE COMMITTEE CONFERENCE CALL -- WHOLESALE ELECTRIC QUADRANT (WEQ)
April 9, 2008 – 10:00 am to 4:00 pm Central
Hosted by NAESB – Houston, Texas
DRAFT MINUTES

1. Welcome

Ms. York opened the meeting and welcomed the meeting participants on the phone. Ms. Galik read the antitrust guidelines. Ms. McQuade called the roster of the WEQ Executive Committee members and alternates. Quorum was established. The Executive Committee reviewed the draft agenda. Mr. Pritchard moved to adopt the agenda and Ms. Crockett seconded the motion. The motion passed without opposition. Ms. York reminded everyone that this call had been set up specifically as a one-topic call – ATC Narratives.

2. Consideration of recommendations for standards, comments submitted, and vote on:

Mr. Wood summarized the ATC Narrative recommendation. He highlighted its purpose and the types of changes to existing standards and new standards created to support ATC Narratives as part of the Order no. 890 effort. Much of the discussion is not repeated here but can been reviewed both in the comments themselves and in the review session held on April 2.

The majority of the time spent in the call was allotted to review of six sets of comments: EPSA, Southern Company, Midwest ISO, NAESB WEQ Standards Review Subcommittee, PJM and BPA. Each set of comments were reviewed individually before proceeding to vote on the recommendation and entertain changes to the motion to adopt the recommendation. Mr. Green reviewed the comments submitted by EPSA. The four points made in the comments had been addressed in subcommittee. The goal of the comments was to provide the transparency intended by FERC Order No. 890. The comments from Southern Company were addressed by Mr. Wood. Not all of the comments had been addressed in the subcommittee – specifically the error in the length of one of the data elements. Mr. Harmon then addressed Midwest ISO's comments. The seasonality was not discussed in subcommittee but he comments on applicability to firm and non-firm service was discussed. After discussion, MISO indicated that the proposed changes regarding seasonality were not needed. NAESB Standards Review Subcommittee submitted comments were reviewed by Mr. Skiba. The comments addressed grammatical changes and removing requirements stated in WEQ 001 to avoid having multiple listings of standards. PJM's comments were reviewed by Mr. Bresler. Mr. Bresler noted that his comments had been addressed in the subcommittee. The comments from BPA were addressed by Mr. Berwager. He noted that the comments had been addressed in the subcommittee.

As can be seen from the above notes, the majority of the comments were addressed in the subcommittee meetings. The comments however, are submitted as part of the formal comment period to ensure that they become part of the record forwarded to the FERC.

A break was taken after the review of the comments for lunch. Upon return to the meeting, .Mr. Schwermann moved, seconded by Mr. Gallagher, to adopt the recommendation. Mr. Pritchard moved for a friendly amendment to adopt the recommendations of the NAESB Standards Review Subcommittee, which was accepted by Mr. Schwermann and Mr. Gallagher. Ms. Rehman made a friendly amendment to accept Southern Company's change to

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WEQ 003 (SYSTEM_ATTRIBUTE length of 15 changed to 25) which was accepted by Mr. Schwermann and Mr. Gallagher. Both of these set of changes were administrative in nature to correct errors in the recommendation.

For proposed amendments to the main motion, several considerations were made, none successful. The full set of motions and results can be found via the following link: http://www.naesb.org/pdf3/weq_ec040908a3.doc For a snapshot of the actions taken, Mr. Green proposed four motions to amend the main motion to address EPSA's comments. Mr. Skiba also made a motion to address part of MISO's comments.

The five motions are shown as such:

1. Mr. Green moved, and Mr. Sorenson seconded, to modify Standard Z.1.1 to remove the phrase "the transmission providers" and replace with "any underlying". The vote was 13 against and 2 in favor and failed to garner a simple majority to amend the main motion.
2. Mr. Green moved, seconded by Mr. Berwager, to modify Standard Z.1.2 from five days to two days. The vote was 10 against and 9 in favor and failed to garner a simple majority to amend the main motion.
3. The third motion made by Mr. Green to modify Standards Z.1.3 to make material updates available with links to original ATC change narratives failed to get a second.
4. Mr. Green's fourth motion to modify Standard Z.2.2 to reflect individual path changes also failed to get a second.
5. Mr. Skiba moved, seconded by Mr. Womack, to modify Y.1.1(c) to add "This requirement shall only apply if the Transmission Provider posts yearly ATC values." The vote was 10 against and 8 in favor and failed to garner a simple majority to amend the main motion.

The vote on the main motion and friendly amendments was then call. There were not enough votes cast during the call to reach a super majority threshold. A notational ballot will be distributed to the WEQ Executive Committee members who did not cast a vote. The revised recommendations can be accessed via the following links:

> Recommendation for 2008 WEQ Annual Plan Item 2.b.v.3 and 2008 WEQ Annual Plan Item 2.a.i.3 - ATC/TTC Narratives – as Revised by the WEQ EC on April 9, 2008 - Redlined
>
> Recommendation for 2008 WEQ Annual Plan Item 2.b.v.3 and 2008 WEQ Annual Plan Item 2.a.i.3 – ATC/TTC Narratives – as Revised by the WEQ EC on April 9, 2008 - Clean

The notational ballot period conclusion should provide a definitive response on whether the motion passes a super-majority of each quadrant. If the motion passes, which is likely, then the ratification period begins. Ratification is a 30-day process where each member of the two quadrants has the opportunity to cast a vote to ratify the EC actions. For members returning ratification ballots, 67% of those returned ballots should be in the affirmative for the standards to be considered ratified.

3. New Business

There was no new business to discuss. All were urged to attend the upcoming review session on ATC Information Links, and were reminded of the other 2 EC calls scheduled to address and vote on recommendations for Load Forecasts and for ATC Information Links.

4. Adjourn

The meeting adjourned at 1:52 PM Central.

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5. NAESB 2008 WEQ EXECUTIVE COMMITTEE VOTING RECORD – APRIL 9, 2008

TRANSMISSION SEGMENT (71% affirmative)		**SUBSEGMENT:**	**VOTE**
Patrick McGovern	Georgia Transmission Corporation	Muni/Coop	Y (Ballot)
Wendy Weathers for Steven C. Cobb	Salt River Project	Fed/State/Prov.	Y
Dean Ulch	Southern Company Services	IOU	Y
Edward Davis	Entergy Services, Inc.	IOU	Y
Julie Voeck	American Transmission Company	ITC	
Bob Harshbarger	Puget Sound Energy	at large	
Michael Wells	WECC	At-Large	Y (Ballot)
GENERATION SEGMENT (83% affirmative)			
William J. Gallagher	Vermont Public Power Supply Authority	Muni/Coop	Y
Kathy York	Tennessee Valley Authority	Fed/State/Prov.	Y
Jalal Babik	Dominion Resource Services, Inc.	IOU	Y (Ballot)
John Ciza	Southern Company Services	IOU	Y (Ballot)
Gary Hinners	Reliant Energy, Inc.	at large	
Neal Balu	Integrys Energy Services, Inc.	at large	Y
MARKETERS/BROKERS SEGMENT (50% affirmative)			
Clay A. Norris	North Carolina Municipal Power Agency #1	Muni/Coop	Y
Valerie Crockett for Clyde Harmon	Tennessee Valley Authority	Fed/State/Prov.	Y
Ralph Honeycutt	SUEZ Energy Marketing NA, Inc.	Not IOU Affiliated	N (Ballot)
Mark Mitchell	Salt River Project	at large	
John Apperson	PacifiCorp Energy	IOU	Y (Ballot)
Barry Green	Electric Power Supply Association (EPSA)	at large	N
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT (86% affirmative)			
Robert Williams	Florida Municipal Power Agency	Muni/Coop	Y
Robert Schwermann	Sacramento Municipal Utility District	Muni/Coop	Y
Alan Pritchard	Duke Energy Corporation	IOU	Y
Jeffrey C. Mueller	Public Service Electric and Gas Company	IOU	Y (Ballot)
Robert Martinko	FirstEnergy Service Company	at large	Y (Ballot)
Syd Berwager	Bonneville Power Administration	Other	Y
Andy Rodriquez	NERC	At-Large	

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5. NAESB 2008 WEQ EXECUTIVE COMMITTEE VOTING RECORD – APRIL 9, 2008

END USERS SEGMENT (50% affirmative)			
Lou Ann Westerfield	National Association of Regulatory Utility Commissioners	Regulator	
Paul Sorenson	Open Access Technology International, Inc.	At-Large	Y
INDEPENDENT GRID OPERATORS/PLANNERS (86% affirmative)			
Stu Bresler	PJM Interconnection		Y
Jim Castle	New York Independent System Operator, Inc.		Y
Matt Goldberg	ISO New England, Inc.		Y (Ballot)
Steve Greenleaf	California ISO		
Bill Blevins for Joel Mickey	Electric Reliability Council of Texas		Y (Ballot)
Ed Skiba for Larry Middleton	Midwest Independent Transmission System Operator		Y
Jimmy Womack for Charles Yeung	Southwest Power Pool		Y
VOTE RESULTS		Affirmative (74%)	26
		Opposing (6%)	2
		Abstentions (0%)	0
		Not Voting (20%)	7
		Total	35

Notes:

- In the voting column, a blank indicates that the EC member did not attend, return a ballot prior to the meeting, or return a ballot after the meeting.
- A vote of "Abstain" in the voting column has the same effect as a negative vote and contributes as such to the overall result, but the submitter is casting a vote that is neither in support nor in opposition.
- After the notational ballots were counted, the vote met the threshold of 67% overall affirmative vote and 40% minimum affirmative vote per segment.

6. Participant Attendance

Name	Organization	Attendance
Neal Balu	Integrys Energy	Phone
Kevin Bates	SPP	Phone
Stephen Bennett	Exelon Power Team	Phone
Syd Berwager	BPA	Phone
Stu Bresler	PJM	Phone
Jack Cashin	EPSA	Phone
Jim Castle	NYISO	Phone
Valerie Crockett	TVA	Phone

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Name	Organization	Attendance
Ed Davis	Entergy	Phone
Cory Galik	NAESB	In Person
Bill Gallagher	Vermont Public Power Supply Authority	Phone
Barry Green	EPSA	Phone
Steve Greenleaf	CAISO	Phone
John Harmon	Midwest ISO	Phone
Daryl McGee	Southern Company	Phone
Rae McQuade	NAESB	In Person
Ron Mucci	Entegra	Phone
Clay Norris	North Carolina Municipal Power Agency	Phone
Marcie Otondo	APS	Phone
Alan Pritchard	Duke Energy	Phone
Barbara Rehman	BPA	Phone
Narinder Saini	Entergy	Phone
Bob Schwermann	SMUD	Phone
Ed Skiba	Midwest ISO	Phone
Paul Sorenson	OATI	Phone
Dean Ulch	Southern	Phone
Wendy Weathers	SRP	Phone
Don Williams	PJM	Phone
Robert Williams	Florida Municipal Power Agency	Phone
Jimmy Womack	SPP	Phone
JT Wood	Southern Company	Phone
Kathy York	TVA	Phone

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April 18, 2008

TO: NAESB Wholesale Electric Quadrant Executive Committee and Interested Industry Participants

FROM: Jonathan Booe, Meeting Administration/Project Manager

RE: WEQ Executive Committee Meeting Draft Minutes – April 18, 2008

NORTH AMERICAN ENERGY STANDARDS BOARD
EXECUTIVE COMMITTEE CONFERENCE CALL -- WHOLESALE ELECTRIC QUADRANT (WEQ)
April 18, 2008 – 10:00 am to 4:00 pm Central
Hosted by NAESB – Houston, Texas
DRAFT MINUTES

1. Welcome

Mr. Norris opened the meeting and welcomed the meeting participants on the phone. Mr. Booe read the antitrust guidelines. Ms. McQuade called the roster of the WEQ Executive Committee members and alternates. Quorum was established. The Executive Committee reviewed the draft agenda. The agenda was adopted by consensus. Mr. Norris stated that he is going to streamline the meeting by asking for amendments to the recommendation rather then reviewing and responding to all of the formal comments. As all the commenters are on the call, they are more than welcome to discuss their comments as part of the motions to be made. With this approach and the transcripts taken for the meeting, the documentation should provide for a record of decisions made.

2. Consideration of recommendations for standards, comments submitted, and vote on:

Mr. Wood suggested that a motion be made to adopt the recommendation Recommendation for 2008 WEQ Annual Plan Item 2.a.i.4, 2.b.v.4 and 2.b.v.5 - Load Forecast and Actual Load Business Practice Standards associated with S&CP changes on behalf of the NAESB WEQ ESS/ITS and BPS subcommittee. As such, Mr. Ulch made a motion to adopt the recommendation submitted by the NAESB WEQ ESS/ITS/BPS Subcommittee on Request No. 2008 2.a.i.4, 2.b.v.4, 2.b.v.5 – Load Forecast and Actual Load Business Practice Standards associated with S&CP changes. Mr. Gallagher seconded the motion and Mr. Norris opened the floor for discussion.

Mr. Harshbarger initiated discussion by requesting, as a friendly amendment, that the Actual Daily System-Wide Peak Load be posted in megawatt hours (MWh) rather than megawatts (MW) in standards 001-n.1.1 and 001-n.1.2. Mr. Yeung seconded the friendly amendment. Mr. Gallagher and Mr. Ulch explained that based upon the industry practice for metering and the context of the standard, megawatts is the proper measurement. After further discussion on the clarity of the standards drafted, Mr. Harshbarger agreed to withdraw his friendly amendment, given that the abbreviation MW is only included for the term megawatt, rather than integrated clock-hour megawatt.

Mr. Sorenson offered a friendly amendment to change all instances of the OASIS Data Elements SYSTEM_LOAD_FORECAST to SYSTEM_FORECASTED_LOAD, NATIVE_LOAD_FORECAST to NATIVE_FORECASTED_LOAD, and ZONE_LOAD_FORECAST to ZONE_FORECASTED_LOAD. He stated that the modification would consistently order the OASIS Data Elements for actual and forecasted load. Mr. Ulch and Mr. Gallagher accepted the amendment.

Mr. Saini noted that MWh is used in 001-n.3.1 and offered a friendly amendment to replace the measurement with MW for reasons previously discussed. Mr. Ulch and Mr. Gallagher accepted the amendment.

Ms. Weathers stated that she would like to offer the three friendly amendments addressed as minor corrections in the Comments Submitted by W. Weathers, SRP. Ms. Weathers explained that the first amendment is to replace the terms “Actual Daily Native Load” and “Forecasted Daily Native Load” with the terms “Actual Daily Native Peak Load” and “Forecasted Daily Native Peak Load” throughout the proposed standards. She stated that modification

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will make the terms more clear. The second and third amendments are grammatical corrections. Mr. Wood stated that he supports the amendments. Mr. Ulch and Mr. Gallagher accepted the amendments.

Mr. Berwager stated that Bonneville Power Administration would like to make a motion to amend 001-n.6.5 by adding the proposed language captured in the Comments Submitted by B. Rehman, BPA. Mr. Harshbarger seconded the motion. The participants reviewed the proposed language, and Ms. Rehman explained that the addition makes clear that assumptions for long term ATC may differ from assumptions for short term ATC. The motion passed a simple majority vote without opposition.

Mr. Green stated that he too would like to make a motion to modify 001-n.6.5, and that his proposed modification does not have any bearing on the BPA language added to the recommendation but the BPA language could certainly be accommodated within his suggested changes. He stated that his modification addresses an issue discussed at length by the subcommittee and that the issue was a contributing factor to recommendations failure at the February 27, 2008 subcommittee meeting. Mr. Green made a motion that the last sentence of 001-n.6.5 be struck and the following language be added:

> In addition to the above, the Transmission Provider shall post the actual values for all weather-related data used to prepare each daily forecast. If such actual weather-related data is deemed to be commercially sensitive pursuant to a contractual arrangement between the Transmission Provider or applicable ISO/RTO and a 3rd party provider of the weather data, the weather data shall remain masked for a period of 1 week.

Mr. Sorenson seconded the motion. Mr. Green stated that the proposed language is necessary to addresses the intent of his interpretation of FERC Order No. 890, and that it dismisses the commercial sensitivity issues concerning weather data raised at the subcommittee level. Mr. Wood stated that the subcommittee was more concerned with how the requirement would effect contractual arrangements between Transmission Providers and third parties, than with the commercial sensitivity issues. Mr. Pritchard noted that the subcommittee also recognized that the issue is currently before FERC and determined that it was inappropriate to presume FERC's response. Mr. Norris suggested that the Committee members take a roll call vote on the motion. Ms. McQuade called the vote and the motion failed a simple majority by 2 votes in favor to 13 votes opposed.

Mr. Harshbarger made a motion that the last sentence of 001-n.6.5 be struck, as it unnecessarily presumes that compliance with the proposed standard satisfies the requirement of FERC Order No. 890. Mr. Martinko seconded the motion. The motion passed without opposition.

Mr. Skiba stated that Midwest ISO proposed that 001-n.6.5 be amended to include the additional language captured in the Comments Submitted by L. Wang, Midwest ISO. He made a motion that the following sentence be added to the end of the standard:

> This descriptive statement shall be updated if the Transmission Provider or applicable ISO/RTO changes its underlying load forecast assumptions on an ongoing basis.

Mr. Harshbarger seconded the motion. Mr. Skiba stated that Midwest ISO wanted the standard to be clear that the descriptive statement may be updated. Ms. Weathers stated that she assumed that all updates were acceptable and encouraged since all postings must be accurate. Mr. Gallagher suggested replacing the last few words "assumptions on an ongoing basis with" with the term methodology. Mr. Skiba accepted the suggestion. Mr. Martinko stated that none of the proposed amendments would be necessary if the word "current" was used to modify the underlying load forecast assumptions. The participants approved of Mr. Martinko's suggestion and Mr. Skiba accepted it as a friendly amendment to his motion. The motion passed without opposition.

Ms. Rehman stated that Bonneville Power Administration submitted a comment noting that the definitions of several data elements contained in WEQ-003 (Data Dictionary) and WEQ-013 (Implementation Guide) are not identical. She suggested that modifications be made so that the two are consistent. Mr. Skiba responded that the definitions are consistent even though not identical, and that the Standards Review Subcommittee (SRS) is evaluating all standards for consistency so the issue will be addressed by the subcommittee in future meetings along with all other proposed subcommittee standards.

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Mr. Norris asked the participants if there were any other amendments to the standard, friendly or otherwise. Mr. Sorenson stated that he did not have any other amendments but believes that the recommendation falls short of the intent of FERC Order No. 890. Mr. Wood responded that the subcommittee spent a significant amount of time discussing the scope of the recommendation and that compromises were made by all participants. Mr. Skiba reiterated that there were several interpretations regarding the scope of FERC Order No. 890, but the recommendation reflects the interpretation of a majority of the ESS/ITS and BPS Subcommittee. Mr. Green stated that he does not share the opinions of Mr. Skiba and Mr. Wood and noted that the subcommittee's decisions were not made unanimously. He also cautioned the group about the amount of deference given to the subcommittee, as it is Executive Committee who determines what is filed with the FERC. Ms. McQuade noted that the membership must ratify the Executive Committee action before it can be filed with the FERC. She also stated that the Commission staff has an opportunity to review all minutes, transcripts, and work papers from every meeting so that no minority opinion is swept under the rug. Mr. Gallagher stated that he supports the recommendation, not because he is giving to deference to the subcommittee, but because he read the proposed standard and approves of it.

The vote on the main motion to support the recommendation as modified by three friendly amendments and three amendments was called. [*Vote in section 5 in the minutes*]. The full set of motions and results can be found via the following link: http://naesb.org/pdf3/weq_ec041808a3.doc. There were not enough votes cast during the call to reach a super majority threshold. A notational ballot will be distributed to the WEQ Executive Committee members who did not cast a vote. The revised recommendations can be accessed via the following links:

- Recommendation for 2008 WEQ Annual Plan Item 2.a.i.4, 2.b.v.4, and 2.b.v.5 - Load Forecast and Actual Load Business Practice Standards associated with S&CP changes - as Revised by the WEQ EC on April 18, 2008 - Clean
- Recommendation for 2008 WEQ Annual Plan Item 2.a.i.4, 2.b.v.4, and 2.b.v.5 - Load Forecast and Actual Load Business Practice Standards associated with S&CP changes - as Revised by the WEQ EC on April 18, 2008 - Redline

The notational ballot period conclusion should provide a definitive response on whether the motion passes a super-majority of each quadrant. If the motion passes, then the ratification period begins. Ratification is a 30-day process where each member of the two quadrants has the opportunity to cast a vote to ratify the EC actions. For members returning ratification ballots, 67% of those returned ballots should be in the affirmative for the standards to be considered ratified.

3. New Business

Mr. Pritchard noted that NERC is filing for an extension on the reliability standards, and asked Ms. McQuade if NAESB plans to file an extension as well. Ms. McQuade responded that she is meeting with the chairs of the ESS/ITS and BPS to discuss whether adjustments need to made to the schedule. An extension will not be filed unless one is requested by subcommittee or NERC asks NAESB to file one jointly, and the Managing Committee supports such action. All were urged to attend the upcoming review session on ATC Information Links scheduled for April 22, 2008, followed by the W meeting to discuss and vote on the standard on April 24, 2008.

4. Adjourn

The meeting adjourned at 11:53 AM Central.

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5. NAESB 2008 WEQ EXECUTIVE COMMITTEE VOTING RECORD – APRIL 18, 2008

TRANSMISSION SEGMENT		SUBSEGMENT:	VOTE
Patrick McGovern	Georgia Transmission Corporation	Muni/Coop	
Wendy Weathers for S. Cobb	Salt River Project	Fed/State/Prov.	Support
Dean Ulch	Southern Company Services	IOU	Support
Edward Davis	Entergy Services, Inc.	IOU	Support
Julie Voeck	American Transmission Company	ITC	
Bob Harshbarger	Puget Sound Energy	at large	Support
Michael Wells	WECC	At-Large	
GENERATION SEGMENT			
William J. Gallagher	Vermont Public Power Supply Authority	Muni/Coop	Support
Kathy York	Tennessee Valley Authority	Fed/State/Prov.	
Jalal Babik	Dominion Resource Services, Inc.	IOU	
John Ciza	Southern Company Services	IOU	
Gary Hinners	Reliant Energy, Inc.	at large	
Neal Balu	Integrys Energy Services, Inc.	at large	
MARKETERS/BROKERS SEGMENT			
Clay A. Norris	North Carolina Municipal Power Agency #1	Muni/Coop	Support
Valerie Crockett for C. Harmon	Tennessee Valley Authority	Fed/State/Prov.	Support
Ralph Honeycutt	SUEZ Energy Marketing NA, Inc.	Not IOU Affiliated	
Mark Mitchell	Salt River Project	at large	
John Apperson	PacifiCorp Energy	IOU	
Barry Green	Electric Power Supply Association (EPSA)	at large	Oppose
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT (86% affirmative)			
Robert Williams	Florida Municipal Power Agency	Muni/Coop	
Robert Schwermann	Sacramento Municipal Utility District	Muni/Coop	
Alan Pritchard	Duke Energy Corporation	IOU	Support
Jeffrey C. Mueller	Public Service Electric and Gas Company	IOU	Support
Robert Martinko	FirstEnergy Service Company	at large	Support
Syd Berwager	Bonneville Power Administration	Other	Support
Andy Rodriquez	NERC	At-Large	
END USERS SEGMENT (50% affirmative)			
Bill Heinrich for Lou Ann Westerfield	National Association of Regulatory Utility Commissioners	Regulator	Support
Paul Sorenson	Open Access Technology International, Inc.	At-Large	Oppose

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5. NAESB 2008 WEQ EXECUTIVE COMMITTEE VOTING RECORD – APRIL 18, 2008

INDEPENDENT GRID OPERATORS/PLANNERS (86% affirmative)			
Kevin Gresh for Stu Bresler	PJM Interconnection		Support
Jim Castle	New York Independent System Operator, Inc.		
Matt Goldberg	ISO New England, Inc.		
Steve Greenleaf	California ISO		
Joel Mickey	Electric Reliability Council of Texas		
Ed Skiba for Larry Middleton	Midwest Independent Transmission System Operator		Support
Charles Yeung	Southwest Power Pool		Support
VOTE RESULTS – INDETERMINATE (NOTATIONAL VOTE REQUIRED)		Affirmative	15 (43%)
		Opposing	2 (6%)
		Abstentions	0 (0%)
		Not Voting	18 (51%)
		Total	35

Notes:

- In the voting column, a blank indicates that the EC member did not attend the meeting
- A vote of "Abstain" in the voting column has the same effect as a negative vote and contributes as such to the overall result, but the submitter is casting a vote that is neither in support nor in opposition.

6. Participant Attendance

Name	Organization	Attendance
Kevin Bates	SPP	Phone
Rebecca Berdahl	BPA	Phone
Syd Berwager	BPA	Phone
Jonathan Booe	NAESB	In Person
Ernie Cardone	NYISO	Phone
Valerie Crockett	TVA	Phone
Ed Davis	Entergy	Phone
Renee Free	Santee Cooper	Phone
Cory Galik	NAESB	In Person
Bill Gallagher	Vermont Public Power Supply Authority	Phone
Barry Green	EPSA	Phone
Kevin Gresh	PJM	Phone
Steve Greenleaf	CAISO	Phone
Bob Harshbarger	Puget Sound Energy	Phone
Bill Heinrich	NYPSC	Phone
Rob Martinko	FirstEnergy	Phone
Daryl McGee	Southern Company	Phone
Rae McQuade	NAESB	In Person
Jeffery Mueller	PSE&G	Phone
Clay Norris	North Carolina Municipal Power Agency	Phone

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Name	Organization	Attendance
Alan Pritchard	Duke Energy	Phone
Denise Rager	NAESB	In Person
Barbara Rehman	BPA	Phone
Narinder Saini	Entergy	Phone
Ed Skiba	Midwest ISO	Phone
Paul Sorenson	OATI	Phone
Dean Ulch	Southern	Phone
Wendy Weathers	SRP	Phone
JT Wood	Southern Company	Phone
Charles Yeung	SPP	Phone

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April 25, 2008

TO: NAESB Wholesale Electric Quadrant Executive Committee and Interested Industry Participants

FROM: Jonathan Booe, Meeting Administration/Project Manager

RE: WEQ Executive Committee Meeting Draft Minutes – April 24, 2008

NORTH AMERICAN ENERGY STANDARDS BOARD
EXECUTIVE COMMITTEE CONFERENCE CALL -- WHOLESALE ELECTRIC QUADRANT (WEQ)
April 24, 2008 – 10:00 am to 4:00 pm Central
Hosted by NAESB – Houston, Texas
DRAFT MINUTES

1. Welcome

Mr. Norris opened the meeting and welcomed the meeting participants on the phone. Mr. Booe read the antitrust guidelines. Mr. Booe called the roster of the WEQ Executive Committee members and alternates. Quorum was established. The Executive Committee reviewed the draft agenda. The agenda was adopted by consensus. Mr. Norris stated that he is going to streamline the meeting by asking for amendments to the recommendation rather then reviewing and responding to all of the formal comments first. In doing so, as all have read the comments and are prepared to address the recommendation, they can bring up the related comments as part of the discussion on a given motion to amend the recommendation. Constellation Energy Commodities Group, one of the commenters, was not on the call, but did attend the review session held on April 22. Comments were provided by EPSA, Constellation Energy Commodities Group, and the NAESB Standards Review Subcommittee . The single topic review session was held on April 22. With this approach and the transcripts taken for the meeting, the documentation should provide for a record of decisions made.

2. Consideration of recommendations for standards, comments submitted, and vote on:

Main motion: Mr. Wood made a motion to adopt the Recommendation for 2008 WEQ Annual Plan Item 2.b.vii - WEQ-001 changes for "ATC Information Link" on OASIS and TTC and ATC methodologies and values on behalf of the NAESB WEQ ESS/ITS and BPS subcommittee. Mr. Gallagher seconded the motion.

Friendly amendment 1 to the main motion: Mr. Wood made a friendly amendment to the motion to adopt the modification as proposed by the SRS, to modify the title "WEQ-001-13.1.5 ATC Information Link", identifying it as a new standard. Mr. Skiba explained that the SRS proposed the modification because the Executive Committee has not acted upon the ESS/ITS recommendation which created standard WEQ-001-13.1.5, and was posted for a formal comment period prior to the ATC Information Link recommendation. Mr. Gallagher approved the friendly amendment.

Friendly amendment 2 to the main motion: Mr. Skiba noted that if the previous friendly amendment is accepted, the SRS proposal to remove the note under section 4d of the recommendation should also be accepted. Mr. Middleton proposed a friendly amendment to strike the note under section 4d. Mr. Wood and Mr. Gallagher approved the friendly amendment.

Discussion on a possible friendly amendment: Mr. Sorenson asked if the subcommittee discussed adding a link to the ATC Information Link for the Procedure for Addressing ATC Methodology Questions, to create a standardized place to view the questions and answers submitted. Ms. Rehman stated that the subcommittee discussed standardizing the procedure for submitting and responding to ATC methodology questions but opposing parties preferred the efficiency of their personalized methods (i.e. phone, fax, email). Ms. Otondo stated that standardizing a procedure could raise some compliance concerns. Mr. Gallagher noted that Mr. Sorenson is not suggesting

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standardizing a procedure, but providing a link to the procedure adopted by the Transmission Provider. Mr. Sorenson stated that he recalled a determination in Order 890 or Order 890-A requiring Transmission Providers to establish a procedure for customers to question ATC information. He stated that he is not concerned with the procedure adopted, as long as there is a link so that customers can find the procedure. Ms. Otondo stated that the procedure for submitting questions is covered by the information that will be provided under the ATC Methodology Contact link, and is also addressed in OASIS standards WEQ-001-1.6(b)(2)(ii). Mr. Norris asked if the phone number, address, email address, or other contact method would be included under the contact link. Ms. Otondo responded affirmatively. Mr. Wood stated that he does not believe an additional Procedure for Addressing ATC Methodology Questions link is necessary. Mr. Norris asked Mr. Sorenson if he would like to make a motion to include the additional link. Mr. Sorenson stated that he would not make a motion requesting the additional link unless he could find the requirement in Order 890 or Order 890-A.

Friendly amendment 3 to the main motion: Next, Mr. Middleton offered a friendly amendment to correct the spelling of "implementation" in the first paragraph of WEQ-001-13.1.5. Mr. Wood and Mr. Gallagher approved the friendly amendment.

Friendly amendment 4 to the main motion: Mr. Wood stated that the SRS also recommended in their comments that the text "(as applicable to the Transmission Provider's methodologies)" be removed from the second paragraph of WEQ-001-13.1.5, as it is redundant. Mr. Wood offered a friendly amendment to remove the text. Mr. Gallagher approved the friendly amendment.

Friendly amendment 5 to the main motion: Mr. Wood stated that SRS recommended that the recommendation include a note that NAESB will assign appropriate enumerations to the standard to replace "xx" with next sequential standard number within WEQ-001. Mr. Gallagher clarified that the note will be included as a footnote and approved the friendly amendment.

Friendly amendment 6 to the main motion: Mr. Wood noted that the subcommittee intended to include a link for the Load Forecast Descriptive Statement in the ATC Information Link, however failed to do so. Mr. Wood offered a friendly amendment that a bullet for Load Forecast Descriptive Statement be added to the recommendation. Ms. Rehman offered a friendly amendment to the friendly amendment that the bullet be entitled "Load Forecast Descriptive Statement (as specified in WEQ-001-n.6.5). *["n" represents 2008 WEQ Annual Plan Item 2.b.vii]"*.

Ms. McQuade reviewed the six friendly amendments offered and accepted by the participants. Mr. Norris asked if there were any other friendly amendments to the recommendation. As there were none, the discussion proceeded to amendments to the main motion including 6 friendly amendments.

Discussion on proposed amendment to the main motion: Mr. Green stated that the Executive Committee discussed modifying the section of the standard giving Transmission Provider's wide discretion to redact certain information. He made a motion to amend the main motion that the following language be added to the paragraph to provide guidance as to what information may be redacted:

> The posting of this information would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns. The document entitled "List of ATC-Related Information", which categorizes some ATC information as publicly available or not publicly available due to reliability, security or commercial sensitivity reasons, and is retained in ---------, should be used as a guideline in the determination of whether particular information should be considered appropriate for redaction. Any section that has been redacted shall retain the heading and will include the reason for the redaction. Appropriate reasons for redaction are: "Market Sensitive Information", "CEII Information", "Security Sensitive Information" or "Reliability Sensitive Information".

Mr. Green stated that the "List of ATC-Related Information" has been reviewed by NERC and is slated to be reviewed by the subcommittee in the near future. He stated that he is not suggesting that the list become a standard, but rather a guideline that be used in conjunction with the standard. Mr. Mucci seconded the motion. Mr. Yeung confirmed that the list would just be used as a guideline.

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Ms. Otondo noted that guidelines are difficult from a compliance perspective and that the subcommittee had not determined if "publicly available" means made available on request or posted on OASIS. Mr. Green responded that the "publicly available" issue is not important in this context. Ms. Otondo stated that it could be implied that everything included on the list should be included in the ATCID. Mr. Mucci noted that list contains information that will not be made publicly available, rather than what information should be made publicly available. Mr. Norris offered a friendly amendment to modify the motion to remove the reference to the publicly available information, which was accepted:

> The posting of this information would be subject to the Transmission Provider's ability to redact certain provisions due to market, security or reliability sensitivity concerns. The document entitled "List of ATC-Related Information", which categorizes some ATC information as not publicly available due to reliability, security or commercial sensitivity reasons, and is retained in ---------, should be used as a guideline in the determination of whether particular information should be considered appropriate for redaction. Any section that has been redacted shall retain the heading and will include the reason for the redaction. Appropriate reasons for redaction are: "Market Sensitive Information", "CEII Information", "Security Sensitive Information" or "Reliability Sensitive Information".

Mr. Gallagher stated that he is concerned that the original language is too broad; however he shares Ms. Otondo's apprehensions about a standard referencing an indefinite list. He noted that there may be other ways to address the language and add specificity. As an alternative, Mr. Pritchard noted that Executive Committee could delay adopting the standard until the list is complete and still meet a August 7 deadline. Concerns were raised in the discussion about the specificity of the amendment regarding its reference to reliability or security reasons, which are within NERC's purview and should not be referenced as part of a NAESB activity.

The participants discussed the procedure for remanding the standard to the subcommittee. Ms. McQuade noted that the Order 890 standards must be filed by August 7, 2008, and that currently there is no plan to file an extension. Mr. Norris asked if it would be procedurally possible to revise the annual plan to include a review of the standard once the list is complete. Ms. McQuade answered affirmatively. Ms. McQuade explained that the EC could adopt the standard, as is, and then make a motion to send the single issue to the subcommittee.

Ms. Rehman suggested a course of action of the EC approving the standard as is with Mr. Green's addition or its intent placed in the summary section of the recommendation. In this manner, the concerns raised on redacted information would be acknowledged in the recommendation itself. Mr. Green stated that if the subcommittee remands the recommendation to the subcommittee, it can be addressed with in the August 7 timeframe as ESS/ITS and BPS has eight days of meetings in May. Ms. Otondo responded that two of the days are being given to the ESS/ITS for conditional firm standards development – which is under a July deadline. Several other Order 890 items are being developed within the days allotted to the groups.

Mr. Pritchard moved to call the question. There was no opposition. The vote on the amended motion to modify the main motion to include text in the standard WEQ-001-13.1.5 regarding reference to a list to be used as guidance to identify reason for redacting ATC related information was called. [*Vote in section 5 in the minutes as M1*]. The motion to amend the main motion failed a simple majority vote (2 in favor and 17 opposed).

Mr. Norris asked if there were any other motions to modify the main motion on the table. None were offered.

Vote on the main motion with 6 friendly amendments: The vote on the motion to adopt the recommended standard WEQ-001-13.1.5 for ATC information links as presented with six friendly amendments made during the meeting was called. [*Vote in section 5 in the minutes as M2*]. The result was indeterminate. There were not enough votes cast during the call to reach a super majority threshold. A notational ballot will be distributed to the WEQ Executive Committee members who did not cast a vote. The revised recommendations can be accessed via the following links:

Recommendation for 2008 WEQ Annual Plan Item 2.b.vii - WEQ-001 changes for "ATC Information Link" on OASIS and TTC and ATC methodologies and values - as revised by the WEQ EC 04/24/2008 (Clean)

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Recommendation for 2008 WEQ Annual Plan Item 2.b.vii - WEQ-001 changes for "ATC Information Link" on OASIS and TTC and ATC methodologies and values - as revised by the WEQ EC 04/24/2008 (Redline)

The notational ballot period conclusion should provide a definitive response on whether the motion passes a super-majority of each quadrant. If the motion passes, then the ratification period begins. Ratification is a 30-day process where each member of the two quadrants has the opportunity to cast a vote to ratify the EC actions. For members returning ratification ballots, 67% of those returned ballots should be in the affirmative for the standards to be considered ratified.

Other actions: Following the vote on the recommendation, Mr. Gallagher made a motion the subcommittee address "certain provisions due to market, security or reliability sensitivity concerns" in an attempt to define those terms in connection with the redaction provision of the standard. Mr. Schwermann seconded the motion after affirming that the item would be handled in the subcommittee's normal course of business. Ms. Weathers noted that she understands the intent of motion but does not believe the language captures it. Ms. Rehman offered a friendly amendment to the motion, to request the subcommittee to provide greater specificity regarding the language of the standard "certain provisions due to… market sensitivity concerns" in connection with limitations for redaction. Mr. Gallagher and Mr. Schwermann approved of the amendment. Mr. Pritchard asked the group if it would be more appropriate to have NERC address the issue. Mr. Green stated that NERC already addressed the issue through the list and that he does not believe the motion provides the level of specificity needed. Mr. Mucci stated that motion does not reflect the risk or concern discussed by the EC members. The vote on the motion to provide direction to the subcommittee for modifications to WEQ-001-13.1.5 or a related standard to provide additional language regarding limitations on redactions for ATC related information that is posted for public access was called. The motion failed a simple majority vote. [*Vote in section 5 in the minutes as M3*].

3. New Business

No new business was discussed.

4. Adjourn

The meeting adjourned at 12:19 PM Central.

5. NAESB 2008 WEQ EXECUTIVE COMMITTEE VOTING RECORD AND ATTENDANCE – APRIL 24, 2008

SEGMENT/EC MEMBER OR ALTERNATE/MEMBER COMPANY		SUBSEGMENT	ATTENDANCE	VOTING RECORD		
				M1	M2	M3
TRANSMISSION SEGMENT (57% affirmative – M2)						
Patrick McGovern	Georgia Transmission Corporation	Muni/Coop	✔	✕	✔	✕
Wendy Weathers for S. Cobb	Salt River Project	Fed/State/Prov.	✔	✕	✔	✕
J.T. Wood for D. Ulch	Southern Company Services	IOU	✔	✕	✔	✕
Edward Davis	Entergy Services, Inc.	IOU	✔	✕	✔	✔
Julie Voeck	American Transmission Company	ITC	✕			
Bob Harshbarger	Puget Sound Energy	at large	✔	✕	✔	✕
Michael Wells	WECC	At-Large	✔			
GENERATION SEGMENT (43% affirmative – M2)						
William J. Gallagher	Vermont Public Power Supply Authority	Muni/Coop	✔	✕	✔	✔

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5. NAESB 2008 WEQ EXECUTIVE COMMITTEE VOTING RECORD AND ATTENDANCE – APRIL 24, 2008

SEGMENT/EC MEMBER OR ALTERNATE/MEMBER COMPANY		SUBSEGMENT	ATTENDANCE	VOTING RECORD		
				M1	M2	M3
Kathy York	Tennessee Valley Authority	Fed/State/Prov.	✔	✕	✔	
Jalal Babik	Dominion Resource Services, Inc.	IOU	✕			
John Ciza	Southern Company Services	IOU	✔	✕	✔	✕
Ron Mucci	Entegra Power Group LLC	Merchant	✔	✔	✕	✕
Gary Hinners	Reliant Energy, Inc.	at large	✕			
Neal Balu	Integrys Energy Services, Inc.	at large	✕			
MARKETERS/BROKERS SEGMENT (33% affirmative – M2)						
Clay A. Norris	North Carolina Municipal Power Agency #1	Muni/Coop	✔	✕	✔	✔
Valerie Crockett for C. Harmon	Tennessee Valley Authority	Fed/State/Prov.	Ballot		✔	
Ralph Honeycutt	SUEZ Energy Marketing NA, Inc.	Not IOU Affiliated	✕			
Mark Mitchell	Salt River Project	at large	✕			
John Apperson	PacifiCorp Energy	IOU	✕			
Barry Green	Electric Power Supply Association (EPSA)	at large	✔	✔	✕	✕
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT (43% affirmative for M2)						
Robert Williams	Florida Municipal Power Agency	Muni/Coop	✕			
Robert Schwermann	Sacramento Municipal Utility District	Muni/Coop	✔	✕	✔	✔
Alan Pritchard	Duke Energy Corporation	IOU	✔	✕	✔	✕
Jeffrey C. Mueller	Public Service Electric and Gas Company	IOU	✕			
Robert Martinko	FirstEnergy Service Company	at large	✕			
Syd Berwager	Bonneville Power Administration	Other	✔	✕	✔	✔
Andy Rodriquez	NERC	At-Large	✕			
END USERS SEGMENT (50% affirmative for M2)						
Lou Ann Westerfield	NARUC	Regulator	✕			
Paul Sorenson	Open Access Technology International, Inc.	At-Large	✔	✕	✔	
INDEPENDENT GRID OPERATORS/PLANNERS (57% affirmative for M2)						
Stu Bresler	PJM Interconnection		✕			
Greg Campoli for J. Castle	New York Independent System Operator, Inc.		✔	✕	✔	
Matt Goldberg	ISO New England, Inc.		✕			
Steve Greenleaf	California ISO		✔	✕	✔	✔
Joel Mickey	Electric Reliability Council of Texas		✕			
Larry Middleton	Midwest ISO		✔	✕	✔	✔
Charles Yeung	Southwest Power Pool		✔	✕	✔	✔
QUORUM (50% of 36 seated members is 18)		Attendance	19			

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5. NAESB 2008 WEQ EXECUTIVE COMMITTEE VOTING RECORD AND ATTENDANCE – APRIL 24, 2008

SEGMENT/EC MEMBER OR ALTERNATE/MEMBER COMPANY	SUBSEGMENT	ATTENDANCE	VOTING RECORD		
			M1	M2	M3
TYPE OF VOTE (SIMPLE OR SUPER MAJORITY)			Simple	Super	Simple
VOTE TALLY	Total Affirmative		2	18 (50%)	8
	Opposing		17	2 (6%)	8
	Abstentions		0	0	0
	Votes Outstanding		n/a	16 (44%)	n/a
OUTCOME			Fail	Indeterminate	Fail

Motions:

M1 Motion 1 was made Barry Green, seconded by Ron Mucci, to modify the main motion to include text in the standard WEQ-001-13.1.5 regarding reference to a list to be used as guidance to identify reason for redacting ATC related information. The motion to amend the main motion failed to achieve a 50% simple majority vote.

M2 Motion 2, the main motion, was made by J.T. Wood and seconded by Bill Gallagher to adopt the recommended standard WEQ-001-13.1.5 for ATC information links as presented with six friendly amendments made during the meeting. The main motion with friendly amendments had 18 votes in favor and 2 votes opposed. The result is indeterminate and a notational ballot will be sent out. To pass, the motion needs 6 additional affirmative votes to achieve a minimum 67% threshold of possible voters, and at least one affirmative vote from the marketer-broker segment to achieve or exceed the 40% threshold for all segments.

M3 Motion 3 was made to provide direction to the subcommittee for an enhancement to WEQ-001-13.1.5 or a related standard to provide additional language regarding limitations on redactions for ATC related information that is posted for public access. This motion failed a simple majority vote by having a tie 8-8 vote.

Notes:

- In the voting column, a blank indicates that the EC member did not attend, was not present when the vote was called, did not return a ballot prior to the meeting, or did not return a ballot after the meeting.
- A vote of "Abstain" in the voting column for M2, a super-majority vote, has the same effect as a negative vote and contributes as such to the overall result, but the submitter is casting a vote that is neither in support nor in opposition.
- A notational ballot will be sent out on April 25 with an expected return date of May 2.

6. Other Participant Attendance

Participant	Organization
Marcie Otondo	Arizona Public Service
Barbara Rehman	Bonneville Power Administration
Marjorie Perlman	Energy East Management
Narinder Saini	Entergy Services
Ed Skiba	Midwest Independent Transmission System Operator
Jonathan Booe	NAESB
Rae McQuade	NAESB
Denise Rager	NAESB
Ernie Cardone	New York Independent System Operator
Renee Free	Santee Cooper

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

TAB 3

Recommendations for Standards Actions

- Contained in this section are:
  - 2008 AP 2.a.i.5, 2.a.i.6, 2.a.ii.1-3 - Rebid of Partial Service, Preconfirmation Priority, Metrics, Redispatch Cost Posting with comments due March 21, 2008. Comments were received from WEQ BPS-ESS-ITS Subcommittees, Midwest ISO, PJM, WEQ SRS, BPA, Southern Company
  - R03017 - Operate Within Limits with comments due April 4. Comments were received from We Energies.
  - 2008 AP 2.b.v.2 Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards with comments due April 16. Comments were received from EPSA.
  - 2008 AP 2.b.iv.1-3 TRM Business Practice Standards to complement the NERC reliability standards for TRM, including specification of the appropriate uses of TRM and when transmission providers may set aside TRM, with comments due May 8. Comments were received from EPSA.
- If additional comments are received after publication date, they will be provided under separate cover as supplemental materials.
- The WEQ EC will be asked to consider the recommendations for standards actions and the comments submitted for each action.
  - For the first recommendation, the EC members can (1) accept with no changes, (2) accept with changes identified during the meeting, (3) remand back to the relevant subcommittees for further work, (4) postpone action to a later date, or (5) reject - a status quo position. Actions (1) and (2) require a super-majority vote – 67% affirmative vote of all seated WEQ EC members, and 40% of all seated WEQ EC members of each segment. Actions (3), (4) and (5) are simple majority votes.
  - For the remaining three recommendations, the EC members can (1) support the recommendation to maintain the status quo, (2) disagree with the recommendation to maintain status quo and amend the standards in the meeting, (3) remand back to the relevant subcommittees for further work or (4) postpone action to a later date. Action (2) requires a super-majority vote – 67% affirmative vote of all seated WEQ EC members, and 40% of all seated WEQ EC members of each segment. Actions (1), (3) and (4) are simple majority votes.
- The materials in Tab 3 correspond to agenda item 3.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS Subcommittee**
Request No.: **2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title: **WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

1. RECOMMENDED ACTION:

___Accept as requested
XX Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

XX Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
XX Modification	XX Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

In the FERC Order 890 (paragraph 1378) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about re-bid of partial service. In FERC Order 890-A under docket Nos. RM-05-17 and RM05-25, the Commission declined to dictate beyond the principles outlined in Order 890 for rebid of partial service. (See paragraph 766).

In the FERC Orders 890 (paragraphs 1392 and 1401) and FERC Order 890-A (paragraphs 786-790) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about preconfirmation priority.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

In the FERC Orders 890 (paragraph 413) and FERC Order 890-A (paragraph 142) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of transmission service metrics.

In the FERC Orders 890 (paragraph 1318) and FERC Order 890-A (paragraphs 718, 720, 721, 722) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of planning study metrics.

In the FERC Order 890 (paragraph 1162) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about redispatch cost postings.

The ESS/ITS has reviewed Orders 890 and 890-A and is recommending adoption of the following standards. The Subcommittee believes this recommendation complies with the guidance provided by the Commission. The subcommittee is recommending moving some of the information link requirements from WEQ 002 to WEQ 001. Finally the Subcommittee is recommending recognition of a Generator Imbalance Ancillary Service.

RECOMMENDED STANDARDS:

The following proposed additions are to be included in the WEQ-001 Definition of Terms. The specific enumeration for each of these definitions will be established by NAESB Staff after ratification.

001-0.xx **Control Area** – As used in NAESB Standards, shall be synonomous with the NERC definition for the Balancing Authority Area.

001-0.yy **Partial Service** - transmission service offered or granted by a Transmission Provider that is for a shorter duration than requested (start-time through stop-time), less capacity than requested, or both.

The following are proposed redlined changes and additions to WEQ-001-2 Standard Terminology for Transmission and Ancillary Services

01-2.1.9 Sliding Yearly

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **ESS/ITS Subcommittee**
Request No.: **2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title: **WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year.

For example SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

01-2.1.13 Extended Yearly

The service starts at 00:00 of any date and stops at 00:00 more than one year later.

The Transmission Provider may limit the service to be in increments of full years or full calendar months.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

Other Service Attribute Values

Seven ancillary services are pre-defined. Other services may be offered pursuant to filed tariffs.

001-2.5.4 Energy Imbalance Service (EI) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour and in accordance with Schedule 4 of the pro forma tariff.

…

001-2.5.7 Generator Imbalance Service (GI) - is provided when a difference occurs between the output of a generator located in the Transmission Provider’s Control Area and a delivery schedule from that generator to (1) another Control Area or (2) a load within the Transmission Provider’s Control Area over a single hour and in accordance with Schedule 9 of the pro forma tariff.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS Subcommittee**
Request No.: **2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
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The following are proposed redlined changes and additions to WEQ-001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4.1 All reservations and price and/or capacity negotiations shall be conducted on OASIS.

Phase IA Negotiation Process State Transition Diagram

The NAESB OASIS Implementation Guide (WEQ-013) provides a process state diagram to define the Customer and Transmission Provider interactions for negotiating transmission service. This diagram defines the allowable steps in the reservation request, negotiation, approval, confirmation and post-confirmation processes.

001-4.4 RESERVED

001-4.5 RESERVED

Negotiations Without Competing Bids

The following practices are defined in order to enhance consistency of the reservation process across OASIS nodes.

001-4.6 A Transmission Provider/Seller shall respond to a Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-2 Reservation Timing Requirements.** The time limit is measured from the time the request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

I. INVALID
II. DECLINED
III. REFUSED
IV. COUNTEROFFER
V. ACCEPTED
VI. RECEIVED or STUDY (leading to REFUSED, DECLINED, COUNTEROFFER, or ACCEPTED).

001-4.7 Prior to setting a request to ACCEPTED, COUNTEROFFER, or REFUSED a Transmission Provider shall evaluate the appropriate resources and ascertain that the requested transfer capability is (or is not) available.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS Subcommittee**
Request No.: **2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
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001-4.7.1 If the Transmission Provider determines there is insufficient transfer capability available to grant the Transmission Customer's request and there is no obligation to provide Partial Service, the Transmission Provider may respond by setting the request status to REFUSED.

001-4.7.2 If the Transmission Provider determines there is sufficient transfer capability available to grant the Transmission Customer's request and the customer's bid price is at least equal to the provider's current posted offer price over time and all other Transmission Provider requirements have been met, the Transmission Provider shall respond by setting the request status to ACCEPTED.

001-4.7.2.1 If the Transmission Customer does not specify a bid price, the Transmission Provider shall consider the bid price to be equal to the current posted offer price when evaluating the request.

001-4.7.3 The Transmission Provider shall use the status of COUNTEROFFER to initiate the negotiation of requested capacity (Partial Service) and/or price.

001-4.7.3.1 The Transmission Provider is not required to provide short-term Partial Service in response to a Long-Term request.

001-4.7.3.2 If the available transfer capability can support only a portion of the total capacity requested by the Transmission Customer and the Transmission Provider is obligated or elects to offer what limited capability is available to the customer, the Transmission Provider shall notify the Transmission Customer on OASIS by setting the amount of capacity being offered over time in the transmission request and updating the request status to COUNTEROFFER.

001-4.7.3.3 If the Transmission Customer is attempting to negotiate price by submission of a bid price that is lower or higher than the current posted offer price, and the Transmission Provider elects to not negotiate price, the Transmission Provider shall notify the customer by setting the request status to DECLINED.

001-4.7.3.4 If the Transmission Provider elects to (continue to) negotiate price, the provider shall update the offer price over time in the transmission request, indicate whether the price being negotiated is higher or lower than the posted price, and set the request status to COUNTEROFFER.

001-4.7.3.5 If both capacity and price are being negotiated, that negotiation may be performed simultaneously.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

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001-4.8 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

001-4.9 The Customer may change a request from QUEUED, RECEIVED, STUDY, COUNTEROFFER, REBID, or ACCEPTED to WITHDRAWN at any time prior to CONFIRMED except as follows.

001-4.9.1 Preconfirmed requests for short-term firm and non-firm point-to-point service shall not be allowed to be WITHDRAWN by the Customer unless counteroffered by the Transmission Provider, after which the Customer shall be allowed to withdraw the request.

001-4.9.2 For a preconfirmed request for short-term firm point-to-point service, if the Transmission Provider has notified the Customer that a System Impact Study is needed, the Customer may, prior to execution of the System Impact Study Agreement, request that the Transmission Provider void (status of DECLINED) the request. The Transmission Provider must honor such request.

001-4.9.3 In the case of an inadvertent error, the Customer may in the very near term request that the Transmission Provider void (status of ANNULLED) a pre-confirmed request/reservation for short-term firm or non-firm point-to-point service. Honoring such a request is at the discretion of the Transmission Provider.

001-4.10 From ACCEPTED or COUNTEROFFER, a Customer may change the status to CONFIRMED, REBID or WITHDRAWN. The Customer has the amount of time designated as Customer Confirmation Time Limit in Table 4-2 Reservation Timing Requirements to change the state of the request to CONFIRMED. The Customer time limit is measured from the first time the request is moved to ACCEPTED or COUNTEROFFER, and is not reset with subsequent iterations of negotiation.

001-4.10.1 The Transmission Customer shall use the request status of REBID to initiate or continue the negotiation of price and/or capacity.

001-4.10.2 The Transmission Customer may negotiate for a lower amount of transmission capacity by updating the capacity requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID. For example, the Customer may want to coordinate the level of transmission service purchased across multiple Transmission Providers or other such purposes. Negotiation for a higher amount of transmission capacity shall not be allowed. A customer

seeking additional capacity must submit a new request which will be assigned a new queue position.

001-4.10.3 The Transmission Customer may negotiate for a higher or lower price by updating the bid price requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID.

001-4.10.4 The Transmission Customer shall positively acknowledge and agree to both the price and capacity over time by setting the bid price and requested capacity equal to the Transmission Provider's offer price and granted capacity prior to confirmation of the transmission service request.

001-4.12 Should the Customer elect to initiate or continue the negotiation of price and/or capacity by moving a transmission service request to REBID, the Transmission Provider shall respond by taking the request to a DECLINED, SUPERSEDED, ACCEPTED, or COUNTEROFFER state within the Provider Counter Time Limit, specified in **Table 4-2 Reservation Timing Requirements.** The Transmission Provider response time is measured from the most recent REBID time.

001-4.12.1 The Transmission Provider shall positively acknowledge and agree to both the price and capacity over time by setting the offer price and granted capacity equal to the Transmission Customer's bid price and requested capacity prior to acceptance of the transmission service request.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: **ESS/ITS Subcommittee**
Request No.: **2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title: **WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

001-4.13 The following timing requirements shall apply to all Point-to-Point transmission service requests:

TABLE 4-2
Request Timing Requirements

Class	Service Increment	Time QUEUED Prior to Start	Provider Evaluation Time Limit[1]	Customer Confirmation Time Limit[2] after ACCEPTED or COUNTEROFFER[3]	Provider Counter Time Limit after REBID[4]
Non-Firm	Hourly	<1 hour	Best effort	5 minutes	5 minutes
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes	10 minutes
Non-Firm	Daily	N/A	30 minutes	2 hours	10 minutes
Non-Firm	Weekly	N/A	4 hours	24 hours	4 hours
Non-Firm	Monthly	N/A	2 days [5]	24 hours	4 hours
Firm	Daily	< 24 hours	Best effort	2 hours	30 minutes
Firm	Daily	N/A	30 days[6]	24 hours	4 hours
Firm	Weekly	N/A	30 days[6]	48 hours	4 hours
Firm	Monthly	N/A	30 days[6]	4 days	4 hours
Firm	Yearly	60 days [7]	30 days	15 days	4 hours

Notes for Table 4-2:

[1] Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.
[2] Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override pre-exemption deadlines.
[3] Measurement starts at the time the request is first moved to either ACCEPTED or COUNTEROFFER. The time limit does not reset on subsequent changes of state.
[4] Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.
[5] Days are defined as calendar days.
[6] Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers shall make best efforts to respond within 72

hours, or prior to the scheduling deadline, whichever is earlier, to a request for Daily Firm Service received during period 2-30 days ahead of the service start time.

[7] Subject to Section 17.1 of the pro forma tariff, whenever feasible and on a nondiscriminatory basis, transmission providers should accommodate requests made with less than 60 days notice.

Negotiations with Competing Bids for Constrained Resources

001-4.14 The following are the relative queue priorities of Service Request Tiers[1]. The priorities refer only to negotiation of service and do not refer to curtailment priority.

001-4.15 Reservations and requests shall be handled in a first-come-first-served order based on QUEUE_TIME. Within a given Service Request Tier, with the exception of Service Request Tier 1, where there are competing requests for a constrained resource, the following request attributes shall be used to determine the relative priority for granting of service.

I.....Service Increment (Monthly, Weekly, Daily, Hourly)
II.....Duration (the amount of time between the Start Date and the Stop Date)
III.....Pre-confirmation Status
IV.....Price
V.....Queue Time

001-4.16 Table 4-3 describes the relative queue priorities of competing service requests and reservations, with respect to the conditions whereby a subsequent request preempts a previously queued request or reservation, and the rules for offering right-of-first-refusal. If two competing requests do no meet the specific criteria listed in Table 4-3, the requests shall be evaluated and processed in a first-come-first-served order based on QUEUE_TIME. While the table indicates the relative priorities of two competing requests, it also is intended to be applied in the more general case of more than two competing requests.

[1]Note: The term Tier is introduced to avoid confusion with existing terms such as TS_CLASS.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittee
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Table 4-3
Priorities For Competing Reservations And Requests

ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
1	Tier 1: Long-term Firm, Native Load, and Network Firm	N/A - Not preempted by a subsequent request.	N/A
2	Tier 2: Pending (not confirmed) or confirmed but conditional Short-term Firm	Tier 1: Long-term Firm, Native Load, and Network Firm, Once Request 1 is unconditional, it may not be preempted.	No
3a	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment.	No
3b	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	No
3c	Tier 2: Pending pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] and higher price	No
3d	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	No
3e	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment and of equal or longer duration[1]	No
3f	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	Yes
3g	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	Yes
3h	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] and higher price.	Yes
4	Tier 3: Network Service From Non-Designated Resources	Tiers 1 and 2: All Firm (including Network).	No
5	Tier 4: All Non-Firm PTP	Tiers 1 and 2: All Firm (including Network).	No
6	Tier 4: All Non-Firm PTP	Tier 3: Network Service from Non-Designated Resources.	No
7	RESERVED		
7a	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment.	No

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ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
7b	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	No
7c	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration and higher price	No
7d	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment	No
7e	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment and of equal or longer duration[1]	No
7f	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration and higher price	No
7g	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm of higher service increment	Yes
7h	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	Yes
8	RESERVED		
9	Tier 5: Non-firm PTP Service over secondary receipt and delivery points.	Tiers 1 through 4	No
10	Tier 6: Non-firm Next Hour Market Service	Tiers 1 through 5	No

Notes for Table 4-3:

[1] Longer duration means more multiples of the same SERVICE_INCREMENT in a single request. Each such multiple must be at the same level of capacity. For example, a single request for three consecutive days shall be considered longer duration than a single request for two consecutive days. Also, multiple service requests or reservations may not be grouped for the purpose of determining duration. For example, three separate one-day requests for three consecutive days of service shall not be considered longer duration than a single request for two consecutive days.

001-4.17 For a request or reservation that is Superseded or Displaced, respectively, the Transmission Provider must indicate the Assignment Reference Number of the competing request and the reason for denial of service in the SELLER_COMMENTS field.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
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001-4.18 Given competing requests for a limited resource and a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from any pending (not confirmed) state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-3. These state changes require dynamic notification to the Customer if the Customer has requested dynamic notification on OASIS.

001-4.26 RESERVED

001-4.27 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

The following are proposed additions to the WEQ-001 OASIS Standards

001-13 OASIS GENERAL POSTING STANDARDS

001-13.1 OASIS HOME PAGE

The Transmission Provider shall establish the following HTML hyperlinks to standardized information postings of a general (i.e., non-template) nature located on the Transmission Provider's OASIS Home Page at their registered OASIS URL address. These links must appear as named and in the following order:

NAESB Home Page

Standards of Conduct

Performance Metrics

Business Practices, Waivers, and Exemptions

ATC Information

Nothing in this standard shall preclude the Transmission Provider from establishing additional hyperlinks or making additional content available on their OASIS Home Page.

001-13.1.1 NAESB HOME PAGE LINK

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
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The "***NAESB Home Page"*** hyperlink shall direct an OASIS user to the NAESB Home Page.

001-13.1.2 STANDARDS OF CONDUCT LINK

The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g,* Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g,* Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the "***Standards of Conduct***" link displayed on the Transmission Provider's OASIS Home Page.

Emergency Circumstances Deviations (§358.4(a)(2))

Marketing and Energy Affiliate List (§358.4(b)(1))

Shared Facilities (§358.4(b)(2))

Organizational Charts and Job Descriptions (§358.4(b)(3)(i))

Common Employees (§358.4(b)(3)(iii))

Potential Merger Partners (§358.4(b)(3)(v))

Transfers[2] (§358.4(c))

Information Disclosure[3] (§358.5(b) (3))

Voluntary Consent to Share Non-Affiliated Customer Information (§358.5(b)(4))

Discretionary Actions under Tariff [4] (§358.5(c)(4))

Discounts[5] (§358.5(d))

Chief Compliance Officer (§358.4(e)(6))

[2] According to WEQ 002-4.3.10.4 a template is required for this item.
[3] According to WEQ 002-4.3.10.6 a template is required for this item.
[4] According to WEQ 002-4.3.10.5 a template is required for this item.
[5] According to WEQ 002-4.3.2.1 a template is required for this item.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
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Written Procedures for Implementation (§358.4 (e)(3))

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to Standards of Conduct. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to WEQ 002-3.1

001-13.1.3 PERFORMANCE METRICS LINK

The following types of information, as required by FERC Statutes and Regulations (18 CFR 37.6(h), 18CFR 37.6(i), and 18 CFR 37.6(j)(2)) shall be accessible from the ***"Performance Metrics"*** link.

a. The Transmission Provider shall establish a link entitled ***"Transmission Study Metrics"*** to view the information as required by 18 CFR 37.6(h). The information must be made available on a calendar quarterly basis and be posted within 15 days of the end of the quarter. The information must remain available on OASIS for three years. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

b. The Transmission Provider shall establish a link entitled ***"Transmission Service Request Metrics"*** to view the information as required by 18 CFR 37.6(i). The information must be made available on a monthly basis and be posted by the 15th day of the subsequent month. The information must remain available for download on OASIS for three months. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

c. The Transmission Provider shall establish a link entitled ***"Redispatch Cost"*** to view the information as required by 18 CFR 37.6(j)(2). The data must be made available on a monthly basis and be posted as soon as practical after the end of each month, but no later than when the invoice for redispatch-related services is sent to the Transmission Customer. The information must remain available for download on OASIS for three months. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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001-13.1.4 BUSINESS PRACTICES, WAIVERS, AND EXEMPTIONS LINK

The Transmission Provider shall post information related to 1) any provider specific business practices, 2) any waivers or exemptions granted from any of the OASIS requirements or standards, and 3) any other pertinent information related to the conduct of business with the Transmission Provider.

01-13.1.5 ATC INFORMATION LINK

Hold for future development by BPS/ESS/ITS to include NERC related documents and the required CBM/TRM statements. Prior version stated in WEQ 002-4.5.1:

Information related to the Transmission Provider's methodology for computing and application of Capacity Benefit Margin (CBM) and Transmission Reliability Margin (TRM). If the Transmission Provider does not use CBM or TRM in their assessment of Available Transmission Capability (ATC), that information shall also be in INFO.HTM.

…

The following are proposed redlined changes to WEQ-002-3.4 PROVIDER UPDATING REQUIREMENTS

002-3.4 PROVIDER UPDATING REQUIREMENTS

The following are the Provider update requirements:

a. **Provider Posting of TS Information**: Each Provider (including Secondary Providers and Value-Added Providers) shall be responsible for writing (posting) and updating TS Information on their OASIS Node. No User shall be permitted to modify a Provider's Information.

b. **General Postings**

(i) **INFO.HTM:** Each Provider shall provide general information on how to use their node and describe all special aspects, such as line losses, congestion charges and assistance. The address for the directory of this information shall be INFO.HTM (case sensitive), an HTML web page, linked to the Provider's registered URL address. See WEQ 002-4.5 for information required to be on the web page INFO.HTM.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
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(ii) **OASIS Home Page:** NAESB Standard WEQ-001-13 establishes specific HTML hyperlinks which must be made available on the Transmission Provider's OASIS home page at their registered URL address.

…

The following are redlined changes to WEQ-002-4.5 GENERAL POSTINGS

002-4.5 GENERAL POSTINGS

002-4.5.1 INFO.HTM

When a regulatory order requires informational postings on OASIS and there is no OASIS S&CP template to support the postings or it is deemed inappropriate to use a template, or the location of the posting has not been specified in WEQ-001-13, there shall be a reference in INFO.HTM to the required information, including, but not limited to, references to the following:

- o A common source of interconnection wide curtailment and interruption information, such as the NERC Transmission Loading Relief (TLR) web site.
- o The location of the list of system studies conducted.
- o Information on requesting the text file of the tariffs and service agreements.

For the purposes of this section, any link to required informational postings that can be accessed from INFO.HTM would be considered to have met the OASIS posting requirements, provided that the linked information meets all other OASIS accessibility requirements.

002-4.5.2 OASIS Home Page The NAESB WEQ-001-13 Standards establishes specific informational postings that must be accessible from the Transmission Provider's OASIS Home Page.

The following are proposed redlined changes to WEQ-013-2.2 Transaction Status to reflect the addition of WEQ-001- 4.9.3. Note: The definition of ANNULLED for the Data Dictionary Element Name Status will also be changed to reflect the addtion of WEQ-001-4.9.3.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

013-2.2 Transaction Status

ANNULLED = assigned by the Seller when, by mutual agreement with the Customer, a reservation or pre-confirmed request is to be voided, or assigned unilaterally by the Primary Provider when a resale reservation is to be voided. (Final state).

4. SUPPORTING DOCUMENTATION

a. Description of Request:

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions relevant to recommendation:

> *413 The Commission adopts the proposed requirement to post on OASIS metrics related to the provision of transmission service under the OATT. Specifically, transmission providers must post (1) the number of affiliate versus non-affiliate requests for transmission service that have been rejected and (2) the number of affiliate versus non-affiliate requests for transmission service that have been made. This posting must detail the length of service request (e.g., short-term or long-term) and the type of service requested (e.g., firm point-to-point, non-firm point-to-point or network service). The Commission also will require transmission providers to post their underlying load forecast assumptions for all ATC calculations and, to post on a daily basis, their actual daily peak load for the prior day. The Commission directs transmission providers to work through NAESB to develop standards for consistent methods of posting the new requirements on OASIS.*

> *1162 Accordingly, to provide greater availability of redispatch information, the Commission adopts certain additional posting requirements for transmission providers. Specifically, we direct each transmission provider to post on OASIS its monthly average cost of redispatch for each internal congested transmission facility or interface over which it provides redispatch service using planning redispatch or reliability redispatch under the pro forma OATT.[6] Additionally, to demonstrate the range of redispatch costs each month, the Commission directs transmission providers to post a high and low redispatch cost for the month for each of these same transmission constraints. The transmission provider shall calculate the monthly average cost in $/MWh for each congested transmission facility by dividing monthly total redispatch costs (at the facility) by the total MWhs that*

[6] The relevant reliability redispatch costs for posting purposes are those costs the transmission provider invoices network customers based on a load ratio share pursuant to section 33.3 of the pro forma OATT. The transmission provider need not perform new calculations of out-of-merit dispatch costs; rather the reliability redispatch invoices should form the basis of information from which the transmission provider determines monthly average reliability redispatch costs.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittee
Request No.: 2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3
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would otherwise be curtailed (at the facility) in the month absent the redispatch.[7] *Transmission providers shall post internal constraint or interface data for the month if any planning redispatch or reliability redispatch is provided during the month, regardless of whether the transmission customer is required to reimburse the transmission provider for those exact costs. Thus, if the transmission customer pays for redispatch pursuant to a negotiated fixed rate, the transmission provider is required to post and calculate the monthly average redispatch costs and the high and low costs in the month even though the transmission provider will bill the customer the fixed rate. The same posting requirement applies if the customer is paying a monthly "higher of" rate.*[8] *The transmission provider shall post this data on OASIS as soon as practical after the end of each month, but no later than when it sends invoices to transmission customers for redispatch-related services. We direct transmission providers to work in conjunction with NAESB to develop this new OASIS functionality and any necessary business practice standards.*

1318 We agree, however, with EEI's recommendation that the Commission delegate to NAESB the responsibility for developing the Standard and Communications Protocols, business practices and OASIS modifications that will be necessary to provide the performance metrics adopted above. NAESB is in the best position to develop the standards and the processes by which the performance metrics are posted.

1378 We interpret Exelon's request that we require all transmission providers to allow transmission customers to link consecutive requests for firm point-to-point transmission service and to evaluate such requests as a single request as asking us to (1) allow transmission customers to require the transmission provider to either grant service for the entire period, deny service for the entire period, or offer the same partial quantity for the entire period and (2) require the transmission provider to consider the full duration of the linked requests when determining reservation priority pursuant to sections 13.2 of the pro forma OATT (short-term firm point-to-point transmission service). We require transmission providers working through NAESB to develop business practice standards to allow a transmission customer to rebid a counteroffer of partial service so the transmission customer is allowed to take the same quantity of service across all linked transmission service requests. Transmission providers need not implement these business practice standards until NAESB develops appropriate standards. We note that the transmission customer should not be required to take the same quantity of service across consecutive transmission service requests, it should simply have the option to do so. On the second issue, we reiterate that, according to existing NAESB business practice standard 001-4.16, the transmission provider is required to consider the full

[7] For example, if reliability redispatch is used by the transmission provider to prevent curtailment of 10 MW of transmission provider or network customer load for 5 hours during the month across flowgate A, the transmission provider would use 50 MWh as the divisor to determine the monthly average cost of redispatch for flowgate A.
[8] This is not a new calculation for the transmission provider because the transmission provider must determine the redispatch costs to know whether to charge higher of the embedded rate or the redispatch costs.

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duration of the linked requests when determining reservation priority pursuant to section 13.2 of the pro forma OATT.

1392 Commenters also suggest changes to the OASIS protocols, including prohibiting transmission customers from changing a request into a pre-confirmed request and requiring OASIS platforms to be accessible on non-Windows/Explorer computers. We believe these issues are best addressed by NAESB.

1401 The Commission generally agrees with those commenters that argue that giving a priority to pre-confirmed requests can increase the efficient utilization of the system by giving priority to customers who are committed to purchase service over those who have not so committed, including customers that submit multiple requests without any intent to take service if each request is granted. However, we are mindful of concerns that doing so could undermine the Commission's desire to promote longer-term uses of the transmission system, disrupt the study process, or disadvantage transmission customers that are not in the position to pre-confirm their requests. As a result, we will modify the NOPR proposal and give priority only to pre-confirmed non-firm point-to-point transmission service requests and short-term firm point-to-point transmission service requests. In addition, longer duration requests for transmission service will continue to have priority over shorter duration requests for transmission service, with pre-confirmation serving as a tie-breaker for requests of equal duration. This policy will still give an advantage to pre-confirmed requests without imposing substantial implementation difficulties or undermining the Commission's goals to encourage longer-term uses of the transmission system. Our revised policy on priority for pre-confirmed requests thus addresses the comments that we should preserve the priority of longer duration requests for transmission service over shorter duration requests for transmission service. For instance, a pre-confirmed daily or hourly request will not preempt a weekly request that has not been pre-confirmed. Pre-confirmed short-term service requests therefore will not have a priority superior to that of long-term service requests that have not been pre-confirmed.

In the FERC Order 890-A under Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 dated December 28, 2007, the Commission made the following conclusions relevant to this recommendation:

142 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission service. While the affiliate posting requirements do not apply to RTOs and ISOs,[9] the requirement to post metrics regarding all transmission service requests remains.[10] We agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission

[9] See Order No. 890 at P 414.
[10] See 18 CFR 37.6(i)(1) and (2).

service request metrics improves the transparency of transmission service request processing by those transmission providers.

718 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission service. While the affiliate posting requirements do not apply to RTOs and ISOs,[11] the requirement to post metrics regarding all transmission service requests remains.[12] We agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission service request metrics improves the transparency of transmission service request processing by those transmission providers.

720 We also affirm the decision to require any transmission provider that processes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines in the pro forma OATT for two consecutive quarters to submit a notification filing to the Commission and post additional performance metrics. We disagree with Washington IOUs that transmission providers should be required to post these metrics only after Commission action on a notification filing. Posting of these additional metrics is not required until two months after the notification filing, giving the Commission time to consider the extenuating circumstances that prevented the transmission provider from processing requested studies on a timely basis. If, upon review of such a filing, the Commission finds that delays were caused by extenuating circumstances, the Commission will not require the transmission provider to continue to post the additional performance metrics. As a result, we expect transmission providers with legitimate extenuating circumstances should not have to post any additional metrics.

721 Similarly, we decline to exempt, as a general matter, studies that are delayed by customer agreement or that are associated with resource planning. The transmission provider can explain the circumstances surrounding any particular delay in its notification filing, which the Commission will review on a case-by-case basis. The process adopted in Order No. 890 is sufficiently flexible to relieve any transmission provider who completes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines for two consecutive quarters from any additional posting requirements, or operational penalties, if the Commission finds the delays were due to extenuating circumstances.

722 The Commission grants rehearing to make several typographical revisions to our rules implementing these posting requirements. In Order No. 890, the Commission stated that short-term and long-term requests for point-to-point service must be aggregated for purposes of the posting requirement in order to ease the burden on transmission providers and in recognition that many customers requesting short-term point-to-point service are

[11] See Order No. 890 at P 414.
[12] See 18 CFR 37.6(i)(1) and (2).

unwilling to pay for studies.[13] The accompanying regulations, however, stated that transmission providers must separately calculate and post metrics for long-term and short-term requests.[14] Upon further consideration, we believe it appropriate to allow, but not require, transmission providers to aggregate requests for long-term and short-term point-to-point service for purposes of the posting requirements. We also clarify that the posting requirements apply to all requests for service, including requests for point-to-point service and requests to designate new network resources or loads. We have revised our regulations to make these requirements more clear.

766 The Commission affirms the decision in Order No. 890 to rely on the NAESB process to develop business practices to govern the processing of transmission requests across multiple transmission systems. We decline to dictate at this time, beyond those principles outlined in Order No. 890, the particular practices that must be implemented. It is more appropriate to allow transmission providers working through NAESB, in the first instance, to consider how best to ensure coordination across multiple systems. It is also appropriate to give NAESB an open timeframe to develop these standards since they must be broad enough to account for the complexities of coordinating multi-system transmission service requests.[15]

786 The Commission affirms the decision in Order No. 890 to give priority based on pre-confirmed status only to short-term firm and long-term non-firm requests for service. As the Commission explained in Order No. 890, the Commission was mindful that the pre-confirmation process could disrupt the transmission study process, undermine longer-term uses of the transmission system, or disadvantage transmission customers that are not in a position to pre-confirm their requests. Restricting the scope of transmission service requests receiving priority for pre-confirmation status to short-term firm and long-term non-firm service requests is necessary in order to minimize disruptions with existing study procedures and power procurement practices in place for long-term firm service requests. We believe this appropriately balances the need to promote long-term transmission rights against the need for increased certainty for customers seeking shorter-term firm and non-firm service.[16] Similarly, we decline to alter the Commission's long-standing policy of giving longer duration requests for service priority over shorter duration requests. To do so would undermine the Commission's goal of encouraging longer term uses of the transmission system.

[13] See id. at P 1309.
[14] 18 CFR 37.6(h)(1).
[15] NAESB has indicated that business practices governing the coordination of service requests across multiple transmission systems are in development. The Commission requests NAESB to keep us informed regarding the status of developing these and other business practices.
[16] As we explain in section III.D.2.c, a customer exercising a rollover right is only required to match a bona fide competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

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787 We clarify in response to E.ON U.S. that, in the event an offer for service on a pre-confirmed request can only be accommodated by additions to the transmission provider's transmission system, the transmission customer may: (1) take a shorter term of service, if available; (2) agree to undertake any upgrades that may be necessary to accommodated the transmission requests; or (3) decline service. The Commission rejects Tenaska's proposal to adopt a deadline prior to which a transmission customer may withdraw a pre-confirmed transmission service request. Providing an opportunity to pre-confirm applications is intended to reduce overloading of transmission study queues and minimize the amount of transmission requests later withdrawn from the study queue, increasing the efficiency of processing transmission service requests. Allowing transmission customers to withdraw pre-confirmed transmission service requests without reason or penalty as suggested by Tenaska would undermine the very reason pre-confirmation status has been given a priority.

788 We decline Southern's request to extend the effectiveness of the reforms regarding pre-confirmation priority pending development of related business practices by NAESB. We believe that Order No. 890 provides sufficient guidance for transmission providers to implement this priority in advance of any standardization efforts that may be undertaken through the NAESB process.

789 With respect to TranServ's question regarding application of the right of first refusal for eligible customers with requests for service over multiple days, the Commission clarifies that a competing request must exceed the total term of service in order to trigger the right of first refusal. Thus, in order for a competing request of equal price to preempt a reservation for three conservative days of daily service, that request must be for four consecutive days or longer and must be received at least one day before the first day of the original customer's three-day term of service.

790 Upon review of tariff provisions governing pre-confirmation of transmission service requests, the Commission has determined that the language adopted in Order No. 890 did not fully capture the Commission's intent of allowing all eligible customers the opportunity to pre-confirm short-term firm and non-firm reservations. As currently written, the language of sections 1.39, 17.2 and 18.2 of the pro forma OATT make pre-confirmation available only to those that are already transmission customers, rather than all eligible customers. The Commission has revised those sections of the pro forma OATT to more accurately reflect our intent that pre-confirmation service should be available to all eligible customers seeking short-term firm and non-firm transmission services.

WEQ 2008 Annual Plan Item 2.a.i.5

Re-Bid Of Partial Service Business Practice Standards on a Single Transmission Provider's System associated with S&CP Requirements

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

WEQ 2008 Annual Plan Items 2.a.i.6

Preconfirmation Priority Business Practice Standards associated with S&CP Requirements

WEQ 2008 Annual Plan Items 2.a.ii.1-3

Group 2: Metrics; Redispatch Cost Posting

1. *Metrics Related to Provision of Transmission Service (Paragraph 413 of Order 890)*
2. *Metrics Related to Performance of Transmission Studies (Paragraphs 1308 through 1317 of Order 890*
3. *Redispatch Cost Posting*
   - *Monthly average cost of redispatch*
   - *A high and low redispatch for the month*

b. Description of Recommendation:

c. Business Purpose:

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Please review the following ESS/ITS Subcommittee meeting minutes:

November 8, 2007

November 20, 2007

December 6, 2007

December 18, 2007

January 15-16, 2008

January 31, 2008

February 11-12, 2008

Please review the Motions Document: http://www.naesb.org/pdf3/weq_ess_its021108a2.doc

Rationale for not allowing increase capacity on re-bids in WEQ-001-4.10.2:

NAESB felt that allowing a customer to request additional capacity as part of the re-bid of partial service capability on OASIS represented a substantive change in the service requested that could

require additional studies, etc and should be addressed through submission of an additional request for capacity and new queue position.

Table 4-3 and limitation on pre-emption to require competing requests to be preconfirmed:

NAESB has limited the competition between a confirmed reservation and a pending request of longer duration or equal duration and higher price (short-term firm only) to require that the pre-empting request must be pre-confirmed. We base this decision in part on the Commission's determination "…in section III.D.2.c, a customer exercising a rollover right is only required to match a *bona fide* competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract." We feel extending the same protection for existing confirmed short-term firm or non-firm reservations to only be at risk for preemption and the requirement to exercise ROFR where there is a "*bona fide* competing commitment", and that such commitment must be provided by the customer's submission of the competing request as pre-confirmed.

A minority opinion was expressed that the "*bona fide* competing commitment "could be met by having the TP and competing customer complete all negotiations and confirm the competing request contingent on all confirmed reservations that will be preempted opting to not match the duration of the competing request. At that point the TP extends the ROFR to the request(s) to be pre-empted. To the extent some existing customers may match and others may not, the competing request would be subject to full or partial displacements based on the amount of capacity that was retained through ROFR by the original customers. This process would NOT require submission of a longer duration request as preconfirmed to be considered a competing request with preemption of confirmed shorter duration reservations.This was found unpalatable by the majority because of the negative ATC during the pendency of the competing request(s) and queue management issues this would raise.

Removal of Standard WEQ-001-4.26:

Order 890 and 890-A have granted pre-confirmation status a higher priority than price. This coupled with revisions to Table 4.3 to require preempting requests to be pre-confirmed warranted removal of WEQ-001-4.26.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

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1. RECOMMENDED ACTION:

___Accept as requested
XX Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

XX Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
XX Modification	XX Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

In the FERC Order 890 (paragraph 1378) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about re-bid of partial service. In FERC Order 890-A under docket Nos. RM-05-17 and RM05-25, the Commission declined to dictate beyond the principles outlined in Order 890 for rebid of partial service. (See paragraph 766).

In the FERC Orders 890 (paragraphs 1392 and 1401) and FERC Order 890-A (paragraphs 786-790) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about preconfirmation priority.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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In the FERC Orders 890 (paragraph 413) and FERC Order 890-A (paragraph 142) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of transmission service metrics.

In the FERC Orders 890 (paragraph 1318) and FERC Order 890-A (paragraphs 718, 720, 721, 722) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of planning study metrics.

In the FERC Order 890 (paragraph 1162) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about redispatch cost postings.

The ESS/ITS has reviewed Orders 890 and 890-A and is recommending adoption of the following standards. The Subcommittee believes this recommendation complies with the guidance provided by the Commission. The subcommittee is recommending moving some of the information link requirements from WEQ 002 to WEQ 001. Finally the Subcommittee is recommending recognition of a Generator Imbalance Ancillary Service.

RECOMMENDED STANDARDS:

The following proposed additions are to be included in the WEQ-001 Definition of Terms. The specific enumeration for each of these definitions will be established by NAESB Staff after ratification.

001-0.xx **Control Area** – As used in NAESB Standards, shall be synonomous with the NERC definition for the Balancing Authority Area.

001-0.yy **Partial Service** - transmission service offered or granted by a Transmission Provider that is for a shorter duration than requested (start-time through stop-time), less capacity than requested, or both.

The following are proposed redlined changes and additions to WEQ-001-2 Standard Terminology for Transmission and Ancillary Services

01-2.1.9 Sliding Yearly

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
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The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year.

For example SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

01-2.1.13 Extended Yearly

The service starts at 00:00 of any date and stops at 00:00 more than one year later.

Deleted: , but must be requested in

The Transmission Provider may limit the service to be in increments of full years or full calendar months.

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The Transmission Provider may limit the start of service to the beginning of a calendar month.

Other Service Attribute Values

Seven ancillary services are pre-defined. Other services may be offered pursuant to filed tariffs.

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001-2.5.4 Energy Imbalance Service (EI) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour and in accordance with Schedule 4 of the pro forma tariff.

…

001-2.5.7 Generator Imbalance Service (GI) - is provided when a difference occurs between the output of a generator located in the Transmission Provider's Control Area and a delivery schedule from that generator to (1) another Control Area or (2) a load within the Transmission Provider's Control Area over a single hour and in accordance with Schedule 9 of the pro forma tariff.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

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The following are proposed redlined changes and additions to WEQ-001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4.1 All reservations and price and/or capacity negotiations shall be conducted on OASIS.

Phase IA Negotiation Process State Transition Diagram

The NAESB OASIS Implementation Guide (WEQ-013) provides a process state diagram to define the Customer and Transmission Provider interactions for negotiating transmission service. This diagram defines the allowable steps in the reservation request, negotiation, approval, confirmation and post-confirmation processes.

001-4.4 RESERVED

001-4.5 RESERVED

Negotiations Without Competing Bids

The following practices are defined in order to enhance consistency of the reservation process across OASIS nodes.

001-4.6 A Transmission Provider/Seller shall respond to a Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-2 Reservation Timing Requirements.** The time limit is measured from the time the request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

I. INVALID
II. DECLINED
III. REFUSED
IV. COUNTEROFFER
V. ACCEPTED
VI. RECEIVED or STUDY (leading to REFUSED, DECLINED, COUNTEROFFER, or ACCEPTED).

001-4.7 Prior to setting a request to ACCEPTED, COUNTEROFFER, or REFUSED a Transmission Provider shall evaluate the appropriate resources and ascertain that the requested transfer capability is (or is not) available.

Deleted: most current version of the

Deleted: Standards and Communications Protocol for Open Access Same-Time Information Systems

Deleted: and

Deleted: The state diagram appearing in Exhibit 4-1 in Section 4.2.10.2 of the most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems (Standard WEQ-002) constitutes a recommended business practice in OASIS Phase IA.

Deleted: The definitions in Section 4.2.10.2 of the most current version of the NAESB Standards and Communications Protocol for Open Access Same-Time Information Systems (Standard WEQ-002) (status values) shall be applied to the process states in OASIS Phase IA.

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001-4.7.1 If the Transmission Provider determines there is insufficient transfer capability available to grant the Transmission Customer's request and there is no obligation to provide Partial Service, the Transmission Provider may respond by setting the request status to REFUSED.

001-4.7.2 If the Transmission Provider determines there is sufficient transfer capability available to grant the Transmission Customer's request and the customer's bid price is at least equal to the provider's current posted offer price over time and all other Transmission Provider requirements have been met, the Transmission Provider shall respond by setting the request status to ACCEPTED.

001-4.7.2.1 If the Transmission Customer does not specify a bid price, the Transmission Provider shall consider the bid price to be equal to the current posted offer price when evaluating the request.

001-4.7.3 The Transmission Provider shall use the status of COUNTEROFFER to initiate the negotiation of requested capacity (Partial Service) and/or price.

001-4.7.3.1 The Transmission Provider is not required to provide short-term Partial Service in response to a Long-Term request.

001-4.7.3.2 If the available transfer capability can support only a portion of the total capacity requested by the Transmission Customer and the Transmission Provider is obligated or elects to offer what limited capability is available to the customer, the Transmission Provider shall notify the Transmission Customer on OASIS by setting the amount of capacity being offered over time in the transmission request and updating the request status to COUNTEROFFER.

001-4.7.3.3 If the Transmission Customer is attempting to negotiate price by submission of a bid price that is lower or higher than the current posted offer price, and the Transmission Provider elects to not negotiate price, the Transmission Provider shall notify the customer by setting the request status to DECLINED.

001-4.7.3.4 If the Transmission Provider elects to (continue to) negotiate price, the provider shall update the offer price over time in the transmission request, indicate whether the price being negotiated is higher or lower than the posted price, and set the request status to COUNTEROFFER.

001-4.7.3.5 If both capacity and price are being negotiated, that negotiation may be performed simultaneously.

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001-4.8 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

Deleted: For any request that is REFUSED or INVALID, the Transmission Provider must indicate in the SELLER_COMMENTS field the reason the request was refused or invalid.

001-4.9 The Customer may change a request from QUEUED, RECEIVED, STUDY, COUNTEROFFER, REBID, or ACCEPTED to WITHDRAWN at any time prior to CONFIRMED except as follows.

001-4.9.1 Preconfirmed requests for short-term firm and non-firm point-to-point service shall not be allowed to be WITHDRAWN by the Customer unless counteroffered by the Transmission Provider, after which the Customer shall be allowed to withdraw the request.

001-4.9.2 For a preconfirmed request for short-term firm point-to-point service, if the Transmission Provider has notified the Customer that a System Impact Study is needed, the Customer may, prior to execution of the System Impact Study Agreement, request that the Transmission Provider void (status of DECLINED) the request. The Transmission Provider must honor such request.

001-4.9.3 In the case of an inadvertent error, the Customer may in the very near term request that the Transmission Provider void (status of ANNULLED) a pre-confirmed request/reservation for short-term firm or non-firm point-to-point service. Honoring such a request is at the discretion of the Transmission Provider.

001-4.10 From ACCEPTED or COUNTEROFFER, a Customer may change the status to CONFIRMED, REBID or WITHDRAWN. The Customer has the amount of time designated as Customer Confirmation Time Limit in Table 4-2 Reservation Timing Requirements to change the state of the request to CONFIRMED. The Customer time limit is measured from the first time the request is moved to ACCEPTED or COUNTEROFFER, and is not reset with subsequent iterations of negotiation.

001-4.10.1 The Transmission Customer shall use the request status of REBID to initiate or continue the negotiation of price and/or capacity.

001-4.10.2 The Transmission Customer may negotiate for a lower amount of transmission capacity by updating the capacity requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID. For example, the Customer may want to coordinate the level of transmission service purchased across multiple Transmission Providers or other such purposes. Negotiation for a higher amount of transmission capacity shall not be allowed. A customer

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seeking additional capacity must submit a new request which will be assigned a new queue position.

001-4.10.3 The Transmission Customer may negotiate for a higher or lower price by updating the bid price requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID.

001-4.10.4 The Transmission Customer shall positively acknowledge and agree to both the price and capacity over time by setting the bid price and requested capacity equal to the Transmission Provider's offer price and granted capacity prior to confirmation of the transmission service request.

001-4.12 Should the Customer elect to initiate or continue the negotiation of price and/or capacity by moving a transmission service request to REBID, the Transmission Provider shall respond by taking the request to a DECLINED, SUPERSEDED, ACCEPTED, or COUNTEROFFER state within the Provider Counter Time Limit, specified in **Table 4-2 Reservation Timing Requirements.** The Transmission Provider response time is measured from the most recent REBID time.

Deleted: respond to a Transmission Provider's COUNTEROFFER

001-4.12.1 The Transmission Provider shall positively acknowledge and agree to both the price and capacity over time by setting the offer price and granted capacity equal to the Transmission Customer's bid price and requested capacity prior to acceptance of the transmission service request.

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001-4.13 The following timing requirements shall apply to all Point-to-Point transmission service requests:

TABLE 4-2
Request Timing Requirements

Deleted: Reservation

Class	Service Increment	Time QUEUED Prior to Start	Provider Evaluation Time Limit[1]	Customer Confirmation Time Limit[2] after ACCEPTED or COUNTEROFFER[3]	Provider Counter Time Limit after REBID[4]
Non-Firm	Hourly	<1 hour	Best effort	5 minutes	5 minutes
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes	10 minutes
Non-Firm	Daily	N/A	30 minutes	2 hours	10 minutes
Non-Firm	Weekly	N/A	4 hours	24 hours	4 hours
Non-Firm	Monthly	N/A	2 days [5]	24 hours	4 hours
Firm	Daily	< 24 hours	Best effort	2 hours	30 minutes
Firm	Daily	N/A	30 days[6]	24 hours	4 hours
Firm	Weekly	N/A	30 days[6]	48 hours	4 hours
Firm	Monthly	N/A	30 days[6]	4 days	4 hours
Firm	Yearly	60 days [7]	30 days	15 days	4 hours

Notes for Table 4-2:

[1] Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.
[2] Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override pre-exemption deadlines.
[3] Measurement starts at the time the request is first moved to either ACCEPTED or COUNTEROFFER. The time limit does not reset on subsequent changes of state.
[4] Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.
[5] Days are defined as calendar days.
[6] Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers shall make best efforts to respond within 72

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hours, or prior to the scheduling deadline, whichever is earlier, to a request for Daily Firm Service received during period 2-30 days ahead of the service start time.

[7] Subject to Section 17.1 of the pro forma tariff, whenever feasible and on a nondiscriminatory basis, transmission providers should accommodate requests made with less than 60 days notice.

Negotiations with Competing Bids for Constrained Resources

001-4.14 The following are the relative queue priorities of Service Request Tiers[1]. The priorities refer only to negotiation of service and do not refer to curtailment priority.

001-4.15 Reservations and requests shall be handled in a first-come-first-served order based on QUEUE_TIME. Within a given Service Request Tier, with the exception of Service Request Tier 1, where there are competing requests for a constrained resource, the following request attributes shall be used to determine the relative priority for granting of service.

I.....Service Increment (Monthly, Weekly, Daily, Hourly)
II.....Duration (the amount of time between the Start Date and the Stop Date)
III.....Pre-confirmation Status
IV.....Price
V.....Queue Time

001-4.16 Table 4-3 describes the relative queue priorities of competing service requests and reservations, with respect to the conditions whereby a subsequent request preempts a previously queued request or reservation, and the rules for offering right-of-first-refusal. If two competing requests do no meet the specific criteria listed in Table 4-3, the requests shall be evaluated and processed in a first-come-first-served order based on QUEUE_TIME. While the table indicates the relative priorities of two competing requests, it also is intended to be applied in the more general case of more than two competing requests.

[1]Note: The term Tier is introduced to avoid confusion with existing terms such as TS_CLASS.

Deleted: Competing bids exist when multiple requests cannot be accommodated due to a lack of available transmission capacity. One general rule is that OASIS requests should be evaluated and granted priority on a first-come-first-served basis established by OASIS QUEUED time. Thus, the first to request service should get it, all else being equal.¶
¶
Exceptions to this first-come-first-served basis occur when there are competing requests for limited resources and the requests have different priorities established by FERC regulations and filed tariffs. Prior to the introduction of price negotiations, the attribute values that have served as a basis for determining priority include:¶
¶
I. . Type (Network, Point-to-point)¶
II. . Class (Firm, Non-Firm)¶
III. . Increment (Hourly, Daily, Weekly, Monthly, Yearly)¶
IV. . Duration (the amount of time between the Start Date and the Stop Date)¶
V. . Amount (the MW amount)¶
¶
Under a negotiation model, price can also be used as an attribute for determining priority. The negotiation process increases the possibility that a Transmission Provider will be evaluating multiple requests that cannot all be accommodated due to limited resources. In this scenario, it is possible that an unconfirmed request with an earlier QUEUED time could be preempted (SUPERSEDED). For this to occur, the subsequent request would be of higher priority or of greater price.¶

Deleted: Consistent with regulations and filed tariffs, t

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Table 4-3
Priorities For Competing Reservations And Requests

ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
1	Tier 1: Long-term Firm, Native Load, and Network Firm	N/A - Not preempted by a subsequent request.	N/A
2	Tier 2: Pending (not confirmed) or confirmed but conditional Short-term Firm	Tier 1: Long-term Firm, Native Load, and Network Firm, Once Request 1 is unconditional, it may not be preempted.	No
3a	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment.	No
3b	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	No
3c	Tier 2: Pending pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] and higher price	No
3d	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	No
3e	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment and of equal or longer duration[1]	No
3f	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	Yes
3g	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	Yes
3h	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] and higher price.	Yes
4	Tier 3: Network Service From Non-Designated Resources	Tiers 1 and 2: All Firm (including Network).	No
5	Tier 4: All Non-Firm PTP	Tiers 1 and 2: All Firm (including Network).	No
6	Tier 4: All Non-Firm PTP	Tier 3: Network Service from Non-Designated Resources.	No
7	RESERVED		
7a	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment.	No

Deleted: while request 1 is conditional.

Deleted: Tier 4: All Non-Firm PTP

Deleted: Tier 4: Non-firm PTP of a longer term (duration)[1]. Except in the last hour prior to start (See Standard 4.23).

Deleted: Yes[2]

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ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
7b	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	No
7c	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration and higher price	No
7d	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment	No
7e	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment and of equal or longer duration[1]	No
7f	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration and higher price	No
7g	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm of higher service increment	Yes
7h	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	Yes
8	RESERVED		
9	Tier 5: Non-firm PTP Service over secondary receipt and delivery points.	Tiers 1 through 4	No
10	Tier 6: Non-firm Next Hour Market Service	Tiers 1 through 5	No

Notes for Table 4-3:

[1] Longer duration means more multiples of the same SERVICE_INCREMENT in a single request. Each such multiple must be at the same level of capacity. For example, a single request for three consecutive days shall be considered longer duration than a single request for two consecutive days. Also, multiple service requests or reservations may not be grouped for the purpose of determining duration. For example, three separate one-day requests for three consecutive days of service shall not be considered longer duration than a single request for two consecutive days.

001-4.17 For a request or reservation that is Superseded or Displaced, respectively, the Transmission Provider must indicate the Assignment Reference Number of the competing request and the reason for denial of service in the SELLER_COMMENTS field.

Deleted: Tier 4: All Non-firm PTP

Deleted: Tier 4: Non-firm PTP of equal term (duration) [1] and higher price, when Request 1 is still unconfirmed and Request 2 is received pre-confirmed. A confirmed non-firm PTP may not be preembpted for another non-firm request of equal duration. (See Standards 4.22 and 4.25.)

Deleted: Yes[3]

Deleted: Tier 5 can be preempted by

Deleted: Tier 6 can be preempted by

Deleted: [1] Longer duration, in addition to being higher SERVICE_INCREMENT (i.e., WEEKLY has priority over DAILY), also may mean more multiples of the same SERVICE_INCREMENT (i.e., 3 days may have priority over 2 days). Multiple service increments must be at the same level of capacity. ¶
[2] Right of first refusal when a subsequent reuest is received of a longer duration applies only if the first request is confirmed.¶
[3] Right of first refusal when a subsequent reuest is received ofan equal duration and higher price applies only when the first request in unconfirmed and the subsequent request is received pre-confirmed (see Standards 4.22 and 4.26)

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001-4.18 Given competing requests for a limited resource and a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from any pending (not confirmed) state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-3. These state changes require dynamic notification to the Customer if the Customer has requested dynamic notification on OASIS.

Deleted: an ACCEPTED or COUNTEROFFER

001-4.26 RESERVED

Deleted: If during a negotiation of service (i.e., prior to Customer confirmation) a subsequent pre-confirmed request for service over the same limited resource of equal duration but higher price is received, the Transmission Provider must COUNTEROFFER the price of service on the prior COUNTEROFFER or ACCEPTED price to match the competing offer, in order to give the first Customer an opportunity to match the offer. This practice must be implemented in a non-discriminatory manner.

001-4.27 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

Deleted: Whenever a request or reservation is set to the state of Invalid, Refused, Declined, Superseded, Retracted, Annulled, or Displaced, the Transmission Provider or Seller shall enter the reason for the action in the SELLER_COMMENTS field.

The following are proposed additions to the WEQ-001 OASIS Standards

001-13 OASIS GENERAL POSTING STANDARDS

001-13.1 OASIS HOME PAGE

The Transmission Provider shall establish the following HTML hyperlinks to standardized information postings of a general (i.e., non-template) nature located on the Transmission Provider's OASIS Home Page at their registered OASIS URL address. These links must appear as named and in the following order:

NAESB Home Page

Standards of Conduct

Performance Metrics

Business Practices, Waivers, and Exemptions

ATC Information

Nothing in this standard shall preclude the Transmission Provider from establishing additional hyperlinks or making additional content available on their OASIS Home Page.

001-13.1.1 NAESB HOME PAGE LINK

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The "***NAESB Home Page"*** hyperlink shall direct an OASIS user to the NAESB Home Page.

001-13.1.2 STANDARDS OF CONDUCT LINK

The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g,* Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g,* Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the "***Standards of Conduct***" link displayed on the Transmission Provider's OASIS Home Page.

Emergency Circumstances Deviations (§358.4(a)(2))

Marketing and Energy Affiliate List (§358.4(b)(1))

Shared Facilities (§358.4(b)(2))

Organizational Charts and Job Descriptions (§358.4(b)(3)(i))

Common Employees (§358.4(b)(3)(iii))

Potential Merger Partners (§358.4(b)(3)(v))

Transfers[2] (§358.4(c))

Information Disclosure[3] (§358.5(b) (3))

Voluntary Consent to Share Non-Affiliated Customer Information (§358.5(b)(4))

Discretionary Actions under Tariff [4] (§358.5(c)(4))

Discounts[5] (§358.5(d))

Chief Compliance Officer (§358.4(e)(6))

[2] According to WEQ 002-4.3.10.4 a template is required for this item.
[3] According to WEQ 002-4.3.10.6 a template is required for this item.
[4] According to WEQ 002-4.3.10.5 a template is required for this item.
[5] According to WEQ 002-4.3.2.1 a template is required for this item.

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Written Procedures for Implementation (§358.4 (e)(3))

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to Standards of Conduct. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to WEQ 002-3.1

001-13.1.3 PERFORMANCE METRICS LINK

The following types of information, as required by FERC Statutes and Regulations (18 CFR 37.6(h), 18CFR 37.6(i), and 18 CFR 37.6(j)(2)) shall be accessible from the ***"Performance Metrics"*** link.

a. The Transmission Provider shall establish a link entitled ***"Transmission Study Metrics"*** to view the information as required by 18 CFR 37.6(h). The information must be made available on a calendar quarterly basis and be posted within 15 days of the end of the quarter. The information must remain available on OASIS for three years. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

b. The Transmission Provider shall establish a link entitled ***"Transmission Service Request Metrics"*** to view the information as required by 18 CFR 37.6(i). The information must be made available on a monthly basis and be posted by the 15th day of the subsequent month. The information must remain available for download on OASIS for three months. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

c. The Transmission Provider shall establish a link entitled ***"Redispatch Cost"*** to view the information as required by 18 CFR 37.6(j)(2). The data must be made available on a monthly basis and be posted as soon as practical after the end of each month, but no later than when the invoice for redispatch-related services is sent to the Transmission Customer. The information must remain available for download on OASIS for three months. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

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001-13.1.4 BUSINESS PRACTICES, WAIVERS, AND EXEMPTIONS LINK

The Transmission Provider shall post information related to 1) any provider specific business practices, 2) any waivers or exemptions granted from any of the OASIS requirements or standards, and 3) any other pertinent information related to the conduct of business with the Transmission Provider.

01-13.1.5 **ATC INFORMATION LINK**

Hold for future development by BPS/ESS/ITS to include NERC related documents and the required CBM/TRM statements. Prior version stated in WEQ 002-4.5.1:

Information related to the Transmission Provider's methodology for computing and application of Capacity Benefit Margin (CBM) and Transmission Reliability Margin (TRM). If the Transmission Provider does not use CBM or TRM in their assessment of Available Transmission Capability (ATC), that information shall also be in INFO.HTM.

…

The following are proposed redlined changes to WEQ-002-3.4 PROVIDER UPDATING REQUIREMENTS

002-3.4 PROVIDER UPDATING REQUIREMENTS

The following are the Provider update requirements:

a. **Provider Posting of TS Information**: Each Provider (including Secondary Providers and Value-Added Providers) shall be responsible for writing (posting) and updating TS Information on their OASIS Node. No User shall be permitted to modify a Provider's Information.

b. **General Postings**

(i) **INFO.HTM:** Each Provider shall provide general information on how to use their node and describe all special aspects, such as line losses, congestion charges and assistance. The address for the directory of this information shall be INFO.HTM (case sensitive), an HTML web page, linked to the Provider's registered URL address. See WEQ 002-4.5 for information required to be on the web page INFO.HTM.

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(ii) **OASIS Home Page:** NAESB Standard WEQ-001-13 establishes specific HTML hyperlinks which must be made available on the Transmission Provider's OASIS home page at their registered URL address.

…

The following are redlined changes to WEQ-002-4.5 GENERAL POSTINGS

002-4.5 GENERAL POSTINGS

002-4.5.1 INFO.HTM

When a regulatory order requires informational postings on OASIS and there is no OASIS S&CP template to support the postings or it is deemed inappropriate to use a template, or the location of the posting has not been specified in WEQ-001-13, there shall be a reference in INFO.HTM to the required information, including, but not limited to, references to the following:

- A common source of interconnection wide curtailment and interruption information, such as the NERC Transmission Loading Relief (TLR) web site.
- The location of the list of system studies conducted.
- Information on requesting the text file of the tariffs and service agreements.

For the purposes of this section, any link to required informational postings that can be accessed from INFO.HTM would be considered to have met the OASIS posting requirements, provided that the linked information meets all other OASIS accessibility requirements.

002-4.5.2 OASIS Home Page The NAESB WEQ-001-13 Standards establishes specific informational postings that must be accessible from the Transmission Provider's OASIS Home Page.

The following are proposed redlined changes to WEQ-013-2.2 Transaction Status to reflect the addition of WEQ-001- 4.9.3. Note: The definition of ANNULLED for the Data Dictionary Element Name Status will also be changed to reflect the addtion of WEQ-001-4.9.3.

Deleted: Information Under Standards of Conduct Link

Deleted: ¶

Deleted: The Transmission Provider shall establish a link entitled "Standards of Conduct," located on the OASIS home page at the Transmission Provider's registered URL address.¶
¶
The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g,* Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g,* Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the Standards of Conduct link.¶
¶
Emergency Circumstances Deviations (§358.4(a)(2))¶
¶
Marketing and Energy Affiliate List (§358.4(b)(1))¶
¶
Shared Facilities (§358.4(b)(2))¶
¶
Organizational Charts and Job Descriptions (§358.4(b)(3)(i))¶
¶
Common Employees (§358.4(b)(3)(iii))¶
¶
Potential Merger Partners (§358.4(b)(3)(v))¶
¶
Transfers[6] (§358.4(c))¶
¶
Information Disclosure[7] (§358.5(b)(3))¶
¶
Voluntary Consent to Share Non-Affiliated Customer Information (§358.5(b)(4))¶
¶
Discretionary Actions under Tariff[8] (§358.5(c)(4))¶
¶
Discounts[9] (§358.5(d))¶
¶
Chief Compliance Officer (§358.4(e)(6))¶

... [1]

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Requesters:	**ESS/ITS Subcommittee**
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013-2.2 **Transaction Status**
ANNULLED = assigned by the Seller when, by mutual agreement with the Customer, a reservation or pre-confirmed request is to be voided, or assigned unilaterally by the Primary Provider when a resale reservation is to be voided. (Final state).

4. SUPPORTING DOCUMENTATION

a. Description of Request:
In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions relevant to recommendation:

> *413 The Commission adopts the proposed requirement to post on OASIS metrics related to the provision of transmission service under the OATT. Specifically, transmission providers must post (1) the number of affiliate versus non-affiliate requests for transmission service that have been rejected and (2) the number of affiliate versus non-affiliate requests for transmission service that have been made. This posting must detail the length of service request (e.g., short-term or long-term) and the type of service requested (e.g., firm point-to-point, non-firm point-to-point or network service). The Commission also will require transmission providers to post their underlying load forecast assumptions for all ATC calculations and, to post on a daily basis, their actual daily peak load for the prior day. The Commission directs transmission providers to work through NAESB to develop standards for consistent methods of posting the new requirements on OASIS.*

> *1162 Accordingly, to provide greater availability of redispatch information, the Commission adopts certain additional posting requirements for transmission providers. Specifically, we direct each transmission provider to post on OASIS its monthly average cost of redispatch for each internal congested transmission facility or interface over which it provides redispatch service using planning redispatch or reliability redispatch under the pro forma OATT.[10] Additionally, to demonstrate the range of redispatch costs each month, the Commission directs transmission providers to post a high and low redispatch cost for the month for each of these same transmission constraints. The transmission provider shall calculate the monthly average cost in $/MWh for each congested*

[10] The relevant reliability redispatch costs for posting purposes are those costs the transmission provider invoices network customers based on a load ratio share pursuant to section 33.3 of the pro forma OATT. The transmission provider need not perform new calculations of out-of-merit dispatch costs; rather the reliability redispatch invoices should form the basis of information from which the transmission provider determines monthly average reliability redispatch costs.

transmission facility by dividing monthly total redispatch costs (at the facility) by the total MWhs that would otherwise be curtailed (at the facility) in the month absent the redispatch.[11] Transmission providers shall post internal constraint or interface data for the month if any planning redispatch or reliability redispatch is provided during the month, regardless of whether the transmission customer is required to reimburse the transmission provider for those exact costs. Thus, if the transmission customer pays for redispatch pursuant to a negotiated fixed rate, the transmission provider is required to post and calculate the monthly average redispatch costs and the high and low costs in the month even though the transmission provider will bill the customer the fixed rate. The same posting requirement applies if the customer is paying a monthly "higher of" rate.[12] The transmission provider shall post this data on OASIS as soon as practical after the end of each month, but no later than when it sends invoices to transmission customers for redispatch-related services. We direct transmission providers to work in conjunction with NAESB to develop this new OASIS functionality and any necessary business practice standards.

1318 We agree, however, with EEI's recommendation that the Commission delegate to NAESB the responsibility for developing the Standard and Communications Protocols, business practices and OASIS modifications that will be necessary to provide the performance metrics adopted above. NAESB is in the best position to develop the standards and the processes by which the performance metrics are posted.

1378 We interpret Exelon's request that we require all transmission providers to allow transmission customers to link consecutive requests for firm point-to-point transmission service and to evaluate such requests as a single request as asking us to (1) allow transmission customers to require the transmission provider to either grant service for the entire period, deny service for the entire period, or offer the same partial quantity for the entire period and (2) require the transmission provider to consider the full duration of the linked requests when determining reservation priority pursuant to sections 13.2 of the pro forma OATT (short-term firm point-to-point transmission service). We require transmission providers working through NAESB to develop business practice standards to allow a transmission customer to rebid a counteroffer of partial service so the transmission customer is allowed to take the same quantity of service across all linked transmission service requests. Transmission providers need not implement these business practice standards until NAESB develops appropriate standards. We note that the transmission customer should not be required to take the same quantity of service across consecutive transmission service requests, it should simply have the option to do so. On the second issue, we reiterate that, according to existing NAESB business

[11] For example, if reliability redispatch is used by the transmission provider to prevent curtailment of 10 MW of transmission provider or network customer load for 5 hours during the month across flowgate A, the transmission provider would use 50 MWh as the divisor to determine the monthly average cost of redispatch for flowgate A.
[12] This is not a new calculation for the transmission provider because the transmission provider must determine the redispatch costs to know whether to charge higher of the embedded rate or the redispatch costs.

practice standard 001-4.16, the transmission provider is required to consider the full duration of the linked requests when determining reservation priority pursuant to section 13.2 of the pro forma OATT.

1392 Commenters also suggest changes to the OASIS protocols, including prohibiting transmission customers from changing a request into a pre-confirmed request and requiring OASIS platforms to be accessible on non-Windows/Explorer computers. We believe these issues are best addressed by NAESB.

1401 The Commission generally agrees with those commenters that argue that giving a priority to pre-confirmed requests can increase the efficient utilization of the system by giving priority to customers who are committed to purchase service over those who have not so committed, including customers that submit multiple requests without any intent to take service if each request is granted. However, we are mindful of concerns that doing so could undermine the Commission's desire to promote longer-term uses of the transmission system, disrupt the study process, or disadvantage transmission customers that are not in the position to pre-confirm their requests. As a result, we will modify the NOPR proposal and give priority only to pre-confirmed non-firm point-to-point transmission service requests and short-term firm point-to-point transmission service requests. In addition, longer duration requests for transmission service will continue to have priority over shorter duration requests for transmission service, with pre-confirmation serving as a tie-breaker for requests of equal duration. This policy will still give an advantage to pre-confirmed requests without imposing substantial implementation difficulties or undermining the Commission's goals to encourage longer-term uses of the transmission system. Our revised policy on priority for pre-confirmed requests thus addresses the comments that we should preserve the priority of longer duration requests for transmission service over shorter duration requests for transmission service. For instance, a pre-confirmed daily or hourly request will not preempt a weekly request that has not been pre-confirmed. Pre-confirmed short-term service requests therefore will not have a priority superior to that of long-term service requests that have not been pre-confirmed.

In the FERC Order 890-A under Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 dated December 28, 2007, the Commission made the following conclusions relevant to this recommendation:

142 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission service. While the affiliate posting requirements do not apply to RTOs and ISOs,[13] the requirement to post metrics regarding all transmission service requests remains.[14] We

[13] See Order No. 890 at P 414.
[14] See 18 CFR 37.6(i)(1) and (2).

agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission service request metrics improves the transparency of transmission service request processing by those transmission providers.

718 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission service. While the affiliate posting requirements do not apply to RTOs and ISOs,[15] the requirement to post metrics regarding all transmission service requests remains.[16] We agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission service request metrics improves the transparency of transmission service request processing by those transmission providers.

720 We also affirm the decision to require any transmission provider that processes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines in the pro forma OATT for two consecutive quarters to submit a notification filing to the Commission and post additional performance metrics. We disagree with Washington IOUs that transmission providers should be required to post these metrics only after Commission action on a notification filing. Posting of these additional metrics is not required until two months after the notification filing, giving the Commission time to consider the extenuating circumstances that prevented the transmission provider from processing requested studies on a timely basis. If, upon review of such a filing, the Commission finds that delays were caused by extenuating circumstances, the Commission will not require the transmission provider to continue to post the additional performance metrics. As a result, we expect transmission providers with legitimate extenuating circumstances should not have to post any additional metrics.

721 Similarly, we decline to exempt, as a general matter, studies that are delayed by customer agreement or that are associated with resource planning. The transmission provider can explain the circumstances surrounding any particular delay in its notification filing, which the Commission will review on a case-by-case basis. The process adopted in Order No. 890 is sufficiently flexible to relieve any transmission provider who completes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines for two consecutive quarters from any additional posting requirements, or operational penalties, if the Commission finds the delays were due to extenuating circumstances.

722 The Commission grants rehearing to make several typographical revisions to our rules implementing these posting requirements. In Order No. 890, the Commission stated that short-term and long-term requests for point-to-point service must be aggregated for purposes of the posting requirement in order to ease the burden on transmission providers

[15] See Order No. 890 at P 414.
[16] See 18 CFR 37.6(i)(1) and (2).

and in recognition that many customers requesting short-term point-to-point service are unwilling to pay for studies.[17] The accompanying regulations, however, stated that transmission providers must separately calculate and post metrics for long-term and short-term requests.[18] Upon further consideration, we believe it appropriate to allow, but not require, transmission providers to aggregate requests for long-term and short-term point-to-point service for purposes of the posting requirements. We also clarify that the posting requirements apply to all requests for service, including requests for point-to-point service and requests to designate new network resources or loads. We have revised our regulations to make these requirements more clear.

766 The Commission affirms the decision in Order No. 890 to rely on the NAESB process to develop business practices to govern the processing of transmission requests across multiple transmission systems. We decline to dictate at this time, beyond those principles outlined in Order No. 890, the particular practices that must be implemented. It is more appropriate to allow transmission providers working through NAESB, in the first instance, to consider how best to ensure coordination across multiple systems. It is also appropriate to give NAESB an open timeframe to develop these standards since they must be broad enough to account for the complexities of coordinating multi-system transmission service requests.[19]

786 The Commission affirms the decision in Order No. 890 to give priority based on pre-confirmed status only to short-term firm and long-term non-firm requests for service. As the Commission explained in Order No. 890, the Commission was mindful that the pre-confirmation process could disrupt the transmission study process, undermine longer-term uses of the transmission system, or disadvantage transmission customers that are not in a position to pre-confirm their requests. Restricting the scope of transmission service requests receiving priority for pre-confirmation status to short-term firm and long-term non-firm service requests is necessary in order to minimize disruptions with existing study procedures and power procurement practices in place for long-term firm service requests. We believe this appropriately balances the need to promote long-term transmission rights against the need for increased certainty for customers seeking shorter-term firm and non-firm service.[20] Similarly, we decline to alter the Commission's long-standing policy of giving longer duration requests for service priority over shorter duration requests. To do so would undermine the Commission's goal of encouraging longer term uses of the transmission system.

[17] See id. at P 1309.
[18] 18 CFR 37.6(h)(1).
[19] NAESB has indicated that business practices governing the coordination of service requests across multiple transmission systems are in development. The Commission requests NAESB to keep us informed regarding the status of developing these and other business practices.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: ESS/ITS Subcommittee
Request No.: 2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3
Request Title: WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting

787 We clarify in response to E.ON U.S. that, in the event an offer for service on a pre-confirmed request can only be accommodated by additions to the transmission provider's transmission system, the transmission customer may: (1) take a shorter term of service, if available; (2) agree to undertake any upgrades that may be necessary to accommodated the transmission requests; or (3) decline service. The Commission rejects Tenaska's proposal to adopt a deadline prior to which a transmission customer may withdraw a pre-confirmed transmission service request. Providing an opportunity to pre-confirm applications is intended to reduce overloading of transmission study queues and minimize the amount of transmission requests later withdrawn from the study queue, increasing the efficiency of processing transmission service requests. Allowing transmission customers to withdraw pre-confirmed transmission service requests without reason or penalty as suggested by Tenaska would undermine the very reason pre-confirmation status has been given a priority.

788 We decline Southern's request to extend the effectiveness of the reforms regarding pre-confirmation priority pending development of related business practices by NAESB. We believe that Order No. 890 provides sufficient guidance for transmission providers to implement this priority in advance of any standardization efforts that may be undertaken through the NAESB process.

789 With respect to TranServ's question regarding application of the right of first refusal for eligible customers with requests for service over multiple days, the Commission clarifies that a competing request must exceed the total term of service in order to trigger the right of first refusal. Thus, in order for a competing request of equal price to preempt a reservation for three conservative days of daily service, that request must be for four consecutive days or longer and must be received at least one day before the first day of the original customer's three-day term of service.

790 Upon review of tariff provisions governing pre-confirmation of transmission service requests, the Commission has determined that the language adopted in Order No. 890 did not fully capture the Commission's intent of allowing all eligible customers the opportunity to pre-confirm short-term firm and non-firm reservations. As currently written, the language of sections 1.39, 17.2 and 18.2 of the pro forma OATT make pre-confirmation available only to those that are already transmission customers, rather than all eligible customers. The Commission has revised those sections of the pro forma OATT to more accurately reflect our intent that pre-confirmation service should be available to all eligible customers seeking short-term firm and non-firm transmission services.

[20] As we explain in section III.D.2.c, a customer exercising a rollover right is only required to match a bona fide competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS Subcommittee**

Request No.: **2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**

Request Title: **WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

WEQ 2008 Annual Plan Item 2.a.i.5

Re-Bid Of Partial Service Business Practice Standards on a Single Transmission Provider's System associated with S&CP Requirements

WEQ 2008 Annual Plan Items 2.a.i.6

Preconfirmation Priority Business Practice Standards associated with S&CP Requirements

WEQ 2008 Annual Plan Items 2.a.ii.1-3

Group 2: Metrics; Redispatch Cost Posting

1. *Metrics Related to Provision of Transmission Service (Paragraph 413 of Order 890)*
2. *Metrics Related to Performance of Transmission Studies (Paragraphs 1308 through 1317 of Order 890*
3. *Redispatch Cost Posting*
   - *Monthly average cost of redispatch*
   - *A high and low redispatch for the month*

b. Description of Recommendation:

c. Business Purpose:

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Please review the following ESS/ITS Subcommittee meeting minutes:

November 8, 2007

November 20, 2007

December 6, 2007

December 18, 2007

January 15-16, 2008

January 31, 2008

February 11-12, 2008

Please review the Motions Document: http://www.naesb.org/pdf3/weq_ess_its021108a2.doc

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

Rationale for not allowing increase capacity on re-bids in WEQ-001-4.10.2:

NAESB felt that allowing a customer to request additional capacity as part of the re-bid of partial service capability on OASIS represented a substantive change in the service requested that could require additional studies, etc and should be addressed through submission of an additional request for capacity and new queue position.

Table 4-3 and limitation on pre-emption to require competing requests to be preconfirmed:

NAESB has limited the competition between a confirmed reservation and a pending request of longer duration or equal duration and higher price (short-term firm only) to require that the pre-empting request must be pre-confirmed. We base this decision in part on the Commission's determination "…in section III.D.2.c, a customer exercising a rollover right is only required to match a *bona fide* competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract." We feel extending the same protection for existing confirmed short-term firm or non-firm reservations to only be at risk for preemption and the requirement to exercise ROFR where there is a "*bona fide* competing commitment", and that such commitment must be provided by the customer's submission of the competing request as pre-confirmed.

A minority opinion was expressed that the "*bona fide* competing commitment "could be met by having the TP and competing customer complete all negotiations and confirm the competing request contingent on all confirmed reservations that will be preempted opting to not match the duration of the competing request. At that point the TP extends the ROFR to the request(s) to be pre-empted. To the extent some existing customers may match and others may not, the competing request would be subject to full or partial displacements based on the amount of capacity that was retained through ROFR by the original customers. This process would NOT require submission of a longer duration request as preconfirmed to be considered a competing request with preemption of confirmed shorter duration reservations.This was found unpalatable by the majority because of the negative ATC during the pendency of the competing request(s) and queue management issues this would raise.

Removal of Standard WEQ-001-4.26:

Order 890 and 890-A have granted pre-confirmation status a higher priority than price. This coupled with revisions to Table 4.3 to require preempting requests to be pre-confirmed warranted removal of WEQ-001-4.26.

Page 16: [1] Deleted **ESkiba** **2/20/2008 10:46:00 AM**

The Transmission Provider shall establish a link entitled "Standards of Conduct," located on the OASIS home page at the Transmission Provider's registered URL address.

The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g,* Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g,* Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the Standards of Conduct link.

Emergency Circumstances Deviations (§358.4(a)(2))

Marketing and Energy Affiliate List (§358.4(b)(1))

Shared Facilities (§358.4(b)(2))

Organizational Charts and Job Descriptions (§358.4(b)(3)(i))

Common Employees (§358.4(b)(3)(iii))

Potential Merger Partners (§358.4(b)(3)(v))

Transfers[1] (§358.4(c))

Information Disclosure[2] (§358.5(b) (3))

Voluntary Consent to Share Non-Affiliated Customer Information (§358.5(b)(4))

Discretionary Actions under Tariff [3] (§358.5(c)(4))

Discounts[4] (§358.5(d))

Chief Compliance Officer (§358.4(e)(6))

Written Procedures for Implementation (§358.4 (e)(3))

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to Section 3.1

[1] According to WEQ 002-4.3.10.4 a template is required for this item.
[2] According to WEQ 002-4.3.10.6 a template is required for this item.
[3] According to WEQ 002-4.3.10.5 a template is required for this item.
[4] According to WEQ 002-4.3.2.1 a template is required for this item.

Formal Comments of the Bonneville Power Administration (BPA) on WEQ-001
Due 3/21/08

1. Comment on 001-4.13 Table 4.2 Timing Requirements

Our comment relates specifically to Table 4-2 Request Timing Requirements.

We believe that NAESB should address a Market Interface issue as follows: Replace the term 'Day Ahead' with a specific timeframe measurement (eg. >1 hour and < 24 hours). At a minimum, 'Day Ahead' needs to be defined with clear timing parameters.

Explanation:
We recently encountered interpretation issues with the use of 'Day Ahead' as included in a TSP's 'Reservation Timing Requirements Table'. The interpretation error was with respect to how Day Ahead was interpreted in the 'Time Queued Prior to Start' column. We interpreted Day Ahead as the next day at 00:00. BPA had initially programmed functionality to define 'Day Ahead' as '>1 hour and <24 hours'. BPA has since changed their Timing Requirements Table by: 1) removing the term 'Day Ahead' and 2) updating the table to reflect the functionality on how the response window is calculated. Examples below:

Proposed NAESB Timing TABLE 4-2:

Class	Service Increment	Time Queued Prior to Start	Transmission Services Evaluation Time Limit	Customer Confirmation Time Limit after Accepted or Counteroffer
Non-Firm	Hourly	<1 hour	Best Effort	5 minutes
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes

Example of BPA's Timing Table:

Class	Service Increment	Time Queued Prior to Start	Transmission Services Evaluation Time Limit	Customer Confirmation Time Limit after Accepted or Counteroffer
Non-Firm	Hourly	<1 hour	Best Effort	5 minutes
Non-Firm	Hourly	>1 hour and < 24 Hours	30 minutes	5 minutes
Non-Firm	Hourly	> 24 Hours	30 minutes	30 minutes

2. Generation Imbalance

We believe the NAESB work plan for this business practice should include coordination with the NERC standard drafting team,

Explanation:
NAESB is using the FERC 890 Generation Imbalance definition located in FERC Order 890, Schedule 9 which is: "Generation Imbalance Service is provided when a difference occurs between the output of a generator located in the Transmission Provider's Control Area and a delivery

Formal Comments of the Bonneville Power Administration (BPA) on WEQ-001
Due 3/21/08

schedule from that generator to 1) another Control Area or 2) a load within the Transmision Provider's Control Area over a single hour."

The NAESB definition includes provisions for Generation Imbalance delivered at interchange points which will have linkages to the NERC Inadvertent Interchange (BAL-006) standard, NERC Project 2007-05, to ensure reliability requirements and market interface issues are coordinated in such a manner as to not impede market development of the Generation Imbalance product. Examples from the NERC SAR (Project 2007-05):

- Dispute Resolution: "Consider adding inadvertent interchange dispute resolution requirements or business practices, including adding requirements or business practices to provide data to identify and resolve disputes about interchange quantities"
- Clarification of measurement & timeframes: In BAL-006, R.2, it is not clear what hourly adjustments are, but it seems like a replacement for the end of the month meter correction presently performed when one reads the strikeout language.
- Ensure reliability standard requirements do not impede market development of the Generation Imbalance product. E.g., "...reliability is not compromised by inadvertent flows" and "Balancing Authorities do not excessively depend upon (others)"

The second part of the definition appears to be in conflict with the Energy Imbalance Service definition found in FERC Order 890, Schedule 4 which is as follows:
"Energy Imbalance Service is provided when a difference occurs between the scheduled and the actual delivery of energy to a load located within a Control Area over a single hour."

In the Energy Imbalance discussion, the measurement is simply for 'energy scheduled' vs. 'energy delivered' at a load's point-of-delivery. In the Generation Imbalance discussion, the measurement seems to require the ability to identify and measure which resource did or did not meet it's power obligation at a load's point-of-delivery. Is this the correct interpretation? If so, what existing reliability standards contain the requirements and measurements applicable to the BA or TSP necessary to make these measurements? If no such standards or requirements are in place, then NAESB needs to raise this with NERC.

Thank you for your consideration of these comments.

MidwestISO
Energizing the Heartland

FORMAL COMMENTS

Quadrant:	Wholesale Electric Quadrant
Recommendation:	**Number:** 2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3 **Title:** WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting
Submitted By:	Rob Lamoureux
Date:	March 21, 2008

The Midwest ISO is requesting the Wholesale Electric Quadrant Executive Committee consider the additional redline changes (listed below), prior to approving the "WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting" recommendation. The Midwest ISO believes the proposed changes will provide additional clarity to the business practices while not materially changing the intent of the recommendation.

001-4.6 A Transmission Provider/Seller shall respond to a Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-2 Reservation Timing Requirements.** The time limit is measured from the time the OASIS Transmission request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

001-4.7.1 If the Transmission Provider determines there is insufficient transfer capability available to grant the Transmission Customer's request and there is no obligation to provide Partial Service (or Partial Service is also not available in cases where the Transmission Provider is obligated to provide Partial Service). the Transmission Provider may respond by setting the request status to REFUSED.

001-4.9.3 In cases of inadvertent error, the Customer may in the very near term request that the Transmission Provider void (status of ANNULLED) a pre-confirmed request/reservation for short-term firm or non-firm point-to-point service. Honoring such a request is at the discretion of the Transmission Provider.

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001-4.10.2 The Transmission Customer may negotiate for a lower amount of transmission capacity by updating the capacity requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID. For example, the Customer may choose to coordinate the level of transmission service purchased across multiple Transmission Providers or other such purposes. Negotiation for a higher amount of transmission capacity shall not be allowed. A customer

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seeking additional capacity must submit a new request which will be assigned a new queue position.

Table 4-3
Priorities For Competing Reservations And Requests

ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
3c	Tier 2: Pending pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] but higher price	No
3h	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] but higher price.	Yes
7c	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration but higher price	No
7f	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration but higher price	No

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001-4.18 Given competing requests for a limited resource when a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from any pending (not confirmed) state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-3. These state changes require dynamic notification to the Customer if the Customer has requested dynamic notification on OASIS.

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001-13.1.3 PERFORMANCE METRICS LINK

The following types of information, as required by FERC Statutes and Regulations (18 CFR 37.6(h), 18CFR 37.6(i), and 18 CFR 37.6(j)(2)) shall be accessible from the ***"Performance Metrics"*** link.

a. The Transmission Provider shall establish a link entitled ***"Transmission Study Metrics"*** to view the information as required by 18 CFR 37.6(h). The information must be made available on a calendar quarterly basis and be posted within 15 days of the end of the quarter. The information must remain available on OASIS for three years after its posted date The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

b. The Transmission Provider shall establish a link entitled ***"Transmission Service Request Metrics"*** to view the information as required by 18 CFR 37.6(i). The information must be made available on a monthly basis and be posted by the 15th day of the subsequent month. The information must remain available for download on OASIS for three months after its posted date. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

c. The Transmission Provider shall establish a link entitled ***"Redispatch Cost"*** to view the information as required by 18 CFR 37.6(j)(2). The data must be made available on a monthly basis and be posted as soon as practical after the end of each month, but no later than when the invoice for redispatch-related services is sent to the Transmission Customer. The information must remain available for download on OASIS for three months after its posted date. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

955 Jefferson Ave.
Valley Forge Corporate Center
Norristown, PA 19403-2497

To: NAESB WEQ / WGQ Executive Committees

From: PJM Interconnection, LLC

Subject: Formal comments to 2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3

Date: March 21, 2008

PJM has reviewed the ESS/ITS Subcommittee recommendation to the NAESB Executive Committee with the subject request number. PJM's comments are extensive, and are most clearly transmitted via a redline version of the original request. Attached please find a redline version of that recommendation.

Your consideration of these comments on WEQ-001, changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting is most appreciated.

Respectfully Submitted:

Chris Advena, Manager, Tariff Integration
Patrick Brown, Manager, NERC & Regional Coordination
Kevin Gresh, Analyst, Tariff Integration

955 Jefferson Ave.
Valley Forge Corporate Center
Norristown, PA 19403-2497

1. RECOMMENDED ACTION:

___Accept as requested
XX Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

_XX_Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___Initiation
XX Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

Per Recommendation:

___Initiation
XX__Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

In the FERC Order 890 (paragraph 1378) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about re-bid of partial service. In FERC Order 890-A under docket Nos. RM-05-17 and RM05-25, the Commission declined to dictate beyond the principles outlined in Order 890 for rebid of partial service. (See paragraph 766).

In the FERC Orders 890 (paragraphs 1392 and 1401) and FERC Order 890-A (paragraphs 786-790) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about preconfirmation priority.

In the FERC Orders 890 (paragraph 413) and FERC Order 890-A (paragraph 142) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of transmission service metrics.

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In the FERC Orders 890 (paragraph 1318) and FERC Order 890-A (paragraphs 718, 720, 721, 722) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of planning study metrics.

In the FERC Order 890 (paragraph 1162) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about redispatch cost postings.

The ESS/ITS has reviewed Orders 890 and 890-A and is recommending adoption of the following standards. The Subcommittee believes this recommendation complies with the guidance provided by the Commission. The subcommittee is recommending moving some of the information link requirements from WEQ 002 to WEQ 001. Finally the Subcommittee is recommending recognition of a Generator Imbalance Ancillary Service.

RECOMMENDED STANDARDS:

The following proposed additions are to be included in the WEQ-001 Definition of Terms. The specific enumeration for each of these definitions will be established by NAESB Staff after ratification.

001-0.xx **Control Area** – As used in NAESB Standards, shall be synonomous with the NERC definition for the Balancing Authority Area.

001-0.yy **Partial Service** - transmission service offered or granted by a Transmission Provider that is for a shorter duration than requested (start-time through stop-time), less capacity than requested, or both.

The following are proposed redlined changes and additions to WEQ-001-2 Standard Terminology for Transmission and Ancillary Services

01-2.1.9 Sliding Yearly

The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year.

For example SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

01-2.1.13 Extended Yearly

The service starts at 00:00 of any date and stops at 00:00 more than one year later.

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The Transmission Provider may limit the service to be in increments of full years or full calendar months.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

Other Service Attribute Values

Seven ancillary services are pre-defined. Other services may be offered pursuant to filed tariffs.

001-2.5.4 Energy Imbalance Service (EI) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour and in accordance with Schedule 4 of the pro forma tariff.

…

001-2.5.7 Generator Imbalance Service (GI) - is provided when a difference occurs between the output of a generator located in the Transmission Provider's Control Area and a delivery schedule from that generator to (1) another Control Area or (2) a load within the Transmission Provider's Control Area over a single hour and in accordance with Schedule 9 of the pro forma tariff.

The following are proposed redlined changes and additions to WEQ-001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4.1 All reservations and price and/or capacity negotiations shall be conducted on OASIS.

Phase IA Negotiation Process State Transition Diagram

The NAESB OASIS Implementation Guide (WEQ-013) provides a process state diagram to define the Customer and Transmission Provider interactions for negotiating transmission service. This diagram defines the allowable steps in the reservation request, negotiation, approval, confirmation and post-confirmation processes.

001-4.4 RESERVED

001-4.5 RESERVED

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Negotiations Without Competing Bids

The following practices are defined in order to enhance consistency of the reservation process across OASIS nodes.

001-4.6 A Transmission Provider/Seller shall respond to a Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-2 Reservation Timing Requirements.** The time limit is measured from the time the request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

I. INVALID
II. DECLINED
III. REFUSED
IV. COUNTEROFFER
V. ACCEPTED
VI. RECEIVED or STUDY (leading to REFUSED, DECLINED, COUNTEROFFER, or ACCEPTED).

001-4.7 Prior to setting a request to ACCEPTED, COUNTEROFFER, or REFUSED a Transmission Provider shall evaluate the appropriate resources and ascertain that the requested transfer capability is (or is not) available.

001-4.7.1 If the Transmission Provider determines there is insufficient transfer capability available to grant the Transmission Customer's request and there is no obligation to provide Partial Service, the Transmission Provider may respond by setting the request status to REFUSED.

001-4.7.2 If the Transmission Provider determines there is sufficient transfer capability available to grant the Transmission Customer's request and the customer's bid price is at least equal to the provider's current posted offer price over time and all other Transmission Provider requirements have been met, the Transmission Provider shall respond by setting the request status to ACCEPTED.

001-4.7.2.1 If the Transmission Customer does not specify a bid price, the Transmission Provider shall consider the bid price to be equal to the current posted offer price when evaluating the request.

001-4.7.3 The Transmission Provider shall use the status of COUNTEROFFER to initiate the negotiation of requested capacity (Partial Service) and/or price.

001-4.7.3.1 The Transmission Provider is not required to provide short-term Partial Service in response to a Long-Term request.

001-4.7.3.2 If the available transfer capability can support only a portion of the total capacity requested by the Transmission Customer and the Transmission Provider is obligated or elects to offer what limited capability is available to the customer, the Transmission Provider shall notify the Transmission Customer on OASIS by

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setting the amount of capacity being offered over time in the transmission request and updating the request status to COUNTEROFFER.

001-4.7.3.3 If the Transmission Customer is attempting to negotiate price by submission of a bid price that is lower or higher than the current posted offer price, and the Transmission Provider elects to not negotiate price, the Transmission Provider shall notify the customer by setting the request status to DECLINED.

001-4.7.3.4 If the Transmission Provider elects to (continue to) negotiate price, the provider shall update the offer price over time in the transmission request, indicate whether the price being negotiated is higher or lower than the posted price, and set the request status to COUNTEROFFER.

001-4.7.3.5 If both capacity and price are being negotiated, that negotiation may be performed simultaneously.

001-4.8 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

001-4.9 The Customer may change a request from QUEUED, RECEIVED, STUDY, COUNTEROFFER, REBID, or ACCEPTED to WITHDRAWN at any time prior to CONFIRMED accept as follows.

001-4.9.1 Preconfirmed requests for short-term firm and non-firm point-to-point service shall not be allowed to be WITHDRAWN by the Customer unless counter offered by the Transmission Provider, after which the Customer shall be allowed to withdraw the request.

001-4.9.2 For a preconfirmed request for short-term firm point-to-point service, if the Transmission Provider has notified the Customer that a System Impact Study is needed, the Customer may, prior to execution of the System Impact Study Agreement, request that the Transmission Provider void (status of DECLINED) the request. The Transmission Provider must honor such request.

001-4.9.3 In the case of an inadvertent error, the Customer may in the very near term request that the Transmission Provider void (status of ANNULLED) a pre-confirmed request/reservation for short-term firm or non-firm point-to-point service. Honoring such a request is at the discretion of the Transmission Provider.

001-4.10 From ACCEPTED or COUNTEROFFER, a Customer may change the status to CONFIRMED, REBID or WITHDRAWN. The Customer has the amount of time designated as Customer Confirmation Time Limit in Table 4-2 Reservation Timing Requirements to change the state of the request to CONFIRMED. The Customer time limit is measured from the first time the request is moved to ACCEPTED or COUNTEROFFER, and is not reset with subsequent iterations of negotiation.

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001-4.10.1 The Transmission Customer shall use the request status of REBID to initiate or continue the negotiation of price and/or capacity.

001-4.10.2 The Transmission Customer may negotiate for a lower amount of transmission capacity by updating the capacity requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID. For example, the Customer may want to coordinate the level of transmission service purchased across multiple Transmission Providers or other such purposes. Negotiation for a higher amount of transmission capacity shall not be allowed. A customer seeking additional capacity must submit a new request which will be assigned a new queue position.

001-4.10.3 The Transmission Customer may negotiate for a higher or lower price by updating the bid price requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID.

001-4.10.4 The Transmission Customer shall positively acknowledge and agree to both the price and capacity over time by setting the bid price and requested capacity equal to the Transmission Provider's offer price and granted capacity prior to confirmation of the transmission service request.

001-4.12 Should the Customer elect to initiate or continue the negotiation of price and/or capacity by moving a transmission service request to REBID, the Transmission Provider shall respond by taking the request to a DECLINED, SUPERSEDED, ACCEPTED, or COUNTEROFFER state within the Provider Counter Time Limit, specified in **Table 4-2 Reservation Timing Requirements.** The Transmission Provider response time is measured from the most recent REBID time.

001-4.12.1 The Transmission Provider shall positively acknowledge and agree to both the price and capacity over time by setting the offer price and granted capacity equal to the Transmission Customer's bid price and requested capacity prior to acceptance of the transmission service request.

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001-4.13 The following timing requirements shall apply to all Point-to-Point transmission service requests unless stated otherwise in the Transmission Provider's Tariff:

[this should be made as a universal statement at the beginning of the standard, not in this specific requirement. Copy the universal out statement that already exists in WEQ-002 or WEQ-013 to this standard.]

Comment: These timing requirements differ from the PJM Open Access Transmission Tariff (Sections 17.8 and 18.3) which allow for proper scheduling between neighboring entities.

TABLE 4-2
Request Timing Requirements

Class	Service Increment	Time QUEUED Prior to Start	Provider Evaluation Time Limit[1]	Customer Confirmation Time Limit[2] after ACCEPTED or COUNTEROFFER[3]	Provider Counter Time Limit after REBID[4]
Non-Firm	Hourly	<1 hour	Best effort	5 minutes	5 minutes
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes	10 minutes
Non-Firm	Daily	N/A	30 minutes	2 hours	10 minutes
Non-Firm	Weekly	N/A	4 hours	24 hours	4 hours
Non-Firm	Monthly	N/A	2 days [5]	24 hours	4 hours
Firm	Daily	< 24 hours	Best effort	2 hours	30 minutes
Firm	Daily	N/A	30 days[6]	24 hours	4 hours
Firm	Weekly	N/A	30 days[6]	48 hours	4 hours
Firm	Monthly	N/A	30 days[6]	4 days	4 hours
Firm	Yearly	60 days [7]	30 days	15 days	4 hours

Notes for Table 4-2:

[1] Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.

[2] Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override pre-exemption deadlines.

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[3] Measurement starts at the time the request is first moved to either ACCEPTED or COUNTEROFFER. The time limit does not reset on subsequent changes of state.

[4] Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.

[5] Days are defined as calendar days.

[6] Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers shall make best efforts to respond within 72 hours, or prior to the scheduling deadline, whichever is earlier, to a request for Daily Firm Service received during period 2-30 days ahead of the service start time.

[7] Subject to Section 17.1 of the pro forma tariff, whenever feasible and on a nondiscriminatory basis, transmission providers should accommodate requests made with less than 60 days notice.

Negotiations with Competing Bids for Constrained Resources

001-4.14 The following are the relative queue priorities of Service Request Tiers[1]. The priorities refer only to negotiation of service and do not refer to curtailment priority.

001-4.15 Reservations and requests shall be handled in a first-come-first-served order based on QUEUE_TIME. Within a given Service Request Tier, with the exception of Service Request Tier 1, where there are competing requests for a constrained resource, the following request attributes shall be used to determine the relative priority for granting of service.

I.....Service Increment (Monthly, Weekly, Daily, Hourly)
II.....Duration (the amount of time between the Start Date and the Stop Date)
III.....Pre-confirmation Status
IV.....Price
V.....Queue Time

001-4.16 Table 4-3 describes the relative queue priorities of competing service requests with respect to the conditions whereby a subsequent request preempts a previously queued request, and the rules for offering right-of-first-refusal. If two competing requests do no meet the specific criteria listed in Table 4-3, the requests shall be evaluated and processed in a first-come-first-served order based on QUEUE_TIME. While the table indicates the relative priorities of two competing requests, it also is

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[1]Note: The term Tier is introduced to avoid confusion with existing terms such as TS_CLASS.

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intended to be applied in the more general case of more than two competing requests. – Take out “and reservations” because it seems to imply a confirmed reservation.

Comments:
FERC clarified in Paragraph 1401 that "the terms 'reservation' and 'request are not used interchangeably; 'reservation' is meant to be a confirmed request, while 'request' is a queued request that has not been confirmed." A *request* for service is not transmission service. It is just a request (for example, a request could be in 'STUDY," "ACCEPTED," or other non-confirmed status). A *reservation* is service in the "CONFIRMED" status.

“unconditional confirmed” and “conditional confirmed” are assumed as ‘CONFIRMED’ service that can be bumped, but once a request becomes confirmed service FERC language states that it can’t be pre-empted by any competing ‘request’, as requests can only pre-empt other requests. Where in the NAESB documentation is the definition for these types of reservations?

FERC Order 890 paragraph 1407 also references the NAESB WEQ standard:

> Moreover, this policy is consistent with NAESB business standard 001-4.25, which allows a pre-confirmed request for non-firm point-to-point transmission service to preempt a request of equal duration and lower price that has been accepted but not confirmed.**835**

NOTE:
PJM believes FERC made clear in Order 890 that a confirmed reservation for service can **not** be bumped by a competing request.

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Table 4-3
Priorities For Competing Reservations And Requests

ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
1	Tier 1: Long-term Firm, Native Load, and Network Firm	N/A - Not preempted by a subsequent request.	N/A
2	Tier 2: Pending (not confirmed) or confirmed but conditional Short-term Firm	Tier 1: Long-term Firm, Native Load, and Network Firm, Once Request 1 is unconditional, it may not be preempted.	No
3a	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment.	No
3b	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	No
3c	Tier 2: Pending pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] and higher price	No
3d	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	No
3e	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment and of equal or longer duration[1]	No
3f	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	Yes
3g	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	Yes
3h	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] and higher price.	Yes
4	Tier 3: Network Service From Non-Designated Resources	Tiers 1 and 2: All Firm (including Network).	No

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ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
5	Tier 4: All Non-Firm PTP	Tiers 1 and 2: All Firm (including Network).	No
6	Tier 4: All Non-Firm PTP	Tier 3: Network Service from Non-Designated Resources.	No
7	RESERVED		
7a	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment.	No
7b	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	No
7c	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration and higher price	No
7d	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment	No
7e	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment and of equal or longer duration[1]	No
7f	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration and higher price	No
7g	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm of higher service increment	Yes
7h	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	Yes
8	RESERVED		
9	Tier 5: Non-firm PTP Service over secondary receipt and delivery points.	Tiers 1 through 4	No
10	Tier 6: Non-firm Next Hour Market Service	Tiers 1 through 5	No

Notes for Table 4-3:

[1] Longer duration means more multiples of the same SERVICE_INCREMENT in a single request. Each such multiple must be at the same level of capacity. For example, a single request for three consecutive days shall be considered longer duration than a single request for two consecutive days. Also, multiple service requests or reservations may not be grouped for the purpose of determining duration. For example, three separate one-day requests for three consecutive days of service shall not be considered longer duration than a single request for two consecutive days.

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001-4.17 For a request or reservation that is Superseded or Displaced, respectively, the Transmission Provider must indicate the Assignment Reference Number of the competing request and the reason for denial of service in the SELLER_COMMENTS field.

001-4.18 Given competing requests for a limited resource and a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from any pending (not confirmed) state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-3. These state changes require dynamic notification to the Customer if the Customer has requested dynamic notification on OASIS.

001-4.26 RESERVED

001-4.27 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

The following are proposed additions to the WEQ-001 OASIS Standards

001-13 OASIS GENERAL POSTING STANDARDS

001-13.1 OASIS HOME PAGE

The Transmission Provider shall establish the following HTML hyperlinks to standardized information postings of a general (i.e., non-template) nature located on the Transmission Provider's OASIS Home Page at their registered OASIS URL address. These links must appear as named and in the following order:

NAESB Home Page

Standards of Conduct

In the case where a Transmission Provider has several Transmission Owners, the TO's are subject to the Standards of Conduct links and information. In that case, such as at PJM, the Transmission Provider will have links to the individual Transmission Owner's websites. The Transmission Owners websites will follow WEQ 001-13.1.2

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Performance Metrics

Business Practices, Waivers, and Exemptions

ATC Information

Nothing in this standard shall preclude the Transmission Provider from establishing additional hyperlinks or making additional content available on their OASIS Home Page.

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001-13.1.1 NAESB HOME PAGE LINK

The "***NAESB Home Page"*** hyperlink shall direct an OASIS user to the NAESB Home Page.

001-13.1.2 STANDARDS OF CONDUCT LINK

The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g,* Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g,* Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the "***Standards of Conduct***" link displayed on the Transmission Provider's OASIS Home Page.

Emergency Circumstances Deviations (§358.4(a) (2))

Marketing and Energy Affiliate List (§358.4(b) (1))

Shared Facilities (§358.4(b) (2))

Organizational Charts and Job Descriptions (§358.4(b) (3) (i))

Common Employees (§358.4(b) (3) (iii))

Potential Merger Partners (§358.4(b) (3) (v))

Transfers[2] (§358.4(c))

Information Disclosure[3] (§358.5(b) (3))

Voluntary Consent to Share Non-Affiliated Customer Information (§358.5(b) (4))

Discretionary Actions under Tariff [4] (§358.5(c) (4))

Discounts[5] (§358.5(d))

Chief Compliance Officer (§358.4(e) (6))

Written Procedures for Implementation (§358.4 (e) (3))

[2] According to WEQ 002-4.3.10.4 a template is required for this item.
[3] According to WEQ 002-4.3.10.6 a template is required for this item.
[4] According to WEQ 002-4.3.10.5 a template is required for this item.
[5] According to WEQ 002-4.3.2.1 a template is required for this item.

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These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to Standards of Conduct. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to WEQ 002-3.1

001-13.1.3 PERFORMANCE METRICS LINK

The following types of information, as required by FERC Statutes and Regulations (18 CFR 37.6(h), 18CFR 37.6(i), and 18 CFR 37.6(j) (2)) shall be accessible from the ***"Performance Metrics"*** link.

a. The Transmission Provider shall establish a link entitled ***"Transmission Study Metrics"*** to view the information as required by 18 CFR 37.6(h). The information must be made available on a calendar quarterly basis and be posted within 15 days of the end of the quarter. The information must remain available on OASIS for three years. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

b. The Transmission Provider shall establish a link entitled ***"Transmission Service Request Metrics"*** to view the information as required by 18 CFR 37.6(i). The information must be made available on a monthly basis and be posted by the 15th day of the subsequent month. The information must remain available for download on OASIS for three months. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

c. The Transmission Provider shall establish a link entitled ***"Redispatch Cost"*** to view the information as required by 18 CFR 37.6(j) (2). The data must be made available on a monthly basis and be posted as soon as practical after the end of each month, but no later than when the invoice for redispatch-related services is sent to the Transmission Customer. The information must remain available for download on OASIS for three months. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

"Redispatch Cost" doesn't apply to ISO/RTO's with markets from FERC Order 890. PJM uses the LMP market to determine dispatch. [need to add the paragraph reference from 890]

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001-13.1.4 BUSINESS PRACTICES, WAIVERS, AND EXEMPTIONS LINK

The Transmission Provider shall post information related to 1) any provider specific business practices, 2) any waivers or exemptions granted from any of the OASIS requirements or standards, and 3) any other pertinent information related to the conduct of business with the Transmission Provider.

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01-13.1.5 ATC INFORMATION LINK

Hold for future development by BPS/ESS/ITS to include NERC related documents and the required CBM/TRM statements. Prior version stated in WEQ 002-4.5.1:

Information related to the Transmission Provider's methodology for computing and application of Capacity Benefit Margin (CBM) and Transmission Reliability Margin (TRM). If the Transmission Provider does not use CBM or TRM in their assessment of Available Transmission Capability (ATC), that information shall also be in INFO.HTM.

…

The following are proposed redlined changes to WEQ-002-3.4 PROVIDER UPDATING REQUIREMENTS

002-3.4 PROVIDER UPDATING REQUIREMENTS

The following are the Provider update requirements:

a. **Provider Posting of TS Information**: Each Provider (including Secondary Providers and Value-Added Providers) shall be responsible for writing (posting) and updating TS Information on their OASIS Node. No User shall be permitted to modify a Provider's Information.

b. **General Postings**

(i) **INFO.HTM:** Each Provider shall provide general information on how to use their node and describe all special aspects, such as line losses, congestion charges and assistance. The address for the directory of this information shall be INFO.HTM (case sensitive), an HTML web page, linked to the Provider's registered URL address. See WEQ 002-4.5 for information required to be on the web page INFO.HTM.

(ii) **OASIS Home Page:** NAESB Standard WEQ-001-13 establishes specific HTML hyperlinks which must be made available on the Transmission Provider’s OASIS home page at their registered URL address.

…

The following are redlined changes to WEQ-002-4.5 GENERAL POSTINGS

002-4.5 GENERAL POSTINGS

002-4.5.1 INFO.HTM

When a regulatory order requires informational postings on OASIS and there is no OASIS S&CP template to support the postings or it is deemed inappropriate to use a template, or the location of the posting has not been specified in

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WEQ-001-13, there shall be a reference in INFO.HTM to the required information, including, but not limited to, references to the following:

- A common source of interconnection wide curtailment and interruption information, such as the NERC Transmission Loading Relief (TLR) web site.
- The location of the list of system studies conducted.
- Information on requesting the text file of the tariffs and service agreements.

For the purposes of this section, any link to required informational postings that can be accessed from INFO.HTM would be considered to have met the OASIS posting requirements, provided that the linked information meets all other OASIS accessibility requirements.

002-4.5.2 OASIS Home Page The NAESB WEQ-001-13 Standards establishes specific informational postings that must be accessible from the Transmission Provider's OASIS Home Page.

The following are proposed redlined changes to WEQ-013-2.2 Transaction Status to reflect the addition of WEQ-001- 4.9.3. Note: The definition of ANNULLED for the Data Dictionary Element Name Status will also be changed to reflect the addtion of WEQ-001-4.9.3.

013-2.2 Transaction Status

ANNULLED = assigned by the Seller when, by mutual agreement with the Customer, a reservation or pre-confirmed request is to be voided, or assigned unilaterally by the Primary Provider when a resale reservation is to be voided. (Final state).

4. SUPPORTING DOCUMENTATION

a. Description of Request:

In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions relevant to recommendation:

> *413 The Commission adopts the proposed requirement to post on OASIS metrics related to the provision of transmission service under the OATT. Specifically, transmission providers must post (1) the number of affiliate versus non-affiliate requests for transmission service that have been rejected and (2) the number of affiliate versus non-affiliate requests for transmission service that have been made. This posting must detail the length of service request (e.g., short-term or long-term) and the type of service requested (e.g., firm point-to-point, non-firm point-to-point or network service). The Commission also will require transmission providers to post their underlying load forecast assumptions for all ATC calculations and, to post on a daily basis, their actual daily peak load for the prior day. The Commission directs transmission providers to work through*

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NAESB to develop standards for consistent methods of posting the new requirements on OASIS.

1162 Accordingly, to provide greater availability of redispatch information, the Commission adopts certain additional posting requirements for transmission providers. Specifically, we direct each transmission provider to post on OASIS its monthly average cost of redispatch for each internal congested transmission facility or interface over which it provides redispatch service using planning redispatch or reliability redispatch under the pro forma OATT.[6] Additionally, to demonstrate the range of redispatch costs each month, the Commission directs transmission providers to post a high and low redispatch cost for the month for each of these same transmission constraints. The transmission provider shall calculate the monthly average cost in $/MWh for each congested transmission facility by dividing monthly total redispatch costs (at the facility) by the total MWhs that would otherwise be curtailed (at the facility) in the month absent the redispatch.[7] Transmission providers shall post internal constraint or interface data for the month if any planning redispatch or reliability redispatch is provided during the month, regardless of whether the transmission customer is required to reimburse the transmission provider for those exact costs. Thus, if the transmission customer pays for redispatch pursuant to a negotiated fixed rate, the transmission provider is required to post and calculate the monthly average redispatch costs and the high and low costs in the month even though the transmission provider will bill the customer the fixed rate. The same posting requirement applies if the customer is paying a monthly "higher of" rate.[8] The transmission provider shall post this data on OASIS as soon as practical after the end of each month, but no later than when it sends invoices to transmission customers for redispatch-related services. We direct transmission providers to work in conjunction with NAESB to develop this new OASIS functionality and any necessary business practice standards.

1318 We agree, however, with EEI's recommendation that the Commission delegate to NAESB the responsibility for developing the Standard and Communications Protocols, business practices and OASIS modifications that will be necessary to provide the performance metrics adopted above. NAESB is in the best position to develop the standards and the processes by which the performance metrics are posted.

1378 We interpret Exelon's request that we require all transmission providers to allow transmission customers to link consecutive requests for firm point-to-point transmission service and to evaluate such requests as a single request as asking us to (1) allow transmission customers to require the transmission provider to either grant service for the entire period, deny service for the entire period, or offer the same partial quantity for the

[6] The relevant reliability redispatch costs for posting purposes are those costs the transmission provider invoices network customers based on a load ratio share pursuant to section 33.3 of the pro forma OATT. The transmission provider need not perform new calculations of out-of-merit dispatch costs; rather the reliability redispatch invoices should form the basis of information from which the transmission provider determines monthly average reliability redispatch costs.

[7] For example, if reliability redispatch is used by the transmission provider to prevent curtailment of 10 MW of transmission provider or network customer load for 5 hours during the month across flowgate A, the transmission provider would use 50 MWh as the divisor to determine the monthly average cost of redispatch for flowgate A.

[8] This is not a new calculation for the transmission provider because the transmission provider must determine the redispatch costs to know whether to charge higher of the embedded rate or the redispatch costs.

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entire period and (2) require the transmission provider to consider the full duration of the linked requests when determining reservation priority pursuant to sections 13.2 of the pro forma OATT (short-term firm point-to-point transmission service). We require transmission providers working through NAESB to develop business practice standards to allow a transmission customer to rebid a counteroffer of partial service so the transmission customer is allowed to take the same quantity of service across all linked transmission service requests. Transmission providers need not implement these business practice standards until NAESB develops appropriate standards. We note that the transmission customer should not be required to take the same quantity of service across consecutive transmission service requests, it should simply have the option to do so. On the second issue, we reiterate that, according to existing NAESB business practice standard 001-4.16, the transmission provider is required to consider the full duration of the linked requests when determining reservation priority pursuant to section 13.2 of the pro forma OATT.

1392 Commenter also suggest changes to the OASIS protocols, including prohibiting transmission customers from changing a request into a pre-confirmed request and requiring OASIS platforms to be accessible on non-Windows/Explorer computers. We believe these issues are best addressed by NAESB.

1401 The Commission generally agrees with those commenters that argue that giving a priority to pre-confirmed requests can increase the efficient utilization of the system by giving priority to customers who are committed to purchase service over those who have not so committed, including customers that submit multiple requests without any intent to take service if each request is granted. However, we are mindful of concerns that doing so could undermine the Commission's desire to promote longer-term uses of the transmission system, disrupt the study process, or disadvantage transmission customers that are not in the position to pre-confirm their requests. As a result, we will modify the NOPR proposal and give priority only to pre-confirmed non-firm point-to-point transmission service requests and short-term firm point-to-point transmission service requests. In addition, longer duration requests for transmission service will continue to have priority over shorter duration requests for transmission service, with pre-confirmation serving as a tie-breaker for requests of equal duration. This policy will still give an advantage to pre-confirmed requests without imposing substantial implementation difficulties or undermining the Commission's goals to encourage longer-term uses of the transmission system. Our revised policy on priority for pre-confirmed requests thus addresses the comments that we should preserve the priority of longer duration requests for transmission service over shorter duration requests for transmission service. For instance, a pre-confirmed daily or hourly request will not preempt a weekly request that has not been pre-confirmed. Pre-confirmed short-term service requests therefore will not have a priority superior to that of long-term service requests that have not been pre-confirmed.

In the FERC Order 890-A under Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 dated December 28, 2007, the Commission made the following conclusions relevant to this recommendation:

142 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission

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service. While the affiliate posting requirements do not apply to RTOs and ISOs,[9] the requirement to post metrics regarding all transmission service requests remains.[10] We agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission service request metrics improves the transparency of transmission service request processing by those transmission providers.

718 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission service. While the affiliate posting requirements do not apply to RTOs and ISOs,[11] the requirement to post metrics regarding all transmission service requests remains.[12] We agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission service request metrics improves the transparency of transmission service request processing by those transmission providers.

720 We also affirm the decision to require any transmission provider that processes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines in the pro forma OATT for two consecutive quarters to submit a notification filing to the Commission and post additional performance metrics. We disagree with Washington IOUs that transmission providers should be required to post these metrics only after Commission action on a notification filing. Posting of these additional metrics is not required until two months after the notification filing, giving the Commission time to consider the extenuating circumstances that prevented the transmission provider from processing requested studies on a timely basis. If, upon review of such a filing, the Commission finds that delays were caused by extenuating circumstances, the Commission will not require the transmission provider to continue to post the additional performance metrics. As a result, we expect transmission providers with legitimate extenuating circumstances should not have to post any additional metrics.

721 Similarly, we decline to exempt, as a general matter, studies that are delayed by customer agreement or that are associated with resource planning. The transmission provider can explain the circumstances surrounding any particular delay in its notification filing, which the Commission will review on a case-by-case basis. The process adopted in Order No. 890 is sufficiently flexible to relieve any transmission provider who completes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines for two consecutive quarters from any additional posting requirements, or operational penalties, if the Commission finds the delays were due to extenuating circumstances.

722 The Commission grants rehearing to make several typographical revisions to our rules implementing these posting requirements. In Order No. 890, the Commission stated that short-term and long-term requests for point-to-point service must be aggregated for purposes of the posting requirement in order to ease the burden on transmission providers and in recognition that many customers requesting short-term point-to-point service are unwilling to pay for studies.[13] The accompanying regulations, however, stated that transmission providers must separately calculate and post metrics for long-term and short-

[9] See Order No. 890 at P 414.
[10] See 18 CFR 37.6(i) (1) and (2).
[11] See Order No. 890 at P 414.
[12] See 18 CFR 37.6(i) (1) and (2).
[13] See id. at P 1309.

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term requests.[14] Upon further consideration, we believe it appropriate to allow, but not require, transmission providers to aggregate requests for long-term and short-term point-to-point service for purposes of the posting requirements. We also clarify that the posting requirements apply to all requests for service, including requests for point-to-point service and requests to designate new network resources or loads. We have revised our regulations to make these requirements more clear.

766 The Commission affirms the decision in Order No. 890 to rely on the NAESB process to develop business practices to govern the processing of transmission requests across multiple transmission systems. We decline to dictate at this time, beyond those principles outlined in Order No. 890, the particular practices that must be implemented. It is more appropriate to allow transmission providers working through NAESB, in the first instance, to consider how best to ensure coordination across multiple systems. It is also appropriate to give NAESB an open timeframe to develop these standards since they must be broad enough to account for the complexities of coordinating multi-system transmission service requests.[15]

786 The Commission affirms the decision in Order No. 890 to give priority based on pre-confirmed status only to short-term firm and long-term non-firm requests for service. As the Commission explained in Order No. 890, the Commission was mindful that the pre-confirmation process could disrupt the transmission study process, undermine longer-term uses of the transmission system, or disadvantage transmission customers that are not in a position to pre-confirm their requests. Restricting the scope of transmission service requests receiving priority for pre-confirmation status to short-term firm and long-term non-firm service requests is necessary in order to minimize disruptions with existing study procedures and power procurement practices in place for long-term firm service requests. We believe this appropriately balances the need to promote long-term transmission rights against the need for increased certainty for customers seeking shorter-term firm and non-firm service.[16] Similarly, we decline to alter the Commission's long-standing policy of giving longer duration requests for service priority over shorter duration requests. To do so would undermine the Commission's goal of encouraging longer term uses of the transmission system.

787 We clarify in response to E.ON U.S. that, in the event an offer for service on a pre-confirmed request can only be accommodated by additions to the transmission provider's transmission system, the transmission customer may: (1) take a shorter term of service, if available; (2) agree to undertake any upgrades that may be necessary to accommodated the transmission requests; or (3) decline service. The Commission rejects Tenaska's proposal to adopt a deadline prior to which a transmission customer may withdraw a pre-confirmed transmission service request. Providing an opportunity to pre-confirm applications is intended to reduce overloading of transmission study queues and minimize the amount of transmission requests later withdrawn from the study queue,

[14] 18 CFR 37.6(h) (1).
[15] NAESB has indicated that business practices governing the coordination of service requests across multiple transmission systems are in development. The Commission requests NAESB to keep us informed regarding the status of developing these and other business practices.
[16] As we explain in section III.D.2.c, a customer exercising a rollover right is only required to match a bona fide competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract.

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increasing the efficiency of processing transmission service requests. Allowing transmission customers to withdraw pre-confirmed transmission service requests without reason or penalty as suggested by Tenaska would undermine the very reason pre-confirmation status has been given a priority.

788 We decline Southern's request to extend the effectiveness of the reforms regarding pre-confirmation priority pending development of related business practices by NAESB. We believe that Order No. 890 provides sufficient guidance for transmission providers to implement this priority in advance of any standardization efforts that may be undertaken through the NAESB process.

789 With respect to TranServ's question regarding application of the right of first refusal for eligible customers with requests for service over multiple days, the Commission clarifies that a competing request must exceed the total term of service in order to trigger the right of first refusal. Thus, in order for a competing request of equal price to preempt a reservation for three conservative days of daily service, that request must be for four consecutive days or longer and must be received at least one day before the first day of the original customer's three-day term of service.

790 Upon review of tariff provisions governing pre-confirmation of transmission service requests, the Commission has determined that the language adopted in Order No. 890 did not fully capture the Commission's intent of allowing all eligible customers the opportunity to pre-confirm short-term firm and non-firm reservations. As currently written, the language of sections 1.39, 17.2 and 18.2 of the pro forma OATT make pre-confirmation available only to those that are already transmission customers, rather than all eligible customers. The Commission has revised those sections of the pro forma OATT to more accurately reflect our intent that pre-confirmation service should be available to all eligible customers seeking short-term firm and non-firm transmission services.

WEQ 2008 Annual Plan Item 2.a.i.5

Re-Bid Of Partial Service Business Practice Standards on a Single Transmission Provider's System associated with S&CP Requirements

WEQ 2008 Annual Plan Items 2.a.i.6

Preconfirmation Priority Business Practice Standards associated with S&CP Requirements

WEQ 2008 Annual Plan Items 2.a.ii.1-3

Group 2: Metrics; Redispatch Cost Posting

1. *Metrics Related to Provision of Transmission Service (Paragraph 413 of Order 890)*
2. *Metrics Related to Performance of Transmission Studies (Paragraphs 1308 through 1317 of Order 890*
3. *Redispatch Cost Posting*
   - *Monthly average cost of redispatch*
   - *A high and low redispatch for the month*

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b. Description of Recommendation:

c. Business Purpose:

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Please review the following ESS/ITS Subcommittee meeting minutes:

November 8, 2007

November 20, 2007

December 6, 2007

December 18, 2007

January 15-16, 2008

January 31, 2008

February 11-12, 2008

Please review the Motions Document:
http://www.naesb.org/pdf3/weq_ess_its021108a2.doc

Rationale for not allowing increase capacity on re-bids in WEQ-001-4.10.2:

NAESB felt that allowing a customer to request additional capacity as part of the re-bid of partial service capability on OASIS represented a substantive change in the service requested that could require additional studies, etc and should be addressed through submission of an additional request for capacity and new queue position.

Table 4-3 and limitation on pre-emption to require competing requests to be preconfirmed:

NAESB has limited the competition between a confirmed reservation and a pending request of longer duration or equal duration and higher price (short-term firm only) to require that the pre-empting request must be pre-confirmed. We base this decision in part on the Commission's determination "…in section III.D.2.c, a customer exercising a rollover right is only required to match a *bona fide* competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract." We feel extending the same protection for existing confirmed short-term firm or non-firm reservations to only be at risk for preemption and the requirement to exercise ROFR where there is a "*bona fide* competing

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commitment", and that such commitment must be provided by the customer's submission of the competing request as pre-confirmed.

A minority opinion was expressed that the "*bona fide* competing commitment "could be met by having the TP and competing customer complete all negotiations and confirm the competing request contingent on all confirmed reservations that will be preempted opting to not match the duration of the competing request. At that point the TP extends the ROFR to the request(s) to be pre-empted. To the extent some existing customers may match and others may not, the competing request would be subject to full or partial displacements based on the amount of capacity that was retained through ROFR by the original customers. This process would NOT require submission of a longer duration request as preconfirmed to be considered a competing request with preemption of confirmed shorter duration reservations. This was found unpalatable by the majority because of the negative ATC during the pendency of the competing request(s) and queue management issues this would raise.

Removal of Standard WEQ-001-4.26:

Order 890 and 890-A have granted pre-confirmation status a higher priority than price. This coupled with revisions to Table 4.3 to require preempting requests to be pre-confirmed warranted removal of WEQ-001-4.26.

Page 10: [1] Deleted **Author**

The NAESB WEQ 001-4.25 reference:

> 001-4.25 Once an offer to provide non-firm PTP transmission service at a given price is
> extended to a Customer by the Transmission Provider, and while this first request is still unconfirmed but within the Customer Confirmation Time Limit, the Transmission Provider shall not preempt or otherwise alter the status of that first request on receipt of a subsequent request of the same Tier and equal duration at a higher price, unless the subsequent request is submitted as pre-confirmed.

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Even if NAESB defines the definitions for conditional and unconditional confirmed service,

Page 10: [3] Deleted **Author**

Our OATT Section 31.2 states the following: Firm Point-To-Point Transmission Service shall be available on a first-come, first-served basis, i.e., in the chronological sequence in which each Transmission Customer has requested service according to the provisions of Section 17. However, Pre-Confirmed Applications for Short-Term Point-to-Point Transmission Service will receive priority over earlier submitted requests that are not Pre-Confirmed and that have equal or shorter duration.

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SOUTHERN COMPANY COMMENTS

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant: **WEQ**

Requesters: **ESS/ITS Subcommittee**
Request No.: **2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title: **WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

1. RECOMMENDED ACTION:

___Accept as requested
XX Accept as modified below
___Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

XX Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___Initiation
XX Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

Per Recommendation:

___Initiation
XX Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

In the FERC Order 890 (paragraph 1378) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about re-bid of partial service. In FERC Order 890-A under docket Nos. RM-05-17 and RM05-25, the Commission declined to dictate beyond the principles outlined in Order 890 for rebid of partial service. (See paragraph 766).

In the FERC Orders 890 (paragraphs 1392 and 1401) and FERC Order 890-A (paragraphs 786-790) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about preconfirmation priority.

SOUTHERN COMPANY COMMENTS

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

In the FERC Orders 890 (paragraph 413) and FERC Order 890-A (paragraph 142) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of transmission service metrics.

In the FERC Orders 890 (paragraph 1318) and FERC Order 890-A (paragraphs 718, 720, 721, 722) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about posting of planning study metrics.

In the FERC Order 890 (paragraph 1162) under docket Nos. RM-05-17 and RM05-25, the commission made conclusions about redispatch cost postings.

The ESS/ITS has reviewed Orders 890 and 890-A and is recommending adoption of the following standards. The Subcommittee believes this recommendation complies with the guidance provided by the Commission. The subcommittee is recommending moving some of the information link requirements from WEQ 002 to WEQ 001. Finally the Subcommittee is recommending recognition of a Generator Imbalance Ancillary Service.

RECOMMENDED STANDARDS:

The following proposed additions are to be included in the WEQ-001 Definition of Terms. The specific enumeration for each of these definitions will be established by NAESB Staff after ratification.

001-0.xx **Control Area** – As used in NAESB Standards, shall be synonomous with the NERC definition for the Balancing Authority Area.

001-0.yy **Partial Service** - transmission service offered or granted by a Transmission Provider that is for a shorter duration than requested (start-time through stop-time), less capacity than requested, or both.

The following are proposed redlined changes and additions to WEQ-001-2 Standard Terminology for Transmission and Ancillary Services

SOUTHERN COMPANY COMMENTS
RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

01-2.1.9 Sliding Yearly

The service starts at 00:00 of any date and stops at 00:00 on the same date of the following year. If there is no corresponding date in the following year, the service stops at 24:00 on the last day of the same month in the following year.

For example SLIDING YEARLY service starting on February 29 would stop on February 28 of the following year.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

01-2.1.13 Extended Yearly

The service starts at 00:00 of any date and stops at 00:00 more than one year later.

The Transmission Provider may limit the service to be in increments of full years or full calendar months.

The Transmission Provider may limit the start of service to the beginning of a calendar month.

Other Service Attribute Values

Seven ancillary services are pre-defined. Other services may be offered pursuant to filed tariffs.

001-2.5.4 Energy Imbalance Service (EI) - is the service for transmission within and into the transmission provider's control area to serve load in the area. Energy imbalance represents the deviation between the scheduled and actual delivery of energy to a load in the local control area over a single hour and in accordance with Schedule 4 of the pro forma tariff.

…

001-2.5.7 Generator Imbalance Service (GI) - is provided when a difference occurs between the output of a generator located in the Transmission Provider’s Control Area and a delivery schedule from that generator to (1) another Control Area or (2) a load within the Transmission Provider’s Control Area over a single hour and in accordance with Schedule 9 of the pro forma tariff.

SOUTHERN COMPANY COMMENTS
RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

The following are proposed redlined changes and additions to WEQ-001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4 ON-LINE NEGOTIATION AND CONFIRMATION PROCESS

001-4.1 All reservations and price and/or capacity negotiations shall be conducted on OASIS.

Phase IA Negotiation Process State Transition Diagram

The NAESB OASIS Implementation Guide (WEQ-013) provides a process state diagram to define the Customer and Transmission Provider interactions for negotiating transmission service. This diagram defines the allowable steps in the reservation request, negotiation, approval, confirmation and post-confirmation processes.

001-4.4 RESERVED

001-4.5 RESERVED

Negotiations Without Competing Bids

The following practices are defined in order to enhance consistency of the reservation process across OASIS nodes.

001-4.6 A Transmission Provider/Seller shall respond to a Customer's service request, consistent with filed tariffs, within the Provider Response Time Limit defined in **Table 4-2 Reservation Timing Requirements.** The time limit is measured from the time the request is QUEUED. A Transmission Provider may respond by setting the state of the reservation request to one of the following:

I. INVALID
II. DECLINED
III. REFUSED
IV. COUNTEROFFER
V. ACCEPTED
VI. RECEIVED or STUDY (leading to REFUSED, DECLINED, COUNTEROFFER, or ACCEPTED).

SOUTHERN COMPANY COMMENTS
RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

001-4.7 Prior to setting a request to ACCEPTED, COUNTEROFFER, or REFUSED a Transmission Provider shall evaluate the appropriate resources and ascertain that the requested transfer capability is (or is not) available.

001-4.7.1 If the Transmission Provider determines there is insufficient transfer capability available to grant the Transmission Customer's request and there is no obligation to provide Partial Service, the Transmission Provider may respond by setting the request status to REFUSED.

001-4.7.2 If the Transmission Provider determines there is sufficient transfer capability available to grant the Transmission Customer's request and the customer's bid price is at least equal to the provider's current posted offer price over time and all other Transmission Provider requirements have been met, the Transmission Provider shall respond by setting the request status to ACCEPTED.

001-4.7.2.1 If the Transmission Customer does not specify a bid price, the Transmission Provider shall consider the bid price to be equal to the current posted offer price when evaluating the request.

001-4.7.3 The Transmission Provider shall use the status of COUNTEROFFER to initiate the negotiation of requested capacity (Partial Service) and/or price.

001-4.7.3.1 The Transmission Provider is not required to provide short-term Partial Service in response to a Long-Term request.

001-4.7.3.2 If the available transfer capability can support only a portion of the total capacity requested by the Transmission Customer and the Transmission Provider is obligated or elects to offer what limited capability is available to the customer, the Transmission Provider shall notify the Transmission Customer on OASIS by setting the amount of capacity being offered over time in the transmission request and updating the request status to COUNTEROFFER.

001-4.7.3.3 If the Transmission Customer is attempting to negotiate price by submission of a bid price that is lower or higher than the current posted offer price, and the Transmission Provider elects to not negotiate price, the Transmission Provider shall notify the customer by setting the request status to DECLINED.

001-4.7.3.4 If the Transmission Provider elects to (continue to) negotiate price, the provider shall update the offer price over time in the transmission request, indicate whether the price being negotiated is higher or lower than the posted price, and set the request status to COUNTEROFFER.

SOUTHERN COMPANY COMMENTS
RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

001-4.7.3.5 If both capacity and price are being negotiated, that negotiation may be performed simultaneously.

001-4.8 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

001-4.9 The Transmission Customer may change a request from QUEUED, RECEIVED, STUDY, COUNTEROFFER, REBID, or ACCEPTED to WITHDRAWN at any time prior to CONFIRMED except as follows.

001-4.9.1 Preconfirmed requests for short-term firm and non-firm point-to-point service shall not be allowed to be WITHDRAWN by the Customer unless counteroffered by the Transmission Provider, after which the Customer shall be allowed to withdraw the request.

001-4.9.2 For a preconfirmed request for short-term firm point-to-point service, if the Transmission Provider has notified the Customer that a System Impact Study is needed, the Customer may, prior to execution of the System Impact Study Agreement, request that the Transmission Provider void (status of DECLINED) the request. The Transmission Provider must honor such request.

001-4.9.3 In the case of an inadvertent error, the Customer may in the very near term request that the Transmission Provider void (status of ANNULLED) a pre-confirmed request/reservation for short-term firm or non-firm point-to-point service. Honoring such a request is at the discretion of the Transmission Provider.

001-4.10 From ACCEPTED or COUNTEROFFER, a Customer may change the status to CONFIRMED, REBID or WITHDRAWN. The Customer has the amount of time designated as Customer Confirmation Time Limit in Table 4-2 Reservation Timing Requirements to change the state of the request to CONFIRMED. The Customer time limit is measured from the first time the request is moved to ACCEPTED or COUNTEROFFER, and is not reset with subsequent iterations of negotiation.

001-4.10.1 The Transmission Customer shall use the request status of REBID to initiate or continue the negotiation of price and/or capacity.

001-4.10.2 The Transmission Customer may negotiate for a lower amount of transmission capacity by updating the capacity requested over time and changing the request

status from ACCEPTED or COUNTEROFFER to REBID. For example, the Customer may want to coordinate the level of transmission service purchased across multiple Transmission Providers or other such purposes. Negotiation for a higher amount of transmission capacity shall not be allowed. A customer seeking additional capacity must submit a new request which will be assigned a new queue position.

001-4.10.3 The Transmission Customer may negotiate for a higher or lower price by updating the bid price requested over time and changing the request status from ACCEPTED or COUNTEROFFER to REBID.

001-4.10.4 The Transmission Customer shall positively acknowledge and agree to both the price and capacity over time by setting the bid price and requested capacity equal to the Transmission Provider's offer price and granted capacity prior to confirmation of the transmission service request.

001-4.12 Should the Transmisson Customer elect to initiate or continue the negotiation of price and/or capacity by moving a transmission service request to REBID, the Transmission Provider shall respond by taking the request to a DECLINED, SUPERSEDED, ACCEPTED, or COUNTEROFFER state within the Provider Counter Time Limit, specified in **Table 4-2 Reservation Timing Requirements.** The Transmission Provider response time is measured from the most recent REBID time.

001-4.12.1 The Transmission Provider shall positively acknowledge and agree to both the price and capacity over time by setting the offer price and granted capacity equal to the Transmission Customer's bid price and requested capacity prior to acceptance of the transmission service request.

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For Quadrant: WEQ

Requesters: **ESS/ITS Subcommittee**
Request No.: **2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title: **WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

001-4.13 The following timing requirements shall apply to all Point-to-Point transmission service requests:

TABLE 4-2
Request Timing Requirements

Class	Service Increment	Time QUEUED Prior to Start	Provider Evaluation Time Limit[1]	Customer Confirmation Time Limit[2] after ACCEPTED or COUNTEROFFER[3]	Provider Counter Time Limit after REBID[4]
Non-Firm	Hourly	<1 hour	Best effort	5 minutes	5 minutes
Non-Firm	Hourly	>1 hour	30 minutes	5 minutes	5 minutes
Non-Firm	Hourly	Day ahead	30 minutes	30 minutes	10 minutes
Non-Firm	Daily	N/A	30 minutes	2 hours	10 minutes
Non-Firm	Weekly	N/A	4 hours	24 hours	4 hours
Non-Firm	Monthly	N/A	2 days [5]	24 hours	4 hours
Firm	Daily	< 24 hours	Best effort	2 hours	30 minutes
Firm	Daily	N/A	30 days[6]	24 hours	4 hours
Firm	Weekly	N/A	30 days[6]	48 hours	4 hours
Firm	Monthly	N/A	30 days[6]	4 days	4 hours
Firm	Yearly	60 days [7]	30 days	15 days	4 hours

Notes for Table 4-2:

[1] Consistent with regulations and filed tariffs, measurement starts at the time the request is QUEUED.
[2] Confirmation time limits are not to be interpreted to extend scheduling deadlines or to override pre-exemption deadlines.
[3] Measurement starts at the time the request is first moved to either ACCEPTED or COUNTEROFFER. The time limit does not reset on subsequent changes of state.
[4] Measurement starts at the time the Transmission Customer changes the state to REBID. The measurement resets each time the request is changed to REBID.
[5] Days are defined as calendar days.

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[6] Subject to expedited time requirements of Section 17.1 of the pro forma tariff. Transmission Providers shall make best efforts to respond within 72 hours, or prior to the scheduling deadline, whichever is earlier, to a request for Daily Firm Service received during period 2-30 days ahead of the service start time.

[7] Subject to Section 17.1 of the pro forma tariff, whenever feasible and on a nondiscriminatory basis, transmission providers should accommodate requests made with less than 60 days notice.

Negotiations with Competing Bids for Constrained Resources

001-4.14 The following are the relative queue priorities of Service Request Tiers[1]. The priorities refer only to negotiation of service and do not refer to curtailment priority.

001-4.15 Reservations and requests shall be handled in a first-come-first-served order based on QUEUE_TIME. Within a given Service Request Tier, with the exception of Service Request Tier 1, where there are competing requests for a constrained resource, the following request attributes shall be used to determine the relative priority for granting of service.

I. ..... Service Increment (Monthly, Weekly, Daily, Hourly)
II. ..... Duration (the amount of time between the Start Date and the Stop Date)
III ..... Pre-confirmation Status
IV……..Price
V……..Queue Time

001-4.16 Table 4-3 describes the relative queue priorities of competing service requests and reservations, with respect to the conditions whereby a subsequent request preempts a previously queued request or reservation, and the rules for offering right-of-first-refusal. If two competing requests do no meet the specific criteria listed in Table 4-3, the requests shall be evaluated and processed in a first-come-first-served order based on QUEUE_TIME. While the table indicates the

[1]Note: The term Tier is introduced to avoid confusion with existing terms such as TS_CLASS.

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relative priorities of two competing requests, it also is intended to be applied in the more general case of more than two competing requests.

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Table 4-3
Priorities For Competing Reservations And Requests

ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
1	Tier 1: Long-term Firm, Native Load, and Network Firm	N/A - Not preempted by a subsequent request.	N/A
2	Tier 2: Pending (not confirmed) or confirmed but conditional Short-term Firm	Tier 1: Long-term Firm, Native Load, and Network Firm, Once Request 1 is unconditional, it may not be preempted.	No
3a	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment.	No
3b	Tier 2: Pending, pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	No
3c	Tier 2: Pending pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] and higher price	No
3d	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	No
3e	Tier 2: Pending, not pre-confirmed Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment and of equal or longer duration[1]	No
3f	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm of higher service increment	Yes
3g	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment but of longer duration[1]	Yes
3h	Tier 2: Confirmed but conditional Short-term Firm	Tier 2: Pre-confirmed Short-term Firm for the same service increment, equal duration[1] and higher price.	Yes
4	Tier 3: Network Service From Non-Designated Resources	Tiers 1 and 2: All Firm (including Network).	No
5	Tier 4: All Non-Firm PTP	Tiers 1 and 2: All Firm (including Network).	No
6	Tier 4: All Non-Firm PTP	Tier 3: Network Service from Non-Designated Resources.	No
7	RESERVED		

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ROW	Request or Reservation 1	Is Preempted by Subsequent Request 2	Right of First Refusal?
7a	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment.	No
7b	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	No
7c	Tier 4: Pending, pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration and higher price	No
7d	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm of higher service increment	No
7e	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment and of equal or longer duration[1]	No
7f	Tier 4: Pending, not pre-confirmed Non-firm	Tier 4: Pre-confirmed Non-firm for the same service increment, equal duration and higher price	No
7g	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm of higher service increment	Yes
7h	Tier 4: Confirmed Non-firm more than one hour before start of service	Tier 4: Pre-confirmed Non-firm for the same service increment but of longer duration[1]	Yes
8	RESERVED		
9	Tier 5: Non-firm PTP Service over secondary receipt and delivery points.	Tiers 1 through 4	No
10	Tier 6: Non-firm Next Hour Market Service	Tiers 1 through 5	No

Notes for Table 4-3:

[1] Longer duration means more multiples of the same SERVICE_INCREMENT in a single request. Each such multiple must be at the same level of capacity. For example, a single request for three consecutive days shall be considered longer duration than a single request for two consecutive days. Also, multiple service requests or reservations may not be grouped for the purpose of determining duration. For example, three separate one-day requests for three consecutive days of service shall not be considered longer duration than a single request for two consecutive days.

001-4.17 For a request or reservation that is SUPERSEDED~~uperseded~~ or DISPLACED~~isplaced~~, respectively, the Transmission Provider must indicate the

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Assignment Reference Number of the competing request and the reason for denial of service in the SELLER_COMMENTS field.

001-4.18 Given competing requests for a constrained~~limited~~ resource and a right-of-first-refusal is not required to be offered, the Transmission Provider may immediately move requests in the CONFIRMED state to DISPLACED, or from any pending (not confirmed) state to SUPERSEDED, if the competing request is of higher priority, based on the rules represented in Table 4-3. These state changes require dynamic notification to the Customer if the Customer has requested dynamic notification on OASIS.

001-4.26 RESERVED

001-4.27 Consistent with the requirements in WEQ 013-2.3, Transmission Providers are required to post a reason for certain STATUS changes.

The following are proposed additions to the WEQ-001 OASIS Standards

001-13 OASIS GENERAL POSTING STANDARDS

001-13.1 OASIS HOME PAGE

The Transmission Provider shall establish the following HTML hyperlinks to standardized information postings of a general (i.e., non-template) nature located on the Transmission Provider's OASIS Home Page at their registered OASIS URL address. These links must appear as named and in the following order:

NAESB Home Page

Standards of Conduct

Performance Metrics

Business Practices, Waivers, and Exemptions

ATC Information

Nothing in this standard shall preclude the Transmission Provider from establishing additional hyperlinks or making additional content available on their OASIS Home Page.

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001-13.1.1 NAESB HOME PAGE LINK

The "***NAESB Home Page"*** hyperlink shall direct an OASIS user to the NAESB Home Page.

001-13.1.2 STANDARDS OF CONDUCT LINK

The following types of information, *as found in* Standards of Conduct for Transmission Providers, Order 2004, 105 FERC ¶61,248 (2003);*order on reh'g,* Order 2004-A, 107 FERC ¶61,032; *order on reh'g*, Order 2004-B, 108 FERC ¶61,118 (2004); *order on reh'g,* Order 2004-C, 109 FERC ¶61,325; *order on reh'g*, Order 2004-D, 110 FERC ¶61,320, and 18 CFR §358 should be accessible from the "***Standards of Conduct***" link displayed on the Transmission Provider's OASIS Home Page.

Emergency Circumstances Deviations (§358.4(a)(2))

Marketing and Energy Affiliate List (§358.4(b)(1))

Shared Facilities (§358.4(b)(2))

Organizational Charts and Job Descriptions (§358.4(b)(3)(i))

Common Employees (§358.4(b)(3)(iii))

Potential Merger Partners (§358.4(b)(3)(v))

Transfers[2] (§358.4(c))

Information Disclosure[3] (§358.5(b) (3))

Voluntary Consent to Share Non-Affiliated Customer Information (§358.5(b)(4))

Discretionary Actions under Tariff [4] (§358.5(c)(4))

Discounts[5] (§358.5(d))

[2] According to WEQ 002-4.3.10.4 a template is required for this item.
[3] According to WEQ 002-4.3.10.6 a template is required for this item.
[4] According to WEQ 002-4.3.10.5 a template is required for this item.

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Chief Compliance Officer (§358.4(e)(6))

Written Procedures for Implementation (§358.4 (e)(3))

These items shall appear in the order specified above and before any other items which may be required as per specific FERC direction or local business practice related to Standards of Conduct. Posting of the cites noted in the parentheses is optional. Access to some of the information found under the Standards of Conduct link above may require the user to register with the individual OASIS sites according to WEQ 002-3.1

001-13.1.3 PERFORMANCE METRICS LINK

The following types of information, as required by FERC Statutes and Regulations (18 CFR 37.6(h), 18CFR 37.6(i), and 18 CFR 37.6(j)(2)) shall be accessible from the ***"Performance Metrics"*** link.

a. The Transmission Provider shall establish a link entitled ***"Transmission Study Metrics"*** to view the information as required by 18 CFR 37.6(h). The information must be made available on a calendar quarterly basis and be posted within 15 days of the end of the quarter. The information must remain available on OASIS for three years. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

b. The Transmission Provider shall establish a link entitled ***"Transmission Service Request Metrics"*** to view the information as required by 18 CFR 37.6(i). The information must be made available on a monthly basis and be posted by the 15th day of the subsequent month. The information must remain available for download on OASIS for three months. The information is to be retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

c. The Transmission Provider shall establish a link entitled ***"Redispatch Cost"*** to view the information as required by 18 CFR 37.6(j)(2). The data must be made available on a monthly basis and be posted as soon as practical after the end of each month, but no later than when the invoice for redispatch-related services is sent to the Transmission Customer. The information must remain available for download on OASIS for three months. The information is to be

[5] According to WEQ 002-4.3.2.1 a template is required for this item.

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retained for five years from the date when it was first posted and made available upon request in the same electronic format as posted on OASIS.

001-13.1.4 BUSINESS PRACTICES, WAIVERS, AND EXEMPTIONS LINK

The Transmission Provider shall post information related to 1) any provider specific business practices, 2) any waivers or exemptions granted from any of the OASIS requirements or standards, and 3) any other pertinent information related to the conduct of business with the Transmission Provider.

01-13.1.5 ATC INFORMATION LINK

Hold for future development by BPS/ESS/ITS to include NERC related documents and the required CBM/TRM statements. Prior version stated in WEQ 002-4.5.1:

Information related to the Transmission Provider's methodology for computing and application of Capacity Benefit Margin (CBM) and Transmission Reliability Margin (TRM). If the Transmission Provider does not use CBM or TRM in their assessment of Available Transmission Capability (ATC), that information shall also be in INFO.HTM.

…

The following are proposed redlined changes to WEQ-002-3.4 PROVIDER UPDATING REQUIREMENTS

002-3.4 PROVIDER UPDATING REQUIREMENTS

The following are the Provider update requirements:

a. **Provider Posting of TS Information**: Each Provider (including Secondary Providers and Value-Added Providers) shall be responsible for writing (posting) and updating TS Information on their OASIS Node. No User shall be permitted to modify a Provider's Information.

b. **General Postings**

(i) **INFO.HTM:** Each Provider shall provide general information on how to use their node and describe all special aspects, such as line losses, congestion charges and assistance. The address for the directory of this information shall be INFO.HTM (case sensitive), an HTML web page, linked to the Provider's

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registered URL address. See WEQ 002-4.5 for information required to be on the web page INFO.HTM.

(ii) **OASIS Home Page:** NAESB Standard WEQ-001-13 establishes specific HTML hyperlinks which must be made available on the Transmission Provider's OASIS home page at their registered URL address.

…

The following are redlined changes to WEQ-002-4.5 GENERAL POSTINGS

002-4.5 GENERAL POSTINGS

002-4.5.1 INFO.HTM

When a regulatory order requires informational postings on OASIS and there is no OASIS S&CP template to support the postings or it is deemed inappropriate to use a template, or the location of the posting has not been specified in WEQ-001-13, there shall be a reference in INFO.HTM to the required information, including, but not limited to, references to the following:

- o A common source of interconnection wide curtailment and interruption information, such as the NERC Transmission Loading Relief (TLR) web site.
- o The location of the list of system studies conducted.
- o Information on requesting the text file of the tariffs and service agreements.

For the purposes of this section, any link to required informational postings that can be accessed from INFO.HTM would be considered to have met the OASIS posting requirements, provided that the linked information meets all other OASIS accessibility requirements.

002-4.5.2 OASIS Home Page The NAESB WEQ-001-13 Standards establishes specific informational postings that must be accessible from the Transmission Provider's OASIS Home Page.

The following are proposed redlined changes to WEQ-013-2.2 Transaction Status to reflect the addition of WEQ-001- 4.9.3. Note: The definition of ANNULLED for the Data

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Dictionary Element Name Status will also be changed to reflect the addtion of WEQ-001-4.9.3.

013-2.2 **Transaction Status**
ANNULLED = assigned by the Seller when, by mutual agreement with the Customer, a reservation or pre-confirmed request is to be voided, or assigned unilaterally by the Primary Provider when a resale reservation is to be voided. (Final state).

4. SUPPORTING DOCUMENTATION

a. Description of Request:
In the FERC Order 890 under Docket Nos. RM05-17-000 and RM05-25-000 dated February 16, 2007, the Commission made the following conclusions relevant to recommendation:

> *413 The Commission adopts the proposed requirement to post on OASIS metrics related to the provision of transmission service under the OATT. Specifically, transmission providers must post (1) the number of affiliate versus non-affiliate requests for transmission service that have been rejected and (2) the number of affiliate versus non-affiliate requests for transmission service that have been made. This posting must detail the length of service request (e.g., short-term or long-term) and the type of service requested (e.g., firm point-to-point, non-firm point-to-point or network service). The Commission also will require transmission providers to post their underlying load forecast assumptions for all ATC calculations and, to post on a daily basis, their actual daily peak load for the prior day. The Commission directs transmission providers to work through NAESB to develop standards for consistent methods of posting the new requirements on OASIS.*

> *1162 Accordingly, to provide greater availability of redispatch information, the Commission adopts certain additional posting requirements for transmission providers. Specifically, we direct each transmission provider to post on OASIS its monthly average cost of redispatch for each internal congested transmission facility or interface over which it provides redispatch service using planning redispatch or reliability redispatch under the pro forma OATT.[6] Additionally, to demonstrate the range of redispatch costs each*

[6] The relevant reliability redispatch costs for posting purposes are those costs the transmission provider invoices network customers based on a load ratio share pursuant to section 33.3 of the pro forma OATT. The transmission provider need not perform new calculations of out-of-merit dispatch costs; rather the reliability redispatch invoices should form the basis of information from which the transmission provider determines monthly average reliability redispatch costs.

month, the Commission directs transmission providers to post a high and low redispatch cost for the month for each of these same transmission constraints. The transmission provider shall calculate the monthly average cost in $/MWh for each congested transmission facility by dividing monthly total redispatch costs (at the facility) by the total MWhs that would otherwise be curtailed (at the facility) in the month absent the redispatch.[7] Transmission providers shall post internal constraint or interface data for the month if any planning redispatch or reliability redispatch is provided during the month, regardless of whether the transmission customer is required to reimburse the transmission provider for those exact costs. Thus, if the transmission customer pays for redispatch pursuant to a negotiated fixed rate, the transmission provider is required to post and calculate the monthly average redispatch costs and the high and low costs in the month even though the transmission provider will bill the customer the fixed rate. The same posting requirement applies if the customer is paying a monthly "higher of" rate.[8] The transmission provider shall post this data on OASIS as soon as practical after the end of each month, but no later than when it sends invoices to transmission customers for redispatch-related services. We direct transmission providers to work in conjunction with NAESB to develop this new OASIS functionality and any necessary business practice standards.

1318 We agree, however, with EEI's recommendation that the Commission delegate to NAESB the responsibility for developing the Standard and Communications Protocols, business practices and OASIS modifications that will be necessary to provide the performance metrics adopted above. NAESB is in the best position to develop the standards and the processes by which the performance metrics are posted.

1378 We interpret Exelon's request that we require all transmission providers to allow transmission customers to link consecutive requests for firm point-to-point transmission service and to evaluate such requests as a single request as asking us to (1) allow transmission customers to require the transmission provider to either grant service for the entire period, deny service for the entire period, or offer the same partial quantity for the entire period and (2) require the transmission provider to consider the full duration of the linked requests when determining reservation priority pursuant to sections 13.2 of the pro forma OATT (short-term firm point-to-point transmission service). We require transmission providers working through NAESB to develop business practice standards to allow a transmission customer to rebid a counteroffer of partial service so the transmission customer is allowed to take the same quantity of service across all linked transmission service requests. Transmission providers need not implement these business practice standards until NAESB develops appropriate standards. We note that

[7] For example, if reliability redispatch is used by the transmission provider to prevent curtailment of 10 MW of transmission provider or network customer load for 5 hours during the month across flowgate A, the transmission provider would use 50 MWh as the divisor to determine the monthly average cost of redispatch for flowgate A.

[8] This is not a new calculation for the transmission provider because the transmission provider must determine the redispatch costs to know whether to charge higher of the embedded rate or the redispatch costs.

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the transmission customer should not be required to take the same quantity of service across consecutive transmission service requests, it should simply have the option to do so. On the second issue, we reiterate that, according to existing NAESB business practice standard 001-4.16, the transmission provider is required to consider the full duration of the linked requests when determining reservation priority pursuant to section 13.2 of the pro forma OATT.

1392 Commenters also suggest changes to the OASIS protocols, including prohibiting transmission customers from changing a request into a pre-confirmed request and requiring OASIS platforms to be accessible on non-Windows/Explorer computers. We believe these issues are best addressed by NAESB.

1401 The Commission generally agrees with those commenters that argue that giving a priority to pre-confirmed requests can increase the efficient utilization of the system by giving priority to customers who are committed to purchase service over those who have not so committed, including customers that submit multiple requests without any intent to take service if each request is granted. However, we are mindful of concerns that doing so could undermine the Commission's desire to promote longer-term uses of the transmission system, disrupt the study process, or disadvantage transmission customers that are not in the position to pre-confirm their requests. As a result, we will modify the NOPR proposal and give priority only to pre-confirmed non-firm point-to-point transmission service requests and short-term firm point-to-point transmission service requests. In addition, longer duration requests for transmission service will continue to have priority over shorter duration requests for transmission service, with pre-confirmation serving as a tie-breaker for requests of equal duration. This policy will still give an advantage to pre-confirmed requests without imposing substantial implementation difficulties or undermining the Commission's goals to encourage longer-term uses of the transmission system. Our revised policy on priority for pre-confirmed requests thus addresses the comments that we should preserve the priority of longer duration requests for transmission service over shorter duration requests for transmission service. For instance, a pre-confirmed daily or hourly request will not preempt a weekly request that has not been pre-confirmed. Pre-confirmed short-term service requests therefore will not have a priority superior to that of long-term service requests that have not been pre-confirmed.

In the FERC Order 890-A under Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 dated December 28, 2007, the Commission made the following conclusions relevant to this recommendation:

142 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission

SOUTHERN COMPANY COMMENTS
RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

service. While the affiliate posting requirements do not apply to RTOs and ISOs,[9] the requirement to post metrics regarding all transmission service requests remains.[10] We agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission service request metrics improves the transparency of transmission service request processing by those transmission providers.

718 In response to TDU Systems, we clarify that Order No. 890 did not exempt RTOs and ISOs from the requirement to post metrics related to the provision of transmission service. While the affiliate posting requirements do not apply to RTOs and ISOs,[11] the requirement to post metrics regarding all transmission service requests remains.[12] We agree with TDU Systems that requiring RTOs and ISOs to post non-affiliate transmission service request metrics improves the transparency of transmission service request processing by those transmission providers.

720 We also affirm the decision to require any transmission provider that processes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines in the pro forma OATT for two consecutive quarters to submit a notification filing to the Commission and post additional performance metrics. We disagree with Washington IOUs that transmission providers should be required to post these metrics only after Commission action on a notification filing. Posting of these additional metrics is not required until two months after the notification filing, giving the Commission time to consider the extenuating circumstances that prevented the transmission provider from processing requested studies on a timely basis. If, upon review of such a filing, the Commission finds that delays were caused by extenuating circumstances, the Commission will not require the transmission provider to continue to post the additional performance metrics. As a result, we expect transmission providers with legitimate extenuating circumstances should not have to post any additional metrics.

721 Similarly, we decline to exempt, as a general matter, studies that are delayed by customer agreement or that are associated with resource planning. The transmission provider can explain the circumstances surrounding any particular delay in its notification filing, which the Commission will review on a case-by-case basis. The process adopted in Order No. 890 is sufficiently flexible to relieve any transmission provider who completes more than 20 percent of non-affiliates' studies outside of the 60-day due diligence deadlines for two consecutive quarters from any additional posting requirements, or operational penalties, if the Commission finds the delays were due to extenuating circumstances.

[9] See Order No. 890 at P 414.
[10] See 18 CFR 37.6(i)(1) and (2).
[11] See Order No. 890 at P 414.
[12] See 18 CFR 37.6(i)(1) and (2).

SOUTHERN COMPANY COMMENTS
RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

722 The Commission grants rehearing to make several typographical revisions to our rules implementing these posting requirements. In Order No. 890, the Commission stated that short-term and long-term requests for point-to-point service must be aggregated for purposes of the posting requirement in order to ease the burden on transmission providers and in recognition that many customers requesting short-term point-to-point service are unwilling to pay for studies.[13] The accompanying regulations, however, stated that transmission providers must separately calculate and post metrics for long-term and short-term requests.[14] Upon further consideration, we believe it appropriate to allow, but not require, transmission providers to aggregate requests for long-term and short-term point-to-point service for purposes of the posting requirements. We also clarify that the posting requirements apply to all requests for service, including requests for point-to-point service and requests to designate new network resources or loads. We have revised our regulations to make these requirements more clear.

766 The Commission affirms the decision in Order No. 890 to rely on the NAESB process to develop business practices to govern the processing of transmission requests across multiple transmission systems. We decline to dictate at this time, beyond those principles outlined in Order No. 890, the particular practices that must be implemented. It is more appropriate to allow transmission providers working through NAESB, in the first instance, to consider how best to ensure coordination across multiple systems. It is also appropriate to give NAESB an open timeframe to develop these standards since they must be broad enough to account for the complexities of coordinating multi-system transmission service requests.[15]

786 The Commission affirms the decision in Order No. 890 to give priority based on pre-confirmed status only to short-term firm and long-term non-firm requests for service. As the Commission explained in Order No. 890, the Commission was mindful that the pre-confirmation process could disrupt the transmission study process, undermine longer-term uses of the transmission system, or disadvantage transmission customers that are not in a position to pre-confirm their requests. Restricting the scope of transmission service requests receiving priority for pre-confirmation status to short-term firm and long-term non-firm service requests is necessary in order to minimize disruptions with existing study procedures and power procurement practices in place for long-term firm service requests. We believe this appropriately balances the need to promote long-term transmission rights against the need for increased certainty for

[13] See id. at P 1309.
[14] 18 CFR 37.6(h)(1).
[15] NAESB has indicated that business practices governing the coordination of service requests across multiple transmission systems are in development. The Commission requests NAESB to keep us informed regarding the status of developing these and other business practices.

customers seeking shorter-term firm and non-firm service.[16] *Similarly, we decline to alter the Commission's long-standing policy of giving longer duration requests for service priority over shorter duration requests. To do so would undermine the Commission's goal of encouraging longer term uses of the transmission system.*

787 We clarify in response to E.ON U.S. that, in the event an offer for service on a pre-confirmed request can only be accommodated by additions to the transmission provider's transmission system, the transmission customer may: (1) take a shorter term of service, if available; (2) agree to undertake any upgrades that may be necessary to accommodated the transmission requests; or (3) decline service. The Commission rejects Tenaska's proposal to adopt a deadline prior to which a transmission customer may withdraw a pre-confirmed transmission service request. Providing an opportunity to pre-confirm applications is intended to reduce overloading of transmission study queues and minimize the amount of transmission requests later withdrawn from the study queue, increasing the efficiency of processing transmission service requests. Allowing transmission customers to withdraw pre-confirmed transmission service requests without reason or penalty as suggested by Tenaska would undermine the very reason pre-confirmation status has been given a priority.

788 We decline Southern's request to extend the effectiveness of the reforms regarding pre-confirmation priority pending development of related business practices by NAESB. We believe that Order No. 890 provides sufficient guidance for transmission providers to implement this priority in advance of any standardization efforts that may be undertaken through the NAESB process.

789 With respect to TranServ's question regarding application of the right of first refusal for eligible customers with requests for service over multiple days, the Commission clarifies that a competing request must exceed the total term of service in order to trigger the right of first refusal. Thus, in order for a competing request of equal price to preempt a reservation for three conservative days of daily service, that request must be for four consecutive days or longer and must be received at least one day before the first day of the original customer's three-day term of service.

790 Upon review of tariff provisions governing pre-confirmation of transmission service requests, the Commission has determined that the language adopted in Order No. 890 did not fully capture the Commission's intent of allowing all eligible customers the opportunity to pre-confirm short-term firm and non-firm reservations. As currently written, the language of sections 1.39, 17.2 and 18.2 of the pro forma OATT make pre-

[16] As we explain in section III.D.2.c, a customer exercising a rollover right is only required to match a bona fide competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract.

SOUTHERN COMPANY COMMENTS
RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

confirmation available only to those that are already transmission customers, rather than all eligible customers. The Commission has revised those sections of the pro forma OATT to more accurately reflect our intent that pre-confirmation service should be available to all eligible customers seeking short-term firm and non-firm transmission services.

WEQ 2008 Annual Plan Item 2.a.i.5

Re-Bid Of Partial Service Business Practice Standards on a Single Transmission Provider's System associated with S&CP Requirements

WEQ 2008 Annual Plan Items 2.a.i.6

Preconfirmation Priority Business Practice Standards associated with S&CP Requirements

WEQ 2008 Annual Plan Items 2.a.ii.1-3

Group 2: Metrics; Redispatch Cost Posting

1. *Metrics Related to Provision of Transmission Service (Paragraph 413 of Order 890)*
2. *Metrics Related to Performance of Transmission Studies (Paragraphs 1308 through 1317 of Order 890*
3. *Redispatch Cost Posting*
   - *Monthly average cost of redispatch*
   - *A high and low redispatch for the month*

b. Description of Recommendation:

c. Business Purpose:

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Please review the following ESS/ITS Subcommittee meeting minutes:

November 8, 2007

November 20, 2007

December 6, 2007

December 18, 2007

January 15-16, 2008

SOUTHERN COMPANY COMMENTS

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**WEQ**
Requesters:	**ESS/ITS Subcommittee**
Request No.:	**2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3**
Request Title:	**WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting**

January 31, 2008

February 11-12, 2008

Please review the Motions Document: http://www.naesb.org/pdf3/weq_ess_its021108a2.doc

Rationale for not allowing increase capacity on re-bids in WEQ-001-4.10.2:

NAESB felt that allowing a customer to request additional capacity as part of the re-bid of partial service capability on OASIS represented a substantive change in the service requested that could require additional studies, etc and should be addressed through submission of an additional request for capacity and new queue position.

Table 4-3 and limitation on pre-emption to require competing requests to be preconfirmed:

NAESB has limited the competition between a confirmed reservation and a pending request of longer duration or equal duration and higher price (short-term firm only) to require that the pre-empting request must be pre-confirmed. We base this decision in part on the Commission's determination "…in section III.D.2.c, a customer exercising a rollover right is only required to match a *bona fide* competing commitment to take service, evidenced for example by a pre-confirmed transmission request or the execution of a contingent service contract." We feel extending the same protection for existing confirmed short-term firm or non-firm reservations to only be at risk for preemption and the requirement to exercise ROFR where there is a "*bona fide* competing commitment", and that such commitment must be provided by the customer's submission of the competing request as pre-confirmed.

A minority opinion was expressed that the "*bona fide* competing commitment "could be met by having the TP and competing customer complete all negotiations and confirm the competing request contingent on all confirmed reservations that will be preempted opting to not match the duration of the competing request. At that point the TP extends the ROFR to the request(s) to be pre-empted. To the extent some existing customers may match and others may not, the competing request would be subject to full or partial displacements based on the amount of capacity that was retained through ROFR by the original customers. This process would NOT require submission of a longer duration request as preconfirmed to be considered a competing request with preemption of confirmed shorter duration reservations.This was found unpalatable by the majority because of the negative ATC during the pendency of the competing request(s) and queue management issues this would raise.

Removal of Standard WEQ-001-4.26:

Order 890 and 890-A have granted pre-confirmation status a higher priority than price. This coupled with revisions to Table 4.3 to require preempting requests to be pre-confirmed warranted removal of WEQ-001-4.26.

FORMAL COMMENTS

Quadrant:	Wholesale Electric Quadrant
Recommendation:	2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3 – WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting
Submitted By:	Standards Review Subcommittee
Date:	March 21, 2008

Under the Standards Review Subcommittee Scope of Work, which was approved by the SRS on March 6, 2008, the SRS agreed to review recommendations and if subcommittee deemed appropriate, they would submit advisory comment to the Executive Committee for consideration. As stated in the Scope of Work these comments are "not intended to change the scope of the Business Practices or recommendation, but to provide consistency and uniformity across all WEQ Business Practices."

The SRS is requesting the Executive Committee consider the following advisory comments in their review of this recommendation:

- In the first sentence of the last paragraph of the Summary Section, the subcommittee suggests the following change.
  - Current language: The ESS/ITS has reviewed Orders 890 and 890-A and is recommending adoption of the following standards.
  - Proposed language: The ESS/ITS has reviewed Orders 890 and 890-A and is recommending adoption of the following revisions to existing standards WEQ-001, WEQ-002, and WEQ-013.
- The leading zero needs to be added to WEQ-001 references for the following sections:
  - 01-2.1.9 Sliding Yearly
  - 01-2.1.13 Extended Yearly
  - 01-13.1.5 ATC Information Link
- In the second sentence of Section 001-4.16 the phrase "do no meet" should be changed to "do not meet"
- 001-4.7.3.4 it is not clear what is intended with the parenthetical phrase "(to continue)". The SRS is unsure whether the parentheses are needed or if the parentheses are intended to indicate: If the Transmission Provider elects to negotiate price or elects to continue to negotiate price.

MEMORANDUM

To: WEQ Executive Committee (EC)

From: WEQ Joint Business Practice Subcommittee (BPS) and Electronic Scheduling Subcommittee/Information Technology Subcommittee (ESS/ITS)

Date: March 13, 2008

RE: Formal Comments on Recommendation Number 2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3

The ESS/ITS in its Recommendation Number 2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3 (WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting) proposed adding the following language to WEQ-001 under section WEQ-001-13.1.5 ATC Information Link:

> Hold for future development by BPS/ESS/ITS to include NERC related documents and the required CBM/TRM statements. Prior version stated in WEQ 002-4.5.1:
>
> Information related to the Transmission Provider's methodology for computing and application of Capacity Benefit Margin (CBM) and Transmission Reliability Margin (TRM). If the Transmission Provider does not use CBM or TRM in their assessment of Available Transmission Capability (ATC), that information shall also be in INFO.HTM.

The Joint BPS and ESS/ITS subcommittee was assigned WEQ 2008 Annual Plan Item 2.b.vii, which states:

> Business practice standards to set forth the procedure for input on TTC and ATC methodologies and values. (During the Order 890 NERC and NAESB joint standards development effort, it was determined that the standards contained in MOD003 should be business practice standards instead of reliability standards. NERC has requested that NAESB adopt the standards as business practices via correspondence to Ms. McQuade, NAESB President.)
>
> This item will require coordination with the NERC Order 890 reliability standards development because the language to address this item is contained within a draft standards that addresses items that are dependent on NERC deliverables, i.e., the requirements to create an “ATC Information Link” on OASIS. There is no Order 890 cite for this item.

During the analysis and recommendation development phases for this Annual Plan Item, the Joint BPS and ESS/ITS subcommittee has developed alternative language for the ATC Information Link section from what is contained in this proposed recommendation. Rather than having the Executive Committee approved the language contained in this recommendation for ATC Information Link and then approve revisions to the language provided by the BPS and ESS/ITS, we recommend that the Executive Committee delete the text under section WEQ -001-13.1.5 and keep the section header prior to approving

the recommendation. The subcommittee is making this recommendation to eliminate the possibility of having two recommendations being posted for membership ratification during the same time period, which have competing language in section WEQ-001-013.1.5

Thank you for your consideration of these minor corrections.

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: Charles Yeung
Request No.: 2008 AP items 1.c.i – ii, R03017
Request Title: Review the need to develop business practice standards to support Operate Within Limits (R03017)

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
_X_Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___Initiation
___Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

Per Recommendation:

___Initiation
___Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

R03017 was orginally submitted on September 10, 2003. The Description in the standard request stated the scope of the request was to:

> Provide complementary business practice standards to support the Operate Within Interconnection Reliability Operating Limits standard being developed by the North American Electric Reliability Council. Business practices, particularly practices for transaction curtailments, may be needed to support the reliability standards being developed to prevent instability, uncontrolled separation or cascading outages thatadversely impact the reliability of the bulk transmission system.

The SRS has reviewed the request and original scope document developed by the SRS on April12, 2004. In the scope document there are a number of references to managing

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: Charles Yeung
Request No.: 2008 AP items 1.c.i – ii, R03017
Request Title: Review the need to develop business practice standards to support Operate Within Limits (R03017)

transaction curtailments and developing a NAESB Business Practice for Congestion Management. Since this request was originally submitted a number of events have occurred including splitting the TLR process into the commercial and reliability aspects. In December NAESB Board approved the WEQ 2008 Annual Plan which included item, *1. d) "Prepare recommendations for future path for TLR in concert with NERC, which may include alternative congestion management procedures.*"

The SRS believes that any remaining work that was referenced in the originally scope document would logically fall under the WEQ 2008 Annual Plan item 1. d). Rather than having two separate items that are working on overlapping scope the SRS is recommending this request be declined and work begin on WEQ 2008 Annual Plan Item 1. d).

RECOMMENDED STANDARDS:

None

4. SUPPORTING DOCUMENTATION

a. Description of Request:

Provide complementary business practice standards to support the Operate Within Interconnection Reliability Operating Limits standard being developed by the North American Electric Reliability Council. Business practices, particularly practices for transaction curtailments, may be needed to support the reliability standards being developed to prevent instability, uncontrolled separation or cascading outages thatadversely impact the reliability of the bulk transmission system.

b. Description of Recommendation:

Decline request and begin work on WEQ 2008 Annual Plan Item 1. d).

c. Business Purpose:

Not applicable since no action is being taken.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

The following documentation was reviewed and assessed by a small group of SRS members. The assessment was presented to the SRS at their March 6, 2008.

- R03017 – http://www.naesb.org/pdf/r03017.pdf
- SRS Scope Document of R03017 dated April 12, 2004 – http://www.naesb.org/pdf3/weq_srs030608w2.pdf
- Drafts of IRO-007 through IRO-010 – ftp://www.nerc.com/pub/sys/all_updl/standards/sar/IRO-007-010-1_clean_30-day_comment_19Mar07.pdf

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: Charles Yeung
Request No.: 2008 AP items 1.c.i – ii, R03017
Request Title: Review the need to develop business practice standards to support Operate Within Limits (R03017)

The March 6, 2008 draft meeting minutes are posted at: tbd

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: Charles Yeung
Request No.: 2008 AP items 1.c.i – ii, R03017
Request Title: Review the need to develop business practice standards to support Operate Within Limits (R03017)

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
_X_Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___Initiation
___Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

Per Recommendation:

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___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

R03017 was orginally submitted on September 10, 2003. The Description in the standard request stated the scope of the request was to:

> Provide complementary business practice standards to support the Operate Within Interconnection Reliability Operating Limits standard being developed by the North American Electric Reliability Council. Business practices, particularly practices for transaction curtailments, may be needed to support the reliability standards being developed to prevent instability, uncontrolled separation or cascading outages thatadversely impact the reliability of the bulk transmission system.

The SRS has reviewed the request and original scope document developed by the SRS on April12, 2004. In the scope document there are a number of references to managing

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

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transaction curtailments and developing a NAESB Business Practice for Congestion Management. Since this request was originally submitted a number of events have occurred including splitting the TLR process into the commercial and reliability aspects. In December NAESB Board approved the WEQ 2008 Annual Plan which included item, *1. d) "Prepare recommendations for future path for TLR in concert with NERC, which may include alternative congestion management procedures.*"

The SRS believes that any remaining work that was referenced in the originally scope document would logically fall under the WEQ 2008 Annual Plan item 1. d). Rather than having two separate items that are working on overlapping scope the SRS is recommending this request be declined and work begin on WEQ 2008 Annual Plan Item 1. d).

RECOMMENDED STANDARDS:

None

4. SUPPORTING DOCUMENTATION

a. Description of Request:

Provide complementary business practice standards to support the Operate Within Interconnection Reliability Operating Limits standard being developed by the North American Electric Reliability Council. Business practices, particularly practices for transaction curtailments, may be needed to support the reliability standards being developed to prevent instability, uncontrolled separation or cascading outages thatadversely impact the reliability of the bulk transmission system.

b. Description of Recommendation:

Decline ~~recommendation~~ request and begin work on WEQ 2008 Annual Plan Item 1. d).

c. Business Purpose:

Not applicable since no action is being taken.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

The following documentation was reviewed and assessed by a small group of SRS members. The assessment was presented to the SRS at their March 6, 2008.

- R03017 – http://www.naesb.org/pdf/r03017.pdf
- SRS Scope Document of R03017 dated April 12, 2004 – http://www.naesb.org/pdf3/weq_srs030608w2.pdf

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: WEQ

Requesters: Charles Yeung
Request No.: 2008 AP items 1.c.i – ii, R03017
Request Title: Review the need to develop business practice standards to support Operate Within Limits (R03017)

- Drafts of IRO-007 through IRO-010 – ftp://www.nerc.com/pub/sys/all_updl/standards/sar/IRO-007-010-1_clean_30-day_comment_19Mar07.pdf

The March 6, 2008 draft meeting minutes are posted at: tbd

From: Kedrowski.Barbara
Sent: Tuesday, April 01, 2008 11:03 AM
To: Galik, Cory; naesb@naesb.org
Cc: Horn.Linda
Subject: Operate Within Limits (R03017)

We Energies supports dropping the development of the business practices to support the Operate within Limits standards.

Thanks!
Barb Kedrowski
Project Manager
Federal Regulatory & Policy
We Energies
414-221-3572
barbara.kedrowski@we-energies.com
This e-mail message and any attached files are confidential and are intended solely for the use of the addressee (s) named above. This communication may contain material protected by attorney-client, work product, or other privileges. If you are not the intended recipient or person responsible for delivering this confidential communication to the intended recipient, you have received this communication in error, and any review, use, dissemination, forwarding, printing, copying, or other distribution of this e-mail message and any attached file is strictly prohibited. If you have received this confidential communication in error, please notify the sender immediately at 1-800-558-3303 extension 3572 and permanently delete the original message.

—Original Message—
From: naesbmail@naesb.org [mailto:naesbmail@naesb.org]
Sent: Friday, March 07, 2008 4:00 PM
To: Kedrowski.Barbara
Subject: Request for Formal Comments for WEQ Recommendation WEQ 2008 AP Item 1.c.i-ii/R03017- Due 04/07/08

TO: NAESB WEQ Members and Interested Industry Participants

An industry formal comment period begins today, March 7, 2008 and ends on April 7, 2008 for one Wholesale Electric Quadrant recommendation:

WEQ 2008 Annual Plan Items 1.c.i-ii, R03017: Review the need to develop business practice standards to support Operate Within Limits (R03017)Clean Recommendation:

http://naesb.org/pdf3/r03017_2008_weq_api_1ci_ii_rec_clean.doc

This request was originally submitted on September 10, 2003 to provide complementary business practice standards to support the Operate Within Interconnection Reliability Operating standards being developed by the North American Electric Reliability Council. Since this request was originally submitted many of the activities listed are now being worked on in other standards. Any remaining work that was referenced in the original scope document would fall under WEQ 2008 Annual Plan item 1.d.

All interested parties, regardless of membership status within NAESB are eligible to submit comments for consideration. The Wholesale Electric Quadrant Executive Committee will review this

recommendation and consider it for vote during a future Executive Committee meeting. The Executive Committee will review all submitted comments.

All comments received by the NAESB office by end of business on April 7, 2008 will be posted on the Home Page (WEQ Request Page): http://www.naesb.org/weq_request.asp and forwarded to the WEQ Executive Committee members for their consideration. If you have difficulty downloading the recommendations, please call the NAESB office at (713) 356-0060.

NORTH AMERICAN ENERGY STANDARDS BOARD
1301 Fannin, Suite 2350 • Houston, Texas 77002 • **Phone:** (713) 356-0060 • **Fax:** (713) 356-0067
email: naesb@naesb.org • **Web Site Address:** www.naesb.org

Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 890, our subcommittees have accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one ballotting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

March 13, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Item 2.b.v.2**
Request Title:	**Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards**

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
_X_ Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___Initiation
___Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

Per Recommendation:

___Initiation
___Modification
___Interpretation
___Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The Joint ESS/ITS and BPS subcommittee reviewed the 2008 WEQ Annual Plan Item 2.b.v.2:

> Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards including any OASIS posting requirements to achieve the data exchange.

March 13, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Item 2.b.v.2**
Request Title:	**Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards**

The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

Upon review of this annual plan item and the requirements developed by NERC under MOD-001, MOD-004, MOD-008, MOD028, MOD-029, and MOD-030 the joint subcomittee is recommending no NAESB Business Practice Standards be developed for this annual plan item. The joint subcommittee has opted to take no action on this annual plan item, as the data exchange requirements have been addressed in the NERC standards. Members of the NERC ATC Drafting Team agreed with this action.

RECOMMENDED STANDARDS:

4. SUPPORTING DOCUMENTATION

a. Description of Request:

b. Description of Recommendation:

c. Business Purpose:

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Joint BPS & ESS/ITS Draft Meeting Minutes March 10-13, 2008

ATC-AFC Motions (from March 10-13, 2008 meeting):
http://naesb.org/pdf3/weq_atc_afc031008a8.doc

Comments Submitted by

Jack Cashin/Barry Green on behalf of EPSA

NAESB RECOMMENDATION

2008 WEQ Annual Plan Item 2.b.v.2

In the Annual Plan the joint BPS ESS/ITS subcommittee reviewing standards for incorporation of Order 890/890A has been assigned the following item:

"Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards including any OASIS posting requirements to achieve the data exchange."

EPSA sees that the joint subcommittee is recommending that no action be taken on this item as they believe the data exchange requirements have been addressed by NERC.

It is EPSA's opinion that this conclusion is premature.

We reach this conclusion in part because the NERC standards have not yet been approved by the NERC ballot body. Board and FERC approval will of course need to follow.

More fundamentally, however, the NERC MOD standards represent only one part of the requirements included under this Annual Plan item.

By definition, the NERC standards deal with the exchange of information only between entities involved in the *calculation* of ATC. NERC has made a deliberate decision to defer to NAESB on whether or not information will be made public to the entities affected by the calculation of ATC.

In this regard, NAESB drafted a list of ATC-related information, that is, information identified in the NERC MOD standards that will be developed as part of the ATC calculation process. The list was debated at length by the subcommittee and an initial draft of the list was compiled and presented to the Executive Committee at its November 2007 meeting. The list was later completed by the subcommittee, published for informal public comments on January 22, 2008 and shared with NERC. NERC and NAESB have agreed that they will each review the list and determine which if any items should be withheld from public view for reasons of reliability (to be determined by NERC), security (to be determined by NERC) or commercial sensitivity (to be determined by NAESB).

Until this determination is complete, EPSA submits that action on this Annual Plan item should remain pending.

NORTH AMERICAN ENERGY STANDARDS BOARD
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email: naesb@naesb.org • **Web Site Address:** www.naesb.org

Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 890, our subcommittees have accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one balloting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

April 4, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.iv.1-3**
Request Title:	**Transmission Reliability Margins Business Practices**

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
_X_Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
___Modification	___Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The Joint ESS/ITS and BPS subcommittee reviewed the 2008 WEQ Annual Plan Items 2.b.iv.1 through 3 which are specific to developing Transmission Reliability Margin Business Practices.

1. Transmission Reliability Margin (TRM): Business Practice Standards to complement the NERC reliability standards for TRM.

   The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

April 4, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.iv.1-3**
Request Title:	**Transmission Reliability Margins Business Practices**

2. The business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM.

   The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

3. The business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM.

   The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

The subcommittee reviewed a number of documents before making their decision to decline further action on these annual plan items including:

- the WEQ 2008 Annual Plan,
- the March 17, 2008, 890 Workplan,
- applicable references from FERC Order 890 and Order 890-A,
- the requirements developed by NERC under MOD-008,
- formal comments submitted under recommendation number WEQ 2007 Annual Plan Item 2(c) (Modifcations to WEQ-001 to comply with modifications to 18 C.F.R. 37.6 and 37.7 within Order 890),
- Final Action recommendation number 2007 WEQ Annual Plan Item 2(ii) (Group 1: Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority),
- Recommendation posted for formal comments, recommendation number 2008 AP Item 2.b.vii (WEQ-001 changes for “ATC Information Link” on OASIS and TTC and ATC methodologies and values),
- Various documents posted on the Joint WEQ BPS/ESS/ITS Meetings on ATC/AFC,

The Joint Subcommittee is recommending that no additional NAESB Business Practice Standards be developed in support of these annual plan items. The joint subcommittee has opted to take no action on these annual plan items, as the requirements have been addressed in actions taken by NAESB regarding the Order 890 NAESB efforts, namely the final action and recommendation referenced above.

RECOMMENDED STANDARDS:

No new standards are recommended.

April 4, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.iv.1-3**
Request Title:	**Transmission Reliability Margins Business Practices**

4. SUPPORTING DOCUMENTATION

a. Description of Request:

The Joint ESS/ITS and BPS subcommittee reviewed the 2008 WEQ Annual Plan Items 2.b.iv.1 through 3 which are specific to developing Transmission Reliability Margin Business Practices.

1. Transmission Reliability Margin (TRM): Business Practice Standards to complement the NERC reliability standards for TRM.

   The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

2. The business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM.

   The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

3. The business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM.

   The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development.

b. Description of Recommendation:

No additional NAESB Business Practices need to be developed to support the FERC 890 and FERC Order 890-A TRM requirements from what has already been submitted by the Joint ESS/ITS and BPS subcommittee and the ESS/ITS Subcommittee.

c. Business Purpose:

Meet NAESB TRM requirements documented in FERC Order 890 and Order 890-A.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

At the March 31, 2008, Joint BPS & ESS/ITS meeting the subcommittee reviewed the “TRM Background Documentation” document. Out of that document a number of items were identified as requiring further discussion. Each of these items were discussed in detail and documented in the “BPS/ESS/ITS Concepts/Discussion Items TRM Recommendation” document. Upon completion of this review the joint subcommittee determined no additional standards were needed to meet the NAESB

April 4, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.iv.1-3**
Request Title:	**Transmission Reliability Margins Business Practices**

TRM requirements under FERC Order 890 and Order 890-A. This decision is captured in the "BPS/ESS/ITS Motions TRM Recommendation" document.

Supporting documentation

- Draft Meeting Minutes March 31, 2008
- TRM Background Documentation
- BPS/ESS/ITS Motions TRM Recommendation
- BPS/ESS/ITS Concepts/Discussion Items TRM Recommendation

EPSA COMMENTS IN RESPONSE TO

RECOMMENDATION ON WEQ ANNUAL PLAN ITEM 2.b.iv.1-3

EPSA submits the following comments with respect to the Recommendation on WEQ Annual Plan Item 2.b.iv.1-3 that no further action be taken with respect to TRM. These comments are being offered in the context of the current version of NERC standard MOD-008-1 on TRM (posted for comment on April 16th) and similar comments will also be filed with NERC. Our comments are based also on Order 890 Paragraph 207 which states in part:

The purpose of **increasing the consistency and transparency** (emphasis added) of ATC calculations is to reduce the potential for undue discrimination in the provision of transmission service, specifically by reducing the opportunity for transmission providers to exercise excessive discretion. We find that the amount of discretion in the existing ATC calculation methodologies gives transmission providers the ability and opportunity to unduly discriminate against third parties. In order to minimize this discretion, the Final Rule requires that all ATC components (i.e., TTC, ETC, CBM, and TRM) and certain data inputs, data exchange, and assumptions be consistent and that the number of industry-wide ATC calculation formulas be few in number, transparent and produce equivalent results.

Assuming that the current draft of NERC MOD-008-1 is ultimately approved by the NERC Board and that this recommendation from the NAESB subcommittee is adopted, the industry would have completed its work on TRM. EPSA cannot agree that the mandate given by FERC to NERC and to NAESB has been carried out with respect to TRM.

This conclusion does not arise solely from NAESB's actions. However, part of the work in implementing the relevant sections of Order 890/890A involves coordination between NAESB and NERC. Therefore if the standards as a whole fall short of expectations, it is incumbent on both parties to take appropriate actions.

Specifically, with regard to TRM, EPSA accepts that in calculating ATC, Transmission operators need a margin, which is deducted from TTC, ATC or AFC as appropriate, to allow for uncertainties in forecast conditions and thus to insure that Transmission Service is not oversold. As it represents an allowance for uncertainties, it is recognized that TRM is based on assumptions about future conditions and is in general, determined probabilistically.

However, based on the proposed actions of the two standards development organizations, in order to meet FERC's Order to "increas[e] the consistency and transparency of ATC calculations" and to "reduc[e] the opportunity for transmission providers to exercise excessive discretion" the industry has provided standards that:

- Require Transmission Operators to only **identify** various elements if they are used in **establishing** (as opposed to calculating which was in an earlier draft of the NERC standard) TRM. (NERC MOD-001-1 Requirement 1.1).
    - At no point in the standard however, is any direction provided on how the Transmission Operators determine whether or not to use the various components or, if used, how values are to be established.
- Make no provision for monitoring or reporting on utilization of TRM
- Make no provision for benchmarking from season to season or year to year whether the values utilized in establishing TRM were or remain appropriate.

These standards therefore impose only a minimal requirement for transparency and no requirement for consistency in establishing TRM and no requirement to monitor its usage to verify that assumed values are appropriate.

The current NERC and NAESB standards on TRM are reminiscent of the previous NERC standard on ATC which was developed in response to Order 888. It required only that Transmission Operators document their methodology for calculating ATC, much like other fill-in-the-blank standards. Clearly in approving Order 890 and more particularly in Order 693 where they declined to approve other industry fill-in-the-blank standards, FERC has determined that such a standard is insufficient. Yet, with respect to TRM, the industry, through NERC and NAESB, seems prepared to submit standards to FERC that demonstrate that very little progress has been made.

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

TAB 4

Recommendations and Drafts for Discussion Only

- The recommendations currently out for comment are presented here for review. The materials are provided for discussion purposes and no action is required of the WEQ EC members.
  - 2008 WEQ Annual Plan Item 2.b.v.1: Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards, comments due May 23, 2008
  - 2008 WEQ Annual Plan Item 2.b.vi: Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13, comments due June 4, 2008
- The materials in Tab 4 correspond to agenda item 4.

NORTH AMERICAN ENERGY STANDARDS BOARD
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email: naesb@naesb.org • **Web Site Address:** www.naesb.org

Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 890, our subcommittees have accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one ballotting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

April 22, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 AP Item 2.b.v.1**
Request Title:	**Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards**

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
_XX_Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

____Change to Existing Practice
_XX_Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:

___Initiation
___ Modification
___Interpretation
_XX_Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

Per Recommendation:

___Initiation
___ Modification
___Interpretation
_XX_Withdrawal

___Principle
___Definition
___Business Practice Standard
___Document
___Data Element
___Code Value
___X12 Implementation Guide
___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

After a thorough review of the Summary of ATC Directives in FERC Orders 890 and 890-A, on March 28, 2008 and April 7, 2008 the Joint WEQ ESS/ITS and WEQ BPS developed the BPS/ESS/ITS Concepts AFC-ATC Recommendation document to verify if all issues concepts has been captured in other recommendations or would be captured in future recommendations. After reviewing each item the subcommittee determined no additional standards needed to be developed under this recommendation.

RECOMMENDED STANDARDS:

April 22, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 AP Item 2.b.v.1**
Request Title:	**Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards**

No additional standards are required from what is already documented in the ATC Information Link (2008 Annual Plan 2.b.vii) and what is required for ATC postings under the previously ratified recommendation Modifcations to WEQ-001 to comply with modifications to 18 C.F.R. 37.6 and 37.7 within Order 890 with Minor Corrections applied on February 27, 2008.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

WEQ 2008 Annual Plan Item

2.b.v. Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)):

(1) Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards.

FERC Order 890 References

301 Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)):

- Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards (Paragraph 301 will require coordination with the NERC Order 890 reliability standards development).

FERC Order 890-A References:

53. We clarify in response to NorthWestern that TRM may be used to accommodate the procurement of ancillary services used to provide service under the pro forma OATT. We deny as premature EPSA's and Williams' requests for clarification

regarding the realtime determination and posting of ATC and AFC values, as well as posting of utilization of transmission provider's own system ETC. In Order No. 890, the Commission required an exchange of the data both for short and long-term ATC/AFC calculation that will increase the accuracy of ATC calculations.[33] The Commission also required that ATC be recalculated by all transmission providers on a consistent time interval, and in a manner that closely reflects the actual topology of the system, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data, and that NERC/NAESB revise the related reliability standard and business practices accordingly.[34] EPSA and William should address their concerns through the NERC and NAESB processes implementing these requirements.

60.Order No. 890 requires NERC and NAESB to develop a single set of ATC-related standards that will apply to all transmission providers, including RTOs and ISOs. We understand that the NERC ATC standard drafting team includes representatives from various industry sectors, including RTOs/ISOs, and we encourage NYISO to participate in the standard development process to provide NERC an opportunity to address its concerns. To the extent NYISO feels its concerns are not address in this process, it should bring the issue to the Commission's attention on review of the resulting reliability standards.

101.The Commission directed public utilities, working through NERC and NAESB, to revise reliability standard MOD-001 to require ATC to be recalculated by all transmission providers on a consistent time interval and in a manner that closely reflects the actual topology of the system, e.g., generation and transmission outages, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data. The Commission stated that this process must also consider whether ATC should be calculated more frequently for constrained facilities.

104.The Commission agrees with Powerex that the standards adopted through the NERC and NAESB processes should serve as minimum or "no less frequent than" requirements to recalculate ATC. Transmission providers also must update their ATC calculation when they receive substantial and material changes in data, such as updated load forecasts, changes in topology and dispatch patterns, which may be more frequent than the NERC and NAESB standards would otherwise require. In the absence of substantial and material changes in data, transmission providers are not required to update ATC on a more frequent basis than the minimum frequency that the NERC and NAESB standards require, once implemented. The Commission will consider the adequacy of the time frame for ATC updates on review of these standards.

148. In Order No. 890, the Commission required transmission providers to make available, upon request, all data used to calculate ATC, TTC, CBM and TRM for any constrained posted path. We believe that this adequately addresses Constellation's

request for access to modeling data used by the transmission provider. Specifically, we expect transmission providers to make available, upon request and subject to appropriate confidentiality protections and CEII requirements, the following modeling data: (1) load flow base cases and generation dispatch methodology; (2) contingency, subsystem, monitoring, change files and accompanying auxiliary files; (3) transient and dynamic stability simulation data and reports on flowgates which are not thermally limited; (4) list of transactions used to update the base case for transmission service request study; (5) special protection systems and operating guides, and specific description as to how they are modeled; (6) model configuration settings; (7) dates and capacities of new and retiring generation; (8) new and retired generation included in the model for future years; (9) production cost models (including assumptions, settings, study results, input data, etc.), subject to reasonable and applicable generator confidentiality limitations; (10) searchable transmission maps, including PowerWorld or PSSE diagrams; (11) OASIS names to Common Names table and PTI bus numbers; and, (12) flowgate and interface limits including limit category (thermal, steady state or transient, voltage or angular). We decline, however, to require the transmission provider to post this information on OASIS, as Constellation suggests. We conclude that making this information available on request provides sufficient transparency for customers without unduly burdening the transmission provider.

149.With regard to the modeling support information sought by Constellation, we believe much of this information should already be stated in each transmission provider's Attachment C. In Order No. 890, the Commission required each transmission provider to set forth in the Attachment C to its OATT the ATC calculation methodology used by the transmission provider. To the extent necessary, we clarify that the step-by-step modeling study methodology and criteria for adding or eliminating flowgates (permanent and temporary) is part of the ATC methodology that must be stated in the transmission provider's Attachment C. We direct any transmission provider that has failed to include this information in its Attachment C to include that information as part of the compliance filing directed in section II.C. If the transmission provider has already satisfied this obligation in a previous compliance filing, it should refer to that filing instead.

150.We deny as premature Constellation's request to require OASIS postings of additional model benchmarking and forecasting data/TSR study audit data. Such information would be utilized in the process of updating and benchmarking models to actual events, which is the subject of ongoing efforts to modify relevant reliability standards from the MOD and facilities design, connections and maintenance (FAC) groups.

April 22, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 AP Item 2.b.v.1**
Request Title:	**Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC Reliability Standards**

152. We deny TDU Systems' request to require transmission providers to grant customers access to proprietary modeling software used to calculate ATC values. The Commission believes at this time that the requirements of Order No. 890 are sufficient to achieve the Commission's transparency goals without further requiring the disclosure of proprietary software.

b. Description of Recommendation:

No additional changes are required.

c. Business Purpose:

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

Please review the following Joint BPS and ESS/ITS ATC/AFC Subcommittee meeting minutes:

March 28, 2008

April 7, 2008

April 16, 2008

Please review the Motions Document:
http://www.naesb.org/pdf3/weq_atc_afc041608a1.doc

Please review the Concepts Document:
http://www.naesb.org/pdf3/weq_atc_afc041608a2.doc

NORTH AMERICAN ENERGY STANDARDS BOARD
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Dear Wholesale Electric Quadrant Members and Interested Industry Participants –

For the attached recommendation for standards that are linked to NERC standards development for FERC Order No. 890, our subcommittees have accepted these proposed standards and are asking you to comment on them in a formal comment period. They are also asking the WEQ Executive Committee to consider this recommendation and comments that are submitted during the formal comment period, and vote on this recommendation.

The subcommittees understand that the proposed standards include references to NERC reliability standards that have not yet been approved through the NERC process, but are based on their current work products. The proposed standards include placeholders for the NERC references, which will be added once they are approved by NERC. The subcommittees do not expect that this recommendation will require significant rework by the subcommittees once NERC adopts its related reliability standards. The subcommittees' chairs will review the final NERC standards once adopted and will identify if any changes are needed to recommendations that have already been processed through commenting and EC consideration. If changes are needed, a determination will be made whether the changes can be processed as minor actions, or for more substantive changes, the standards modification process will be used.

We are taking these steps and offering this recommendation for your comment and for EC consideration for vote rather than waiting until NERC completes its full process because:

(1) NERC has developed draft standards for the referenced items which have been processed through at least one balloting period.
(2) The NAESB subcommittees do not expect the changes to be made by NERC in its current efforts to yield substantive changes to the NAESB related standards.
(3) The progress being made by the subcommittees now on Order 890 towards meeting the August deadline will be adversely affected if the all NAESB Order No. 890 recommendations with NERC references are held in abeyance until NERC has concluded its efforts.
(4) The interested industry participants and the WEQ EC will have the opportunity to review the NAESB Order No. 890 recommendations with NERC references for formal comment and consideration as NAESB completes its efforts on each recommendation. In this manner, the industry and the EC are asked to consider proposed standards within a reasonable workflow. The alternative is to hold all NAESB Order No. 890 recommendations with NERC references and then submit them all for industry comment and EC consideration which would provide a significant amout of documents for review, comment and consideration.
(5) Last, but certainly not least, submitting the recommendations now to the industry and to the WEQ EC will provide the necessary signals from the industry through formal comments and through EC actions. If corrective action is needed, NAESB would have the opportunity to meet or come closer to the deadlines set by the FERC.

Please note that the subcommittees have worked diligiently on this recommendation along with the work products available from NERC and that all steps outlined conform with NAESB operating procedures. We appreciate your consideration and your comments.

With Best Regards,

Marcie Otondo, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
Ed Skiba, Co-Chair, NAESB Business Practices Subcommittee
Paul Sorenson, Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee
J.T. Wood, Co-Chair, NAESB Business Practices Subcommittee and Co-Chair, NAESB Electronic Scheduling Subcommittee/Information Technology Subcommittee

May 2, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.vi**
Request Title:	**Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13**

1. RECOMMENDED ACTION:

___Accept as requested
___Accept as modified below
_X_Decline

EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:

___Change to Existing Practice
___Status Quo

2. TYPE OF DEVELOPMENT/MAINTENANCE

Per Request:	**Per Recommendation:**
___Initiation	___Initiation
___Modification	___Modification
___Interpretation	___Interpretation
___Withdrawal	___Withdrawal
___Principle	___Principle
___Definition	___Definition
___Business Practice Standard	___Business Practice Standard
___Document	___Document
___Data Element	___Data Element
___Code Value	___Code Value
___X12 Implementation Guide	___X12 Implementation Guide
___Business Process Documentation	___Business Process Documentation

3. RECOMMENDATION

SUMMARY:

The Joint ESS/ITS & BPS subcommittee reviewed the 2008 WEQ Annual Plan Item:

2.b.vi Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13.

This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development.

May 2, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.vi**
Request Title:	**Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13**

After thorough review of the documentation and discussions with NERC, the subcommittee has determined no further NAESB Business Practice standards are required for this Annual Plan Item.

Prior to making this decisions:

- The subcommitee co-chairs received an email from Andy Rodriquez of NERC indicating that there was no additional work required associated to the SAR for FAC-012 and FAC-012 http://www.naesb.org/pdf3/weq_atc_afc050108w4.txt.
- The NAESB Joint ESS/ITS & BPS subcomittee met with the NERC ATC Drafting Team on May 1, 2008, to discuss the SAR to identify if there were any items associated to this SAR which were not included in MOD's 001, 004, 008, 028, 029, and 030. There was only one concern raised during this conference call as to whether the NAESB Joint Subcommittee had addressed MOD 003.
- The Joint ESS/ITS & BPS also met in a separate meeting on May 1, 2008, to review this annual plan item. In this meeting concern was raised as to whether MOD 003 had been addressed. It was pointed out that the subcommitee had discussed MOD 003 in detail and reached a decision in 2007 on how to proceed with incoporating MOD 003. Upon review of the May 3, 2007 Final Meeting Minutes, the Joint subcommittee determined (on May 1, 2008) that MOD 003 had been addressed by NAESB and had been appropriately included in the ATC Information Link Recommendation.

The Joint Subcommittee is recommending that no additional NAESB Business Practice Standards be developed in support of this annual plan item. The joint subcommittee has opted to take no action on these annual plan item, as the requirements have been addressed in previously submitted FERC Order 890 recommendations.

RECOMMENDED STANDARDS:

No new standards are recommended.

4. SUPPORTING DOCUMENTATION

a. Description of Request:

WEQ 2008 Annual Plan Item:

May 2, 2008

RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE

For Quadrant:	**Wholesale Electric Quadrant**
Requesters:	**ESS/ITS/BPS Subcommittee**
Request No.:	**2008 WEQ Annual Plan Items 2.b.vi**
Request Title:	**Business practice standards to complement new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13**

2.b.vi Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13.

This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development.

b. Description of Recommendation:

No additional NAESB Business Practices need to be developed to support this WEQ 2008 Annual Plan Item.

c. Business Purpose:

Meet business practice requirements associated with the NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13.

d. Commentary/Rationale of Subcommittee(s)/Task Force(s):

1. The NERC Standards Authorization Request associated to this Annual Plan Item is posted at: Sup ATC SAR Draft 2 - Clean - 8/3/07
2. Documents reviewed by the Joint Subcommittee include:
   - Email from Andy Rodriquez dated April 22, 2008 http://www.naesb.org/pdf3/weq_atc_afc050108w4.txt
   - Joint ESS/ITS & BPS May 3, 2007 Final Meeting Minutes
3. The following documents include discussion and the disposition of WEQ 2008 Annual Plan Item 2.b.vi:
   - Joint NERC/NAESB AFC/ATC May 1, 2008, Draft Meeting Minutes
   - Joint WEQ ESS/ITS & BPS May 1, 2008, Draft Meeting Minutes
   - BPS/ESS/ITS Motions 2.b.vi Recommendations: http://naesb.org/pdf3/weq_atc_afc050108a1.doc

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

TAB 5

Specific Issues Updates

- The synopsis of specific standards development activities is included. The materials are provided for discussion purposes and no action is required of the WEQ EC members. Updates are provided for:
  - Order No. 890 Plan: Plan, Progress Report, Action Items
  - DSM-EE efforts: Activity Report
  - FERC Order No. 698 effort: Activity Report
  - eTariff Update: Activity Report
- The materials in Tab 5 correspond to agenda item 5.

	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
ATC GROUP ASSIGNMENTS (ESS/ITS and BPS)				
243, 244, 246	Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitment (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard* Paragraphs 243, 244, and 246 will require coordination with the NERC Order 890 reliability standards development *Posting requirements for ETC assigned to ESS/ITS (see 2008 AP 2(a)(vi)(4) and Order 890 WP, Group 6) Order 890-A: 63. The Commission also found that inclusion of all requests for transmission service in ETC would likely overstate usage of the system and understate ATC. The Commission therefore found that reservations that have the same point of receipt (POR) (generator) but different point of delivery (POD) (load), for the same time frame, should not be modeled in the ETC calculation simultaneously if their combined reserved transmission capacity exceeds the generator's nameplate capacity at the POR. The Commission directed public utilities, working through NERC, to develop requirements in MOD-001 that lay out clear instructions on how these reservations should be modeled. The Commission also concluded that some elements of ETC are candidates for business practices instead of reliability standards and directed public utilities, working through NAESB, to develop business practices necessary for full implementation of the MOD-001 reliability standard. 151. We decline to impose additional posting requirements regarding ETC uses, as requested by EPSA and Powerex. In Order No. 890, the Commission required transmission providers to make available all data used to calculate ATC for constrained paths and any system planning studies or specific network impact studies performed for customers. This would include information regarding ETC uses, including grandfathered agreements, that affect ATC calculations or study results. EPSA and Powerex fail to demonstrate that it is necessary to require the posting of additional information regarding ETC uses to verify the accuracy of the transmission provider's ATC calculations. We note in response to Powerex that, if any new service taken upon expiration of a pre-Order No. 888 contract, the terms and conditions of the transmission provider's OATT would apply.	WEQ 2008 Annual Plan Item 2(b)(ii)(1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: July, 2008 RATIFICATION: August, 2008	The NAESB ESS/ITS and BPS are working to draft complementary business practices to the NERC MOD028, MOD029, and MOD030, which includes ETC. The NERC team has determined that there is not a need for explicit posting of ETC values; the ESS/ITS and BPS supports the decision. ESS/ITS/BPS will look at the NERC MODs to determine if additional business practices are needed for ETC components.

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
293	• Business practice standards for accounting for **counterflows**. These standards will be included in the ATC business practice standards (Paragraph 293 will require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(ii)(2)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: July, 2008	The ESS/ITS and BPS have created a list of items that are considered post-backs to be used in the creation of post back requirements. NERC has requested that NAESB practices address post-back requirements. (8/16/07) On March 11-12, 2008, the ESS/ITS and BPS passed motions to define high level concepts for counterflows and post backs. Draft standards are being developed by sub-teams.

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
257	**Capacity Benefit Margin (CBM) Business Practices** • Business practice standards to set forth "how the CBM value shall be determined, allocated across transmission paths, and used" and how transmission providers will "reflect the set-aside of transfer capability as CBM in the development of the rate for point-to-point transmission service." (Paragraph 257 will require coordination with the NERC Order 890 reliability standards development) Order 890-A: 68. The Commission directed public utilities, working through NERC and NAESB, to develop clear standards and business practices for how the CBM value is determined, allocated across transmission paths and flowgates, and used. To ensure that CBM is used for its intended purpose, the Commission provided that CBM shall only be used to allow an LSE to meet its generation reliability criteria. The Commission rejected requests to allow CBM to be used to meet reserve-sharing needs, explaining that TRM is the appropriate category for that purpose. Public utilities were directed to work with NAESB to develop an OASIS mechanism that will allow for auditing of CBM usage. 83. The Commission did not mandate a particular methodology for allocating CBM over transmission paths and flowgates in Order No. 890. We therefore reject Southern's argument that development of a consistent methodology for calculating CBM would be harmful to LSEs because reserve needs vary from area to area. While we expect the NERC and NAESB process to produce a consistent and transparent process for setting aside and allocating CBM based on LSE requests, we decline to prescribe a specific method for how CBM should be obtained or allocated or otherwise determine the amount of capacity that the transmission provider has to set aside in response to requests from multiple LSEs.	WEQ 2008 Annual Plan Item 2(b)(iii)(1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: July, 2008	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD004. The ESS/ITS and BPS have identified the NAESB business practice standards that may be needed to address CBM, including where the CBM value shall be posted; how to allocate priority use of CBM; how to allocate the amount of CBM; the ability to audit CBM usage; a new request type on OASIS to distinguish a CBM reservation; and for the posting of CBM on the OASIS systemdata template.

	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
262	• Business practice standards that include an OASIS mechanism to "allow for auditing of CBM usage." (Paragraph 262 does not require coordination with the NERC Order 890 reliability standards development) Order 890-A: 68. The Commission directed public utilities, working through NERC and NAESB, to develop clear standards and business practices for how the CBM value is determined, allocated across transmission paths and flowgates, and used. To ensure that CBM is used for its intended purpose, the Commission provided that CBM shall only be used to allow an LSE to meet its generation reliability criteria. The Commission rejected requests to allow CBM to be used to meet reserve-sharing needs, explaining that TRM is the appropriate category for that purpose. Public utilities were directed to work with NAESB to develop an OASIS mechanism that will allow for auditing of CBM usage.	WEQ 2008 Annual Plan Item 2(b)(iii)(2)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: July, 2008 RATIFICATION: August, 2008	The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for CBM, including auditing of CBM usage. 8/16/07 If we are using existing templates and the existing templates have corresponding "Audit Templates", additional work may not be needed.
	• Any additional business practice standards needed to complement the NERC CBM reliability standards (MOD004) created as a result of this effort. (This item is a catchall section in case there are areas where business practices are needed as a result of the NERC CBM reliability standards. This item will require coordination with the NERC Order 890 reliability standards development).	WEQ 2008 Annual Plan Item 2(b)(iii)(3)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2ND Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: July 2008	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD004.

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
272	• Transmission Reliability Margin (TRM): Business Practice Standards to complement the NERC reliability standards for TRM (Paragraph 272 will require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(iv) (1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD008. The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for TRM, 8/16/07 The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 3/31/08. Recommendation posted for 30-day formal comment period on April 8th.

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
273	• The TRM business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM (Paragraph 273 will require coordination with the NERC Order 890 reliability standards development) Order 890-A: 94. The Commission clarifies that NERC was not directed to identify an actual number or a particular methodology to include in the TRM standards, MOD-008-0 and MOD-009-0. The Commission's intent was to require NERC and NAESB to include consistent criteria and guidelines in the calculation and uses of TRM by transmission providers. Likewise, in response to Southern's concern regarding flexibility to use something other than the ratings reduction method discussed in Order No. 890, we clarify that the ratings reduction method is only an example of a simple method that could be used. Our intent is not to prohibit a transmission provider from using a more sophisticated method, so long as it is consistent with the reliability standards developed by NERC.	WEQ 2008 Annual Plan Item 2(b)(iv)(2)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: NA	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD008. The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for TRM, 8/16/07 The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 3/31/08. Recommendation posted for 30-day formal comment period on April 8th.

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
	• Any additional business practice standards needed to complement the NERC TRM reliability standards (MOD008) created as a result of this effort (This item is a catchall section in case there are areas where business practices are needed as a result of the NERC TRM reliability standards. This item will require coordination with the NERC Order 890 reliability standards development).	WEQ 2008 Annual Plan Item 2(b)(iv)(3)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS have begun identifying complementary business practices to NERC MOD008. The ESS/ITS and BPS are continuing to evaluate and review the templates and practices for TRM, 8/16/07 The ESS/ITS and BPS determined no additional standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 3/31/08. Recommendation posted for 30-day formal comment period on April 8th.
301	Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)): • Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards (Paragraph 301 will require coordination with the NERC Order 890 reliability standards development) Order 890-A: 53. We clarify in response to NorthWestern that TRM may be used to accommodate the procurement of ancillary services used to provide service under the pro forma OATT. We deny as premature EPSA's and Williams' requests for clarification regarding the realtime determination and posting of ATC and AFC values, as well as posting of utilization of transmission provider's own system ETC. In Order No. 890, the Commission required an exchange of the data both for short and long-term ATC/AFC calculation that will increase the	WEQ 2008 Annual Plan Item 2(b)(v)(1)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS has drafted several sets of language and is in the process of coordinating alignment with the NERC ATC Drafting Team. The ESS/ITS and BPS are drafting documents that will facilitate agreement on concepts/scope. The ESS/ITS and BPS determined no additional

	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
	accuracy of ATC calculations.[33] The Commission also required that ATC be recalculated by all transmission providers on a consistent time interval, and in a manner that closely reflects the actual topology of the system, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data, and that NERC/NAESB revise the related reliability standard and business practices accordingly.[34] EPSA and William should address their concerns through the NERC and NAESB processes implementing these requirements. 60. Order No. 890 requires NERC and NAESB to develop a single set of ATC-related standards that will apply to all transmission providers, including RTOs and ISOs. We understand that the NERC ATC standard drafting team includes representatives from various industry sectors, including RTOs/ISOs, and we encourage NYISO to participate in the standard development process to provide NERC an opportunity to address its concerns. To the extent NYISO feels its concerns are not address in this process, it should bring the issue to the Commission's attention on review of the resulting reliability standards. 101. The Commission directed public utilities, working through NERC and NAESB, to revise reliability standard MOD-001 to require ATC to be recalculated by all transmission providers on a consistent time interval and in a manner that closely reflects the actual topology of the system, e.g., generation and transmission outages, load forecast, interchange schedules, transmission reservations, facility ratings, and other necessary data. The Commission stated that this process must also consider whether ATC should be calculated more frequently for constrained facilities. 104. The Commission agrees with Powerex that the standards adopted through the NERC and NAESB processes should serve as minimum or "no less frequent than" requirements to recalculate ATC. Transmission providers also must update their ATC calculation when they receive substantial and material changes in data, such as updated load forecasts, changes in topology and dispatch patterns, which may be more frequent than the NERC and NAESB standards would otherwise require. In the absence of substantial and material changes in data, transmission providers are not required to update ATC on a more frequent basis than the minimum frequency that the NERC and NAESB standards require, once implemented. The Commission will consider the adequacy of the time frame for ATC updates on review of these standards. 148. In Order No. 890, the Commission required transmission providers to make available, upon request, all data used to calculate ATC, TTC, CBM and TRM for any constrained posted path. We believe that this adequately addresses Constellation's request for access to modeling data used by the transmission provider. Specifically, we expect transmission providers to make available, upon request and subject to appropriate confidentiality protections and CEII requirements, the following modeling data: (1) load flow base cases and generation dispatch methodology; (2) contingency, subsystem, monitoring, change files and			standards needed to be developed for this item and voted for the co-chairs to develop recommendation and post formal comments 4/16/08. Recommendation posted for 30-day formal comment period on April 23rd.

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	Order 890 Work Plan			
Order Cite	**Action Item/Work Plan**	**Action Item Home**	**Target Dates**	**Status**
	accompanying auxiliary files; (3) transient and dynamic stability simulation data and reports on flowgates which are not thermally limited; (4) list of transactions used to update the base case for transmission service request study; (5) special protection systems and operating guides, and specific description as to how they are modeled; (6) model configuration settings; (7) dates and capacities of new and retiring generation; (8) new and retired generation included in the model for future years; (9) production cost models (including assumptions, settings, study results, input data, etc.), subject to reasonable and applicable generator confidentiality limitations; (10) searchable transmission maps, including PowerWorld or PSSE diagrams; (11) OASIS names to Common Names table and PTI bus numbers; and, (12) flowgate and interface limits including limit category (thermal, steady state or transient, voltage or angular). We decline, however, to require the transmission provider to post this information on OASIS, as Constellation suggests. We conclude that making this information available on request provides sufficient transparency for customers without unduly burdening the transmission provider. 149. With regard to the modeling support information sought by Constellation, we believe much of this information should already be stated in each transmission provider's Attachment C. In Order No. 890, the Commission required each transmission provider to set forth in the Attachment C to its OATT the ATC calculation methodology used by the transmission provider. To the extent necessary, we clarify that the step-by-step modeling study methodology and criteria for adding or eliminating flowgates (permanent and temporary) is part of the ATC methodology that must be stated in the transmission provider's Attachment C. We direct any transmission provider that has failed to include this information in its Attachment C to include that information as part of the compliance filing directed in section II.C. If the transmission provider has already satisfied this obligation in a previous compliance filing, it should refer to that filing instead. 150. We deny as premature Constellation's request to require OASIS postings of additional model benchmarking and forecasting data/TSR study audit data. Such information would be utilized in the process of updating and benchmarking models to actual events, which is the subject of ongoing efforts to modify relevant reliability standards from the MOD and facilities design, connections and maintenance (FAC) groups. 152. We deny TDU Systems' request to require transmission providers to grant customers access to proprietary modeling software used to calculate ATC values. The Commission believes at this time that the requirements of Order No. 890 are sufficient to achieve the Commission's transparency goals without further requiring the disclosure of proprietary software.			

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310	• Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards including any OASIS posting requirements to achieve the data exchange (Paragraph 310 will require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(v)(2)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	NERC will be addressing data exchange standards and will identify any new OASIS posting requirements or template query requirements which are needed in order to facilitate data exchange for ATC modeling **On March 13, 2008 the ESS/ITS and BPS determined the work associated to this item has been completed by NERC and recommended no further action be taken by NAESB.** Recommendation posted for 30-day formal comment period on March 17th. If the "decline" recommendation is approved by the EC the recommendation will not require membership ratification.

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369	• Business practice standards that will set forth how transmission providers will post "explanations of the reason for a change in monthly and yearly ATC values on a constrained path." The standards will include a requirement that the transmission provider post the reason for the change in a narrative form. The posted information will include "the (1) specific events which gave rise to the change and (2) new values for ATC on that path (as opposed to all points on the network)." (Paragraph 369 will not require coordination with the NERC Order 890 reliability standards development) Although not specified in the WEQ 2008 AP, it is expected that this standard will also contain requirements associated with annotations when ATC remains at zero for six months or longer. Order 890-A: 124. We believe that E.ON U.S. overestimates the burden of complying with this requirement. Since TTC standardization is ongoing, it is impossible to identify with precision the steps that will need to be taken to comply with the posting requirement. The appropriate forum to raise concerns regarding the burden of particular TTC calculation requirements is in the NAESB standards development process. In any event, we would expect that the posting of narratives for changes in monthly and yearly ATC values as a result of a 10 percent change in TTC will be triggered mainly by topology changes resulting from transmission lines and generator in-service status, as well as new facilities additions, that are reported on OASIS. 125. We clarify in response to Southern that transmission providers do not need to list each and every circumstance or occurrence that impacts TTC values from the previous month or year and, instead, may list the primary events that give rise to the update. Again, we expect that TTC changes will generally result from topology changes and, therefore, the primary reasons for an update would be changes in schedules of transmission or generation additions, prolonged outages, or changes in maintenance schedules causing a TTC change of 10 percent. We agree with Southern that the transmission provider should post these narrative explanations on OASIS via a template and data element that is to be defined by NAESB. We direct transmission providers, working through NAESB, to develop the OASIS functionality necessary for such postings. Pending completion of this work by NAESB, we direct transmission providers to post these narrative explanations as comments on OASIS.	WEQ 2008 Annual Plan Item 2(b)(v)(3)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	**Voted out of subcommittee for formal comment on February 13, 2008.** **Approved by the EC via notational ballot on April 14th.** **Membership ratification to be completed by May 16th.**

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413	• Business practice standards for posting on OASIS of the "underlying load forecast assumptions for all ATC calculations" (Paragraph 413 will not require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(v)(4)	**These dates are dependent on NERC providing responses to questions forwarded to NERC by the BPS/ESS/ITS.** FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	**Voted out of subcommittee for formal comment on March 10, 2008.** **Approved by the EC via notational ballot on April 23rd.**
405	• Business practice standards for posting on OASIS of the "actual daily peak load for the prior day." (Paragraph 405 will not require coordination with the NERC Order 890 reliability standards development)	WEQ 2008 Annual Plan Item 2(b)(v)(5)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd 2008	**Voted out of subcommittee for formal comment on March 10, 2008.** **Approved by the EC via notational ballot on April 23rd.**
	• Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13 (This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development).	WEQ 2008 Annual Plan Item 2 (b)(vi)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: N/A	The ESS/ITS and BPS is in the process of coordinating alignment with the NERC ATC Drafting Team. On May 1, 2008, the subcommittee determined no additional standards were required for this work plan item.

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	• Business practice standards to set forth the procedure for input on TTC and ATC methodologies and values. (During the Order 890 NERC and NAESB joint standards development effort, it was determined that the standards contained in MOD003 should be business practice standards instead of reliability standards. NERC has requested that NAESB adopt the standards as business practices via correspondence to Ms. McQuade, NAESB President.) This item will require coordination with the NERC Order 890 reliability standards development because the language to address this item is contained within a draft standard that addresses items that are dependent on NERC deliverables, i.e., the requirements to create an "ATC Information Link" on OASIS. There is no Order 890 cite for this item.	WEQ 2008 Annual Plan Item 2 (b)(vii)	**These dates are dependent on NERC deliverables and may be changed if NERC timelines for Order 890 are changed**: FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	**Voted out of subcommittee for formal comment on March 13, 2008.**
	Develop any additional business practice standards to support transparency reporting and related functions that may be required as a result of the final order.	WEQ 2008 Annual Plan Item 2(c)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: July 2008	The ESS/ITS and BPS continue to review the need for additional business practice standards. The ATC information list was posted for informal comment on January 22, 2008.

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ESS/ITS ASSIGNMENTS				
	GROUP 0: RESALES			
815, FN 496	The OASIS business practices developed to align the existing NAESB standards with Order 890 will include the requirement that "all sales or assignments of capacity be conducted or otherwise posted on the transmission provider's OASIS on or before the date the reassigned service commences." The OASIS business practices will also conform to Footnote 496 of Order 890. The business practices will include the requirement that the assignee "execute a service agreement directly with the transmission provider." In addition, the business practices will include the requirement that the assignee pay "the transmission provider for service at the negotiated rate and the transmission provider will bill or credit the assignor with any the difference between the negotiated rate and the assignor's original rate. Order 890-A: 394. Reforms to the rules governing reassignments and associated reporting obligations also increase our regulatory oversight of the secondary market, allowing the Commission to effectively monitor that market for any attempts to exercise market power. All reassignments must now be conducted through or otherwise posted on OASIS and assignees must execute service agreements prior to the date on which service commences. Transmission providers must provide information regarding reassignments in their EQRs. As noted above, Commission staff will also closely monitor the quarterly reassignment-related data submitted by transmission providers and prepare a report on staff's findings for the Commission's consideration. The Commission takes seriously the possibility that resellers may attempt to exercise market power in the secondary market for transmission capacity. We continue to believe, however, that the regulatory protections in place and our increased oversight of this market will limit the potential for market power abuse during the period in which the price cap is lifted. There is no need for particularized market power studies regarding secondary transmission capacity, as suggested by TAPS. 408. As noted above, the Commission required in Order No. 890 that all sales or assignments of capacity be conducted through or otherwise posted on the transmission provider's OASIS on or before the date the reassignment commences. The Commission thus eliminated the ability of transmission customers to assign transmission rights to another party with subsequent notification to the transmission provider. The Commission also directed transmission providers, working through NAESB, to develop appropriate OASIS functionality to allow such postings. Transmission providers were not required to implement this new OASIS functionality or any related business practices until NAESB develops appropriate standards.	WEQ 2007 Annual Plan Item 2(a)(i)	FORMAL COMMENT: Posted for formal comment April 5, 2007 with comments due on May 4, 2007. WEQ EC VOTE: The WEQ Executive Committee adopted a revised recommendation during the May 8, 2007 WEQ EC meeting. RATIFICATION: The recommendation, as revised by the WEQ Executive Committee was posted for member ratification on June 22, 2007 with ballots due on July 23, 2007. The ratification results are posted on the NAESB website.	Completed. The final action is posted on the NAESB WEQ Final Actions page: 2007 WEQ Annual Plan Item 2 Final Action - Recommendation for Revision to Final Action R04006D to align the Resales Standards with Order 890 The Subcommittee believes the final action conforms with Order 890-A.

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	422. The Commission affirms the decision in Order No. 890 to require assignees to execute a service agreement with the transmission provider governing reassignments of transmission capacity prior to scheduling use of that capacity. We provide clarification of this requirement, however, in response to the concerns raised by petitioners. In Order No. 890, the Commission required that all reassignments be accomplished by the assignee executing a service agreement with the transmission provider that will govern the provision of reassigned service. The Commission did not intend to impose contracting obligations that are more onerous than the acquisition of primary transmission capacity, which may be accomplished through execution of a service agreement followed by scheduling on OASIS. We clarify that it is equally sufficient for an assignee to execute a service agreement governing its reassignments of capacity generally and to complete a particular assignment through the OASIS. However, as with reservations of primary transmission capacity, there remains a threshold requirement to execute a service agreement with the transmission provider in order to commit the assignee to abide by the terms and conditions of the transmission provider's OATT governing the reassignment of transmission service. 423. It would not be appropriate to relieve assignees of the obligation to execute a service agreement with the transmission provider since such agreements establish the necessary contractual relationship between the assignee and the transmission provider. As we explain above, sales of reassigned capacity now take place under the transmission provider's OATT and, thus, there must be a contractual relationship between these parties. This does not mean, however, that all of the terms and conditions of a particular assignment must be stated in the service agreement. Like short-term firm and non-firm reservations of primary capacity, the transmission provider and assignee may rely on OASIS to provide information regarding the reseller, quantity, and price associated with a particular reassignment of service. This information would then become part of the binding agreement between the transmission provider and assignee governing the assignment, just as confirmation of short-term firm and non-firm transactions on OASIS constitute binding contractual commitments. Because execution of a service agreement with the transmission provider governing reassignments of capacity is a threshold requirement for an assignee wishing to accomplish a particular reassignment on OASIS, Bonneville's concern regarding the failure of an assignee to return its service agreement is misplaced. The assignee in that instance would have no right to schedule a reassignment on OASIS since it has not first executed the appropriate service agreement with the transmission provider. 424. Some of the confusion regarding these contracting requirements may have been caused by the Commission's reference in section 23.1 of the revised pro forma OATT to a service agreement "that will govern the provision of reassigned service," which could be interpreted to refer to transaction-by-transaction service agreements for reassignments. Inclusion of the words "Long-Term Firm" in both the title of the form of service agreement			

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	and the attached specifications in the new Attachment A-1 to the pro forma OATT adopted in Order No. 890 may have added to the confusion by potentially implying that use of the service agreement is limited to long-term firm point-to-point transactions instead of also applying to short-term firm point-to-point and non-firm point-to-point reassignments, as intended by the Commission. We revise section 23.1 of the pro forma OATT and the title of Attachment A-1 to make clear that use of the form of service agreement for reassigned capacity, and associated posting of schedules and transaction information on OASIS, should be similar to the use of such agreements for primary capacity. 425. The execution of a service agreement by the assignee does not itself terminate the reseller's service agreement, as EEI argues. The reseller's service agreement remains in place, granting the reseller scheduling rights for the reserved capacity and obligating the reseller to pay for that reservation. During the term of the assignment, the reseller will continue to be billed under its agreement with the transmission provider. The assignment of service simply transfers to the assignee some or all of the reseller's scheduling rights for the period of the reassignment and, in return, obligates the assignee to pay the transmission provider the negotiated rate. In order to prevent over-recovery by the transmission provider, the transmission provider must therefore credit the reseller the reassignment rate, which leaves the reseller with the net difference between the resale rate and the reseller's original rate. If the assignee defaults and fails to pay for the reassigned capacity, the transmission provider should reverse the credit to the reseller to reflect the lack of payment by the assignee. 426. We disagree that these billing requirements are unduly burdensome. While it is true that the transmission provider may be required to bill at different rates, that is already the case under the pro forma OATT. Transmission providers are permitted to offer discounts from the rates stated in their OATT, provided they offer such discounts to all eligible customers. Offering discounts thus creates different rates for different customers depending on when they negotiate service. The transmission provider therefore should already have mechanisms in place to bill customers based on rates other than those stated in its OATT. In any event, the need to bill assignees directly for reassignments is inextricably linked to the decision to require that all reassignment transactions take place pursuant to the rate on file in the transmission provider's OATT, rather than bilateral agreements between customers. We therefore do not intend for the discount rule or the price ceilings otherwise stated in the transmission provider's OATT to apply to reassignments of capacity. We have revised schedules 7 and 8 of the pro forma OATT accordingly. 427. We clarify that, to the extent necessary, the costs incurred by the transmission provider to account and bill for reassignments of transmission capacity should be included in the transmission provider's cost of service, just like accounting and billing costs for any other service under the transmission provider's OATT. We decline MidAmerican's request to			

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	prohibit further assignments of reassigned capacity. Order No. 888 allowed for multiple reassignments under the pro forma OATT and MidAmerican does not justify departing from this practice. Just as the original transmission customer may find that it has excess capacity it can reassign, so may an assignee. Denying the assignee's right to further assign its scheduling rights would inhibit customers who value the capacity most from accessing it and thereby contradict the Commission goal of creating a competitive secondary market for transmission capacity. 428. With regard to OASIS modifications necessary to allow for the reassignment of transmission capacity, the Commission in Order No. 890 already directed transmission providers working through NAESB to develop appropriate OASIS functionality to allow for reassignment-related postings. We understand that this work is on-going and expect any necessary modifications to NAESB's business practices that are necessary to reflect our rulings in this order will be adopted prior to the submission of those standards for Commission review. In the interim, transmission providers should identify in their business practices any procedures necessary to accomplish the reassignment of capacity by their customers.			
	GROUP 1: POSTING OF ETC; ANNOTATIONS FOR ATC; LOAD FORECAST AND ACTUAL LOAD; RE-BID OF PARTIAL SERVICE; PRECONFIRMATION PRIORITY; and CONDITIONAL FIRM			
	Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority S&CP Requirements	WEQ 2008 Annual Plan Item 2(a)(i)(1)	FORMAL COMMENT: Sent during the 3rd Quarter 2008. WEQ EC VOTE: EC notational ballot due January 16, 2008. RATIFICATION: The ratification of the Recommendation will be completed during 1st Quarter 2008.	
1078	**Conditional Firm:** In Paragraph 1078 of Order 890, the Commission directed transmission providers to "assign short-term firm service to conditional firm customers as the service becomes available." The Commission also directed transmission providers to work with NAESB to "develop the appropriate communications protocols to implement this attribute of conditional firm service." NAESB will develop OASIS business practices (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1))that will implement the ability to assign short-term firm service to conditional firm customers. Development of communication protocols for conditional firm including tracking mechanism and regional variation. Need to review the tagging rules related to the use of conditional firm.	WEQ 2008 Annual Plan Item 2(a)(i)(2)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Initial working paper of draft requirements to be posted in April 2008. On April 4, 2008, the ESS/ITS voted to send this recommendation out for informal comments due April 11, 2008.

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	Order 890-A: 566. During non-conditional periods, conditional firm service is subject to pro rata curtailment consistent with curtailment of any other long-term firm service. During the hours or specific system conditions when conditional firm service is conditional, conditional firm service share the same curtailment priority as secondary network service. In such circumstances, transmission providers will be allowed to curtail only for reliability reasons and conditional firm customers during conditional curtailment hours will be curtailed only after all point-to-point non-firm customers have been curtailed. If the customer selects the annual hourly cap option, the transmission provider will have the flexibility to conditionally curtail the customer for any reliability reason during those hours, including but not limited to, the system condition(s) identified in the system impact study. 567. The Commission provided that short-term firm service reserved prior to the reservation of conditional firm service will maintain priority over conditional firm service in the periods when conditional firm service is conditional, i.e., when specified system conditions exist or conditional curtailment hours apply. Transmission providers were directed to work with NAESB to develop the appropriate communications protocol to allow for automatic assignment of short-term firm point-to-point service to conditional firm customers to the extent short-term service becomes available. Transmission providers need not implement this requirement until NAESB develops appropriate communications protocols. 569. Finally, the Commission recognized that there may be some regional variation in the way transmission providers approach the provision of conditional firm service beyond the minimum attributes that established in Order No. 890. The Commission directed transmission providers located in the same region to coordinate among themselves to develop business practices for implementation of the conditional firm service. In order to allow time for this regional coordination, the Commission directed transmission providers to implement these mechanisms and business practices within 180 days after the publication of this Final Rule in the Federal Register, or October 11, 2007. 585. We also agree with MidAmerican that a transmission provider's waiver of a reassessment for conditional firm or planning redispatch service does not constitute a waiver of all reassessments for the duration of the service, unless explicitly agreed to by the transmission provider. We reiterate, however, that only one reassessment may be performed in each two-year period of service. We also affirm that any waiver must be granted for similarly situated service, which would include conditional firm or planning redispatch service that is limited because of the same constraints or general system limitations. Such a waiver would be an act of discretion that must be posted on OASIS. Waiver of the reassessment presents an opportunity for discrimination among classes of customers on the part of the transmission provider and posting will provide eligible customers with an indicator of how often conditions or redispatch requirements have been reassessed.			

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	Transmission providers are directed to develop uniform OASIS posting standards, in coordination with NAESB, for transmission providers to post information regarding waivers of the biennial reassessment for planning redispatch and conditional firm service.			
369	**Annotations for ATC:** OASIS Business Practice Standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) that will "require that the transmission provider post a brief, but specific, narrative explanation of the reason for a change in monthly and yearly ATC values on a constrained path." The posting requirements will include posting of "(1) specific events which gave rise to the change and (2) new values for ATC on that path (as opposed to all points on the network)."	WEQ 2008 Annual Plan Item 2(a)(i)(3)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Assigned to BPS/ESS/ITS (see above BPS/ESS/ITS item that reference WEQ 2008 AP Item 2(b)(v)(3)). **Voted out of subcommittee for formal comment on February 13, 2008.** **Approved by the EC via notational ballot on April 14th.** **Membership ratification to be completed by May 16th.**
416	**Load Forecast and Actual Load:** OASIS Business Practice Standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) for the posting of "load forecasts and actual daily peak load for both system-wide load (including native load) and native load."	WEQ 2008 Annual Plan Item 2(a)(i)(4)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Assigned to BPS/ESS/ITS (see above BPS/ESS/ITS item that reference WEQ 2008 AP Items 2(b)(v)(4) and (5)). **Voted out of subcommittee for formal comment on March 10, 2008.** **Approved by the EC via notational ballot on April 23rd.**
1378	**Re-bid of Partial Service:** OASIS Business practice standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) for re-bid of partial service across a single Transmission Provider's system.	WEQ 2008 Annual Plan Item 2(a)(i)(5)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	**Voted out of subcommittee for formal comment on 2/12/2008.**

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1392, 1401	**Pre-confirmation Priority:** Development of OASIS business practice standards (to complement the OASIS S&CPs developed in 2008 AP item 2(a)(i)(1)) to prohibit "transmission customers from changing a request into a pre-confirmed request and requiring OASIS platforms to be accessible on non-Windows/Explorer computers." **Pre-confirmation Priority:** Development of OASIS Business Practice Standards and OASIS S&CPs so that "pre-confirmed non-firm point-to-point transmission service requests and short-term firm point-to-point transmission service requests" have priority though "longer duration requests for transmission service will continue to have priority over shorter duration requests for transmission service." The standards will be written such that pre-confirmation will serve as a "tie-breaker" when the requests are of equal duration.	WEQ 2008 Annual Plan Item 2(a)(i)(6)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	**Voted out of subcommittee for formal comment on 2/12/2008.**
	Appendix C – OASIS Exemptions	WEQ 2008 Annual Plan Item 2(a)(i)(7)	FORMAL COMMENT: **Voted out of subcommittee 12/17/2007. Formal Comment period 12/19/2007 through 1/19/2008.** WEQ EC VOTE: Approved February 4, 2008 RATIFICATION: Ratification period to close 3/13/2008	Ratified by the membership on 3/13/2008.
	GROUP 2: METRICS; REDISPATCH COST POSTING			
413	**Metrics:** Business Practice standards s to "post on OASIS metrics related to the provision of transmission service under the OATT" including the posting of: • "the number of affiliate versus non-affiliate requests for transmission service that have been rejected"; • "the number for affiliate versus non-affiliate requests for transmission service that have been made"; These standards will also set forth in the above referenced posting requirements the length of the service request and the type of the service requested	WEQ 2008 Annual Plan Item 2(a)(ii)(1)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	**Voted out of subcommittee for formal comment on 2/12/2008.**
1318	**Metrics:** OASIS business practice standards to implement the standard performance (planning study) metrics set forth in Order 890, Paragraphs 1308-1317.	WEQ 2008 Annual Plan Item 2(a)(ii)(2)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	**Voted out of subcommittee for formal comment on 2/12/2008**

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1162	**Redispatch Cost Posting:** Business practices for redispatch cost postings: • The posting of redispatch information will also include the posting of each transmission provider's "monthly average cost of redispatch for each internal congested transmission facility or interface over which it provides redispatch service using planning redispatch or reliability redispatch under the pro forma OATT." • The business practice standards for redispatch cost postings will also include functionality for transmission providers to post "a high and low redispatch for the month" each internal congested transmission facility or interface over which it provides redispatch service. Order 890-A: 621. Transmission providers must post internal constraint or interface data for the month if any planning redispatch or reliability redispatch is provided during the month, regardless of whether the transmission customer is required to reimburse the transmission provider for those exact costs. Thus, if the transmission customer pays for planning redispatch pursuant to a negotiated fixed rate, the transmission provider is required to post and calculate the monthly average redispatch costs and the high and low costs in the month even though the transmission provider will bill the customer the fixed rate. The same posting requirement applies if the customer is paying a monthly "higher of" rate. The Commission concluded that the relevant reliability redispatch costs for posting purposes are those costs the transmission provider invoices network customers based on a load ratio share pursuant to section 33.3 of the pro forma OATT. The transmission provider must post this data on OASIS as soon as practical after the end of each month, but no later than when it sends invoices to transmission customers for redispatch-related services. The Commission directed transmission providers to work in conjunction with NAESB to develop this new OASIS functionality and any necessary business practice standards.	WEQ 2008 Annual Plan Item 2(a)(ii)(3)	FORMAL COMMENT: 1st Quarter, 2008 WEQ EC VOTE: 1st Quarter, 2008 RATIFICATION: 1st Quarter, 2008	**Voted out of subcommittee for formal comment on 2/12/2008**
	GROUP 3: NETWORK SERVICE ON OASIS			
385	Development of OASIS business practice standards and OASIS S&CPs for "transmission providers and network customers to use OASIS to request designation of new network resources and to terminate designation of network resources." Shall be posted on OASIS for 90 days and available for audit for a 5 year period.	WEQ 2008 Annual Plan Item 2(a)(iii)(1) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.

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385	The standards will include the ability to electronically query requests to designate and terminate network resources and will require development of OASIS templates and to allow for queries of all information provided with designation requests.	WEQ 2008 Annual Plan Item 2(a)(iii)(2) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
1477	The standards will include the ability to mask information "about operating restrictions and generating cost on OASIS"	WEQ 2008 Annual Plan Item 2(a)(iii)(3) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
1477	Development of OASIS business practice standards and OASIS S&CPs that describe the procedural requirements for submitting designations over any new OASIS functionality. Order 890-A: 919. The Commission clarifies, in response to South Carolina E&G's request, that the language in paragraph 1521 of Order No. 890 is only meant to be a paraphrase of the more detailed attestation to be provided in the pro forma OATT itself. A network customer designating network resources should submit an attestation using the language set forth in sections 29.2(viii) and 30.2 of the pro forma OATT, as amended in Order No. 890, not the language of the preamble. A network customer is not permitted to merely reference the applicable section of the pro forma OATT when completing the attestation requirement. If the OASIS customer comment section does not currently allow enough space for a network customer to provide its attestation, transmission providers should modify, in coordination with NAESB, OASIS functionality to accommodate the full attestation. In the interim, the transmission provider should identify alternate means, such as by telefax or e-mail, for the network customer to provide the attestation.	WEQ 2008 Annual Plan Item 2(a)(iii)(4) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.

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1504	Development of OASIS business practice standards and OASIS S&CPs to specify how designated network service informational postings are posted on OASIS . Develop details of how the view, download, and query requirements for information posted regarding network resource designations informational postings.	WEQ 2008 Annual Plan Item 2(a)(iii)(5) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
1532	Development of OASIS business practice standards and OASIS S&CPs to set forth the "treatment of OASIS requests when the customer fails to provide the necessary attestation," when submitting a request to designate a new network resource. Attestation: Formatting of attestation information that will be provided on OASIS.	WEQ 2008 Annual Plan Item 2(a)(iii)(6) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
1541	Development of OASIS business practice standards and OASIS S&CPs to describe "the procedural requirements for submitting both temporary and indefinite terminations of network resources, to allow network customers to provide all required information for such terminations." These business practice standards will include the functionality set forth in Order 890, Paragraph 1541.	WEQ 2008 Annual Plan Item 2(a)(iii)(7) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
1541	Development of OASIS business practice standards and OASIS S&CPs to describe "the procedures for submitting and processing requests for concomitant evaluations of transmission requests and temporary terminations.	WEQ 2008 Annual Plan Item 2(a)(iii)(8) See also WEQ 2008 Annual Plan item 3(a)(ii)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 3rd Quarter, 2008 RATIFICATION: 3rd Quarter, 2008	Concept Paper posted 11/7/2007.
	GROUP 4: CONDITIONAL FIRM; PRE-EMPTION; REQUEST R05019; and REVISIONS TO STANDARD 9.7			
1407	**Pre-emption:** Revise OASIS business practice standards and OASIS S&CPs so that "a new pre-confirmed request for transmission service would preempt a request of equal duration that has been accepted by the transmission provider but not yet confirmed by the transmission customer." It is the expectation that the business practice standards to address preemption will be developed in conjunction with NAESB Request No. R05019 to modify	WEQ 2008 Annual Plan Item 2(a)(iv)(1)	**REQUEST FOR RECONSIDERATION PENDING AT FERC MAY IMPACT TARGET DATES.** FORMAL COMMENT:3rd	Not Started

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	OASIS standards and OASIS S&CPs to clearly document the procedures used to implement the displacement/interruption terms of the Pro Forma tariff. This is consistent with NAESB Standard WEQ 001-4.25. **Order 890-A:** 814. The Commission affirms the decision in Order No. 890 not to change the "first-come, first served" nature of the reservation process and the right of first refusal. These policies have worked well in the past and, as we explain in Order No. 890, benefit transmission providers and customers alike by facilitating the administration of the reservation process and removing confusion about how to comply. 815. We disagree with Duke and TranServ that the right of first refusal policies should be revised based on complex hypotheticals involving the preemption of multiple short-term reservations. The complexities pointed to by these commenters do not by themselves warrant changing the right of first refusal rule. Even though we recognize the potential for complexities to arise under the right of first refusal rule, we believe them to be relatively limited. In the off-chance that multiple eligible customers with short-term reservations choose to exercise their right of first refusal for the same capacity simultaneously, the Commission believes that they should have a right to do so. 816. We therefore decline to expand upon the language of the pro forma OATT to account for every factual scenario that could arise under sections 13.2 and 14.2 of the pro forma OATT. Sections 13.2 and 14.2 of the pro forma OATT set forth adequate guidance for transmission providers to fairly administer competing requests, including the priorities for determining which reservations or requests trump one another as well as the timeframes for eligible customers to respond to competing requests. As noted above, we recognize that certain unique cases can present difficult allocation issues, but conclude that these extreme cases arise infrequently in the normal course of business. In the vast majority of cases, we believe the right of first refusal rules are efficient and easy to administer without further amending the governing tariff language, as Bonneville and Southern suggest. 817. To the extent necessary, the Commission clarifies that a "competing request" under sections 13.2 and 14.2 of the pro forma OATT may include a transmission service request that overlaps with only part of another existing transmission service reservation since both requests cannot be granted simultaneously. Accordingly, a "competing request" for purposes of sections 13.2 and 14.2 may also include a transmission service request for which transmission capacity cannot be accommodated without preempting one or more existing transmission reservations of parts thereof. 818. In response to TranServ and Duke, we clarify that sections 13.2 and 14.2 allow an eligible customer to retain its original reservation by matching the competing service request's cost or duration terms exactly or by exceeding one or more of the terms of a		Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	

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	competing transmission service request. Since any "match" by an eligible customer in response to a potentially preempting request, by definition, either exceeds the costs, duration or both of the eligible customer's original reservation, we do not believe eligible customers opting to match a competing request have a strong incentive, if any, to "match" a competing request with terms that exceed the competing request. Nevertheless, we do not see any harm resulting from a match that exceeds the exact terms of a competing request and therefore believe it would not be appropriate to preclude the ability of eligible customers to make such a request. 819. With regard to reassignments of capacity in the secondary market, we clarify that the associated right of first refusal under sections 13.2 and 14.2 of the pro forma OATT to match a competing transmission service request applies to the primary transmission service, not the reassignment of scheduling rights. Using TranServ's example, the reassignment of one day of a customer's weekly service would not cause the assignor or the assignee to match a competing three day request for service since the initial one week reservation already exceeded the competing request. The fact that one day of service has been reassigned does not alter the assignor's entitlement to use service for the remaining week reserved.			
	NAESB Request No. R05019: During the work to address FERC Order 890, the ESS/ITS will also use the opportunity to modify OASIS standards and S&CP to clearly document the procedures used to implement the displacement/interruption terms of the Pro Forma tariff as requested in NAESB Request No. R05019	WEQ 2008 Annual Plan Item 2(a)(iv)(2) R05019	**REQUEST FOR RECONSIDERATION PENDING AT FERC MAY IMPACT TARGET DATES.** FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started
1269	**Revisions to Standard 001-9.7:** NAESB will continue to work to revise NAESB WEQ business practice standard WEQ 001-9.7 (which addresses rollover rights for Redirected transmission service) to be consistent with the Commission's policies. **Order 890-A:** 697. Pursuant to Section 22 of the pro forma OATT, a transmission customer taking firm point-to-point service may modify its receipt and delivery points, i.e., redirect its service, on either a non-firm or firm basis. In Order No. 676, the Commission adopted the "Standards for Business Practices and Communication Protocols for Public Utilities" developed by the NAESB's Wholesale Electric Quadrant (WEQ). The WEQ standards include standards addressing requirements for redirects on both a firm and non-firm basis, all of which were incorporated by reference into the Commission's regulations except for WEQ Standard 001-	WEQ 2008 Annual Plan Item 2(a)(iv)(3)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	On February 11-12, 2008, the ESS/ITS voted to send this recommendation out for informal comments due March 25, 2008.

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	9.7, which addressed the impact of redirects on the rollover rights of a long-term transmission customer. Order No. 676 directed the WEQ to reconsider WEQ Standard 001-9.7 and develop a revised standard consistent with Commission policy. 698. In Order No. 890, the Commission affirmed reliance on the NAESB process to develop business practices implementing the Commission's redirect policy. The Commission also determined that the reforms adopted in Order No. 676, in combination with the OATT-related reforms adopted in this proceeding, were adequate to ensure that transmission providers do not engage in undue discrimination when a customer seeks to modify its receipt and delivery points on a firm basis. With respect to the effect of redirects on rollover rights, the Commission affirmed its policy allowing a redirect of firm, long-term service to retain rollover rights, even if the redirect is requested for a shorter period. The Commission concluded that a transmission customer should not have to choose between maintaining its rollover rights and redirecting on a firm basis. The Commission noted, however, that any change to a delivery point would be treated as a new request for service for purposes of determining availability of capacity. As a result, a redirect right does not grant the customer access to system capacity or queue position different from other customers submitting new requests for service. The Commission also provided guidance regarding the processing of, and pricing for, redirected service. 700. If the Commission decides to maintain rollover rights for redirects, MISO proposes the following limitations and requests the Commission to direct NAESB to draft its business practices accordingly. First, MISO suggests that the primary path agreement should have a term of at least five years for any rollover rights to attach. Second, MISO requests that any redirect must be for firm service for one year or longer. If the redirect is for a shorter period, MISO contends that the rollover rights should remain with the original path. Third, MISO requests redirected service to terminate on the same date as the parent service so as to maintain the timing for execution of rollover rights. Finally, MISO suggests that in order to execute a rollover right the redirected service must be requested and granted prior to the one-year deadline for the customer to request rollovers along the original path. 702. TranServ also requests clarification regarding the requirement for the rollover right to follow the redirect, regardless of the duration of the redirect. TranServ questions whether a redirect of a long-term firm service reservation for one day qualifies that customer for rollover rights on the redirected service points. TranServ suggests that the Commission instead restrict rollover rights on redirected service points to redirects of five years or longer and further require that the redirect be co-terminus with the original request being redirected. TranServ argues that more guidance regarding implementation of the rollover and redirect policies will facilitate the NAESB standards development process. 704. The Commission denies petitioners' requests to amend the rights of rollover customers to redirect their service. Under section 22.2 of the pro forma OATT, a request for a firm			

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	redirect must be treated like a request for new transmission service. As a new request for service, each redirect request is subject to the availability of capacity and subject to the possibility that the transmission provider may not be able to provide rollover rights on the new redirected path. The transmission provider is required to offer rollover rights to a customer requesting a firm redirect only if rollover rights are available on the redirected path, i.e., to the extent not restricted based on reasonable forecasts of native load growth or preexisting contracts that commence in the future. 705. As the Commission explained in Order No. 890, rollover rights follow the redirect regardless of the duration of the redirect. A transmission customer making a firm redirect request does not convert its original long-term firm transmission service agreement into two short-term service agreements, nor does it lose its rollover rights under its long-term firm transmission service agreement. At the same time, a customer can exercise its rollover right only at the end of the contract. Thus, if a customer with rollover rights chooses to redirect its capacity for less than the full remaining term of the contract, absent some further request to redirect, the original path will automatically be reinstated and rollover rights would remain on only the original path. By contrast, if the customer chooses to redirect its capacity until the end of its contract, the customer would have rollover rights along only the redirected path, and only to the extent not restricted based on native load growth or future contracts along the redirected path. 706. We therefore reject requests to restrict rollover rights to longer-term redirects. A long-term transmission customer may request multiple, successive redirects for firm service. This discretion is limited by the fact that each successive request is treated as a new request for service in accordance with section 17 of the pro forma OATT. Each request is therefore subject to the availability of capacity and subject to the possibility that the transmission provider may not be able to provide rollover rights on the new, redirected path. If the customer has not been granted rollover rights for a redirect that extends to the end of its contract, the redirected service will terminate on the same date as the parent service. 707. We also reiterate that a customer cannot exercise any rollover rights unless it first has provided the appropriate notice to the transmission provider. If a customer requests and is granted a rollover right prior to the relevant notice deadline (60 days for pre-Order No. 890 agreements or one year for all others) and subsequently requests and is granted a redirect for firm service for the remainder of the contract term (i.e., within the notice period), the new reservation governs the rights at the new receipt and delivery points and the customer can obtain rollover rights with respect to the redirected capacity to the extent rollover rights are available for the redirected points. If, however, a customer fails to request a rollover right prior to the relevant notice deadline, the customer forfeits rollover rights along the current or any redirected path. 708. We clarify, to the extent necessary, that transfer capability is not freed up for earlier			

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	queued service requests until a redirect has been granted. A redirect request must be evaluated in accordance with section 17 of the pro forma OATT using the same system assumptions and analysis applicable to any other new request for service, including whether sufficient ATC exists to accommodate the request. If there is insufficient ATC to offer service to customers in the queue, and an existing customer requests redirected service, any increase in ATC along the original path is contingent upon the acceptance and confirmation of the redirect. It cannot be assumed at the time of a redirect request that the transmission provider will grant the request.			
	GROUP 5: PARAGRAPH 1377			
1377	NAESB will develop business practice standards to facilitate the coordination of requests across multiple transmission systems using the principles set forth in Paragraph 1377 of Order 890. Develop S&CPs related to coordination of request across multiple transmission systems. Order 890-A: 762. The Commission also required transmission providers working through NAESB to develop business practice standards to better coordinate transmission requests across multiple transmission systems. In order to provide guidance to NAESB, the Commission articulated the principles that should govern processing across multiple systems. The Commission further required transmission providers working through NAESB to develop business practice standards to allow a transmission customer to rebid a counteroffer of partial service so the transmission customer can take the same quantity of service for linked transmission service requests across multiple systems. The Commission explained that the transmission customer should not be required to take the same quantity of service across consecutive transmission service requests and, instead, it should simply have the option to do so. 766. The Commission affirms the decision in Order No. 890 to rely on the NAESB process to develop business practices to govern the processing of transmission requests across multiple transmission systems. We decline to dictate at this time, beyond those principles outlined in Order No. 890, the particular practices that must be implemented. It is more appropriate to allow transmission providers working through NAESB, in the first instance, to consider how best to ensure coordination across multiple systems. It is also appropriate to give NAESB an open timeframe to develop these standards since they must be broad enough to account for the complexities of coordinating multi-system transmission service requests.	WEQ 2008 Annual Plan Item 2(a)(v)(1)	FORMAL COMMENT: 4th Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started

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1378	**Re-bid of Partial Service:** OASIS Business practice standards for re-bid of partial service across multiple Transmission Providers' systems. NAESB will develop business practice standards to "allow a transmission customer to rebid a counteroffer of partial service so the transmission customer is allowed to take the same quantity of service across all linked transmission service requests.	WEQ 2008 Annual Plan Item 2(a)(v)(2)	FORMAL COMMENT: 4th Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started
	GROUP 6: MISCELLANEOUS			
1390	NAESB plans to review the existing business functions set forth in the NAESB WEQ standards to determine if changes should be made to address Paragraph 1390 of Order 890. FERC: OATT is sufficient to allow a Transmission Provider to manage situations where the Transmission Customer modifies its application for service to the point that the request is "meaningfully different" than initial request. ESS/ITS: need to review if this has any impact on business functions.	WEQ 2008 Annual Plan Item 2(a)(vi)(1)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started
1627	Development of OASIS business practice standards and OASIS S&CPs for "the posting of additional curtailment information on OASIS" via a "detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. Posting of curtailment information on OASIS: develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. **Order 890-A:** 973. The Commission did not propose in the NOPR, or adopt in Order No. 890, any changes to the terms and conditions under which a transmission provider may curtail service to maintain reliable operation of the grid, as set forth in sections 13.6 and 14.7 for point-to-point service and section 33 for network service. The Commission did, however, conclude that the posting of additional curtailment information is necessary to provide transparency and allow customers to determine whether they have been treated in the same manner as other transmission system users, including customers of the transmission provider. Accordingly, the Commission required transmission providers, working through NAESB, to develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments, including all circumstances and events contributing to the need for a firm service curtailment, specific services and customers curtailed (including the transmission provider's own retail loads), and the duration of the curtailment.	WEQ 2008 Annual Plan Item 2(a)(vi)(2)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started

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1005	**Redispatch Cost Posting:** Business practices for redispatch cost postings: The business practice standards for redispatch cost postings will include OASIS business practices and any needed additions or revisions to the OASIS Standards & Communication Protocols (S&CPs) to allow for posting of third party offers of planning redispatch services. The business practice standards developed for redispatch cost postings may affect the existing NAESB business practice standards for Transmission Loading Relief. (moved from Group 2) Order 890-A: 568. Transmission providers also were directed to work with customers to facilitate the use of third party generation, where available, in provision of planning redispatch. To facilitate provision of redispatch service by third parties, the Commission further directed transmission providers, working through NAESB, to modify their OASIS sites and develop any necessary business practices to allow for posting of third party offers to provide planning redispatch. Again, transmission providers were not required to implement the new OASIS functionality and any related business practices until NAESB develops appropriate standards.	WEQ 2008 Annual Plan Item 2(a)(vi)(3)	FORMAL COMMENT: 3rd Quarter, 2008 WEQ EC VOTE: 4th Quarter, 2008 RATIFICATION: 4th Quarter, 2008	Not Started
243-244	**Posting of ETC:** OASIS business practice standards and S&CPs necessary to implement the Business Practice Standards developed to complement NERC Reliability Standards for **Existing Transmission Commitment (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard. (moved from Group 1)* *Requirements for a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses" is assigned to BPS/ESS/ITS (see above BPS/ESS/ITS item that references WEQ 2008 AP Items 2(b)(ii)(2)).	WEQ 2008 Annual Plan Item 2(a)(vi)(4)	FORMAL COMMENT: 2nd Quarter, 2008 WEQ EC VOTE: 2nd Quarter, 2008 RATIFICATION: 2nd Quarter, 2008	Not started. Task may be completed by BPS/ESS/ITS.

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	GROUP 7: Tagging for Conditional Firm Service, Submittal Windows			
Order 890-A, paragraph 592	**Tagging for CFS:** Within 180 days of Order 890-A publication, develop tracking capabilities and business practices for tagging for implementation of conditional firm service. **Order 890-A:** 592. We agree with petitioners that the NAESB rules regarding tagging do not allow a transmission provider to change the tag of a transmission customer. That is why, in Order No. 890, the Commission directed transmission providers to coordinate with other transmission providers in their regions to develop their own business practices to implement the tagging and tracking of conditional firm service. Upon consideration of petitioners' concerns, we grant rehearing to require transmission providers, in coordination with NERC and NAESB, to develop within 180 days of publication of this order in the Federal Register a consistent set of tracking capabilities and business practices for tagging for implementation of conditional firm service. We agree with petitioners that a consistent set of practices followed by the industry will reduce transmission provider discretion and bring uniformity in implementing conditional firm service. In the interim, the existing business practices of each transmission provider for tracking and tagging conditional firm service shall remain in effect.	WEQ 2008 Annual Plan Item 2(a)(vii)(1)	FORMAL COMMENT: WEQ EC VOTE: RATIFICATION:	Assigned to the ESS/ITS. Order 890-A publications date: January 16, 2008. On April 4, 2008, the ESS/ITS voted to send this recommendation out for informal comments due April 11, 2008.
Order 890-A, paragraph 805	**Submittal Windows:** Standardized practices for allocating capacity among requests received during a submittal window. **Order 890-A:** 805. The Commission recognizes that developing methods to allocate capacity among requests received during a submittal window may require detailed procedures, particularly when transmission requests received simultaneously exceed available capacity. As the Commission explained in Order No. 890, however, we believe that each transmission provider is in the best position to develop allocation procedures that are suitable for its system. This does not preclude transmission providers from working through NAESB to develop standardized practices, as suggested by Southern. For example, as we pointed out in Order No. 890, allocation methods such as that used by PJM to allocate monthly firm point-to-point transmission service could provide useful guidance in developing general allocation procedures.	WEQ 2008 Annual Plan Provisional Item 7	FORMAL COMMENT: WEQ EC VOTE: RATIFICATION:	

WEQ ESS/ITS & BPS 890 Progress Report

(Required for August 7, 2008 Filing)
Based on WEQ 2008 Annual Plan
As of May 5, 2008

Annual Plan Item	Annual Plan Item	Underway	Scheduled	Concept Discussion	Draft Recommen-dation	Subcommittee Review	Post Informal Comments	Review Comments	Subcommittee Final Review	Subcommittee Approval	NAESB Clean-up	Post for Formal Comments
2.a.i.3	Annotations For ATC Business Practice Stan											
2.a.i.4	Load Forecast And Actual Load Business Pra											
2.b.ii.1	Develop the Business Practice Standards cor											
2.b.ii.2	Business practice standards for accounting fo											
2.b.iii.1	Determine if business practice standards are											
2.b.iii.2	Business practice standards that include an C											
2.b.iii.3	Any additional business practice standards ne											
2.b.iv.1	Transmission Reliability Margin (TRM): Busi											
2.b.iv.2	The business practice standards will include s											
2.b.iv.3	Any additional business practice standards ne											
2.b.v.1	Business practice standards to address the f											
2.b.v.2	Business practice standards for data exchang											
2.b.v.3	Business practice standards that will set forth											
2.b.v.4	Business practice standards for posting on OA											
2.b.v.5	Business practice standards for posting on OA											
2.b.vi	Business practice standards to complement N											
2.b.vii	ATC Information Link/Transition of MOD-003											
2.c	Develop version 1 business practice standard											

LEGEND:

- Completed Prior to February EC Meeting
- Completed since February EC Meeting

OPEN ACTION ITEMS

BPS/ESS/ITS Action Items								
Issue #	**Item Number**	**Status**	**Description**	**Assigned to**	**Dates**			**Notes**
		O = Open					Meeting	
	(Request Number or	C = Closed					When will	
	Annual Plan Number)	H = On Hold			Assigned	Due	be Addressed	
33		C	Approve BPS/ESS/ITS 12/17/2007 meeting minutes	Subcommittee				Approved at May 1st meeting
34		C	Post Final BPS/ESS/ITS 12/17/2007 meeting minutes	NAESB Staff				Final meeting minutes werer posted on May 2nd.
35		O	Approve BPS/ESS/ITS 01/03/2008 and 01/04/2008 meeting minutes	Subcommittee		5/14/2008		
36		O	Post Final BPS/ESS/ITS 01/03/2008 and 01/04/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 35.
57		O	Draft Standards for OASIS Mechanism to Audit CBM Usage	JT Wood				
58		O	Post document provided by JT Wood (draft standards for OASIS mechanism to audit CBM usage)	NAESB Staff				Action item is dependent on the completion of Action Item 57.
59		O	Draft Request for Standards for OASIS Mechanism to Audit CBM Usage	JT Wood				
60		O	Post document provided by JT Wood (draft request for standards for OASIS mechanism to audit CBM usage)	NAESB Staff				Action item is dependent on the completion of Action Item 59.
78		O	Using the List of ATC Information, begin addressing which items should be confidential based on commercial concerns	Subcommittee				
80		O	Approve BPS/ESS/ITS 01/16-17/2008 meeting minutes	Subcommittee	1/17/2008			
81		O	Post Final BPS/ESS/ITS 01/16-17/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 80.
85		O	Approve BPS/ESS/ITS 01/28/2008 meeting minutes	Subcommittee	1/28/2008			
86		O	Post Final BPS/ESS/ITS 01/28/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 85.

OPEN ACTION ITEMS

BPS/ESS/ITS Action Items								
Issue #	**Item Number**	**Status**	**Description**	**Assigned to**	**Dates**			**Notes**
		O = Open					Meeting	
	(Request Number or	C = Closed					When will	
	Annual Plan Number)	H = On Hold			Assigned	Due	be Addressed	
93		O	Approve BPS/ESS/ITS 01/11/2008 meeting minutes	Subcommittee	1/11/2008			
94		O	Post Final BPS/ESS/ITS 01/11/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 93.
95		O	Publish and Post NERC/NAESB AFC/ATC Joint Call Draft Minutes from 2/8/2008	NAESB Staff	2/8/2008			
99		O	Approve BPS/ESS/ITS 02/13/2008 meeting minutes	Subcommittee	1/28/2008			
100		O	Post Final BPS/ESS/ITS 02/13/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 99.
103		O	Approve BPS/ESS/ITS 02/21-22/2008 meeting minutes	Subcommittee	2/22/2008			
104		O	Post Final BPS/ESS/ITS 02/21-22/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 101.
110		C	Post final meeting minutes of approved backlog of Joint NERC ATCDT/NAESB BPS/ESS/ITS meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 109. Backlog of meeting minutes were posted on 4/28/08.
112		C	Approve Joint NERC/NAESB meeting minutes from March 5, 2008 Meeting	Subcommittee, NERC ATCDT	3/5/2008	4/7/2008		Minutes were approved on 4/7/08.
113		C	Post Joint NERC/NAESB approved meeting minutes from March 5, 2008 Meeting	Subcommittee, NERC ATCDT	3/5/2008	4/7/2008		Action item is dependent on the completion of Action Item 112. Meeting minutes were posted on 4/28/08.
114		C	Approve BPS/ESS/ITS 03/10/2008 - 03/13/2008 meeting minutes	Subcommittee	3/13/2008			Minutes were approved on 4/17/08.
115		C	Post Final BPS/ESS/ITS 03/10/2008 - 03/13/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 114. Meeting minutes were posted on 4/28/08.
126		O	Talk to leadership team about working on ATC Information List	Ed Skiba	3/13/2008			Will be inlcuded in Update to EC on May 13th.

OPEN ACTION ITEMS

BPS/ESS/ITS Action Items								
Issue #	**Item Number**	**Status**	**Description**	**Assigned to**	**Dates**			**Notes**
		O = Open					Meeting	
	(Request Number or	C = Closed					When will	
	Annual Plan Number)	H = On Hold			Assigned	Due	be Addressed	
135		C	Post Final BPS/ESS/ITS 03/28/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 134. Meeting minutes were posted on 4/28/08.
137		C	Post Final BPS/ESS/ITS 03/31/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 136. Meeting minutes were posted on 4/28/08.
140		O	Approve Joint NERC/NAESB 4/7/2008 meeting minutes	Subcommittee				
141		O	Post Final Joint NERC/NAESB 4/7/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 140.
142		O	Approve BPS/ESS/ITS 04/07/2008 meeting minutes	Subcommittee				
143		O	Post Final BPS/ESS/ITS 04/07/2008 meeting minutes	NAESB Staff				Action item is dependent on the completion of Action Item 142.
145		O	Review NERC MODs once finalized to confirm that ATC postings at a minimum are consistent with the NERC recalculations.	Co-Chairs NAESB Staff	4/16/2008			Documents need to be reviewed after the NERC Mods have been finalized.
151		O	Approve Joint BPS/ESS/ITS 4/16-17/2008 meeting minutes	Subcommittee	4/17/2008			
152		O	Post Final Joint Joint BPS/ESS/ITS 4/16-17/2008 meeting minutes	NAESB Staff	4/17/2008			Action item is dependent on the completion of Action Item 151.
153		C	Develop and Post Agenda for May 1st NERC/NAESB Meeting	Co-Chairs NAESB Staff	4/17/2008	4/25/2008		Agenda was posted on 4/28/08
154		C	Develop and Post Agenda for May 1st BPS/ESS/ITS Meeting	Co-Chairs NAESB Staff	4/17/2008	4/25/2008		Agenda was posted on 4/25/08
155		C	Create CBM Parking Lot to include issues/concerns raised by NERC	Ed Skiba	5/1/2008	5/2/2008		CBM Parking Lot was submitted to NAESB for posting
156		C	Create no action required recommendation for WEQ Annual Plan Item 2.b.vi	Co-Chairs NAESB Staff	5/1/2008	5/5/2008		Recommendation has been posted for the 30-pday formal comment period.

OPEN ACTION ITEMS

BPS/ESS/ITS Action Items								
Issue #	**Item Number**	**Status**	**Description**	**Assigned to**	**Dates**			**Notes**
		O = Open					Meeting	
	(Request Number or	C = Closed					When will	
	Annual Plan Number)	H = On Hold			Assigned	Due	be Addressed	
157		C	Verify with Andy Rodriquez that NERC has completed it review of the ATC Information List.	Ed Skiba	5/1/2008	5/2/2008		5/2 - Confirmed with Andy that NERC was not planning on doing any additional reviews. However, if the Joint ESS/ITS and BPS has questions on the NERC response they can send questions to Andy to follow-up.
158		O	Update ATC Information List to reflect current MOD standards (data and requirements cross reference)	Barry Green	5/1/2008	5/9/2008	5/14/2008	
159		O	Develop and Post Agenda for May 14-16 ESS/ITS & BPS Meeting	Co-Chairs NAESB Staff	5/1/2008	5/7/2008		Agenda was sent to NAESB on May 5th.
160		O	Create draft presentation for EC Meeting and distribute to group	Ed Skiba	5/1/2008	5/6/2008		
161		O	Follow-up with Rae McQuade on options available for making ATC Information List Available without including it in the Business Practices Book as a Standard.	Jonathan Booe	5/1/2008	5/14/2008	5/14/2008	
162			Next number to be assigned					

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NAESB DSM-EE ACTIVITY SUMMARY
MARCH 29, 2008

DSM-EE PROJECT – ASSIGNED TO RETAIL GAS, RETAIL ELECTRIC AND WHOLESALE ELECTRIC:

- **April 11, 2007:** Several representatives of the NAESB WEQ, REQ, and RGQ as well as representatives of the US Department of Energy, US Environmental Protection Agency, FERC, and other industry experts met at the Department of Energy offices in Washington, D.C. to discuss the NAESB effort to draft business practices for Demand Side Management and Energy Efficiency. Ongoing Energy Efficiency and DSM projects and programs by other groups (such as NAPEE) were reviewed by the meeting attendees. The following resolution outlines the scope of the initial effort by NAESB to draft business practice standards for these topics: It was decided that NAESB should begin its standards development focus on measurement and verification of energy savings and peak demand reduction from both a wholesale and retail electric market perspective. A future schedule of meetings for DSM and Energy Efficiency should be posted on the NAESB website shortly.
- **May 24, 2007:** 75 NAESB members, FERC, DOE, EEI, ISO and State regulatory personnel, experts in DSM and energy markets participants (22% more than the first meeting) met in person and by conference telephone at NAESB headquarters in Houston to refine the scope of Phase 1 activities, agreeing on a specific list of tasks and assigning subgroups of volunteers to work on each task. At this meeting, no less than 28 individuals spoke to the group.
- **June 18, 2007:**. 51 NAESB members, FERC, DOE, EEI, ISO and State regulatory personnel, experts in DSM and energy markets participants met in person and by conference telephone at BGE offices in Baltimore to further refine the scope of Phase 1 activities by reviewing the initial task list and revising it with more detailed deliverable requirements and dates, and with identification of base documents to support completing each task.
- **July 26, 2007:** 46 NAESB members, FERC, DOE, EEI, ISO and State regulatory personnel, experts in DSM and energy markets participants met in person and by conference telephone at AGA offices in Washington DC to present deliverables of existing demand response measurement and verification protocols and a list of 41 possible topics and subtopics for NAESB model business practices. The task force reviewed all 41 possibilities, deciding whether to draft MBPs and which ones can be grouped together.
- **September 14, 2007:** The results of the meeting including possible standards text were sent out for comment including notes, considerations and possible standards text. Comments were requested on each of the nine standards development areas including whether the remarks were directed to wholesale or retail markets, pre program evaluation or post implementation evaluation, or to DSM or EE projects.
- **September 25, 2007:** A DSM-EE meeting was held in Austin, Texas hosted by ERCOT. The purpose of the meeting was to review the comments, determine the level of progress made towards the task list and determine is adjustments to the task, focus or schedule were needed. When reviewing the comments it was determined to focus in five areas specific to demand response programs, and develop business practice standards that would prove helpful – (1) DR programs administered by ISOs and RTOS in the wholesale markets, (2) DR programs administered by utilities in wholesale markets, (3) DR programs administered by utilities in the retail markets, (4) a glossary to support the DR programs, and (5) a preamble to put the business practice standards in context. To focus on the DR programs, each of the three areas outlined will develop a matrix that describes the aspects of the DR programs in effect today, planned, or has been in effect in the past.
- **November 6, 2007:** Several of the NAESB leadership met with Commissioners Kerr and Ervin of NC to gain further understanding of expectations for DSM-EE NAESB activity for electricity for the retail markets.
- **November 11, 2007**: NAESB participated in a panel on DSM-EE at the NARUC Annual Meeting in Anaheim.
- **November 30, 2007:** Meeting hosted by Dominion in Richmond. During the meeting, each of the five groups described the progress made and plans to date. Drafts of the three matrices were reviewed, as was a draft glossary

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NAESB DSM-EE ACTIVITY SUMMARY
MARCH 29, 2008

and outline for the preamble. It is possible that the two wholesale matrices will be combined, as The calendar for 2008 was also set. The next meeting is scheduled for January 23 in Baltimore hosted by BGE.

- **December 3, 2007:** A meeting was held with Commissioner Mason of Ohio to gain further understanding of expectations for DSM-EE NAESB activity for natural gas for the retail markets.
- **January 23, 2008:** The group met in Baltimore to review progress on the two matrices, the preamble and the glossary. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. Data is being placed in five separate categories -Initial Testing and Auditing, Ongoing Testing and Auditing, Triggering; Construction, Statistical Analysis, Performance and Baselines. The matrix for retail DR programs is lagging but several companies have provided or agreed to provide data – including BGE, Dominion, ConEd, Alabama Power and ComVerge. Procedures for how to collect the data was discussed with both interviews online and distributed surveys discussed. Both the preamble and glossary while first drafts are available are dependent on the work of the matrices and cannot be further developed until after more progress has been made on the matrices.
- **March 28, 2008:** The group met in Houston to review progress on the two matrices. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. The matrix had expanded significantly to provide for more comparability for responses. 45 DR programs have been identified and the data is now being verified. A template for the type of standards to be expected from this effort was reviewed. The retail matrix now has additional data and several interviews were conducted online, with the conclusion that it is the preferred way to gather data. The retail group is to set up a face-to-face meeting in May to review the matrix and make changes before sending it out to utilities for interviews.
- **Planned, May 30, 2008** – Planned meeting hosted by ISO-NE in Holyoke
- **Planned, July 30, 2008** – Planned meeting hosted by NAESB office in Houston
- **Planned, September 30, 2008** – Planned meeting hosted by ERCOT in Austin
- **Planned, December 2, 2008** – Planned meeting hosted by NAESB office in Houston

THE FOLLOWING INCLUDES:

- DSM-EE DISTRIBUTION LIST PAGE 3
- RETAIL MATRIX AND WORK PLAN 11
- WHOLESALE WORK PLAN AND MATRIX 26

LINKS ON THE NAESB WEB SITE:

- DSM-EE NAESB PAGE FOR MEETINGS AND MATERIALS: http://www.naesb.org/dsm-ee.asp
- RELEVANT DOCUMENTS AND WORK PAPERS: http://www.naesb.org/dsm-ee_doc.asp

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Steve Krein, Electric Reliability Council of Texas
Faith S. Lambert, Office of Weatherization and Intergovernmental Program, EE-2K
Rob Lamoureux, Midwest ISO
Pete Langben, PJM Interconnection, LLC
David LaPlante, ISO New England Inc.
Mark Lauby, North American Electric Reliability Corporation
Melissa Lauderdale, Edison Electric Institute
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Kyle Leach, Southern Company

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Retail Matrix Work Plan for NAESB EE/DSM Standards

Task/Description/Steps	Status
1 FINALIZE THE RETAIL MATRIX SPREADSHEET	
The retail matrix spreadsheet will provide the basis for a utility survey to determine what types of M&V are currently underway for current or past DR programs and what is planned for new programs.	
• Decide if spreadsheet needs to be reformatted. *Assigned to Rae McQuade, presented at the January DSM-EE meeting.*	Completed – 1-17-08
• Add additional columns – past programs, current programs, proposed programs *Assigned to Rae McQuade, presented at the January DSM-EE meeting.*	Completed – 1-17-08
• Add examples from BGE and Alabama Power *Examples provided by BGE (Ruth Kiselewich) and Alabama Power (Neal Allen).*	Completed – 1-17-08
• Add examples from ConEd and Puget Sound Energy *Examples were provided by Puget Sound Energy (Bob Harshbarger) but a follow up call is needed to ensure correct entry to the matrix. ConEd has been contacted. Rip Newcomb and Rae McQuade to contact ConEd and PSE, complete via conference call, and web cast.*	Completed – 3-18-08, ConEd review of matrix entries is not complete.
• Determine if other examples should be added. *Add additional examples from Dominion and reach out to ComVerge. Alabama Power review of its entries in light of the others added. ComVerge has been contacted and may provide data.*	March 31, 2008
• Review the examples to determine if matrix should be revised to provide the analysis needed in later steps. Review for lessons learned with the ISO-RTO Council in its matrix development and reflect such modifications in the retail matrix. Modify instructions based on interviews.	After March 28, 2008
2 PREPARE SURVEY	
The survey will be used to solicit other utility responses for DR programs that they have administered, currently administer or plan to administer. The data will be entered into the retail matrix spreadsheet.	
• Provide cover letter draft for review.	Outline prepared for review pre-March 28.
• Describe the purpose of survey, what is expected and how to respond. Prepare a white paper as part of the cover letter that would outline expectations.	Outline prepared for review pre-March 28.
• The cover letter introducing the survey should allow for two methods of data collection: (1) Phone survey with matrix filled in during conference call/web cast wit the submitter including work papers forwarded prior to the call, or (2)	

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Retail Matrix Work Plan for NAESB EE/DSM Standards

Task/Description/Steps	Status
submitter providing responses directly into the matrix, which may then require a follow up call should additional information be required for the responses.	
• Consider preparation of tutorial (access instructions work sheet from the retail matrix and elaborate to prepare a tutorial) – this may not be required if the instructions are sufficient and we address data collection primarily via the web cast interview process.	Set up a task force call for this after calls with PSE and ConEd. and cover letter has been drafted
3 CONDUCT SURVEY	
The survey instrument will request each participant to submit his or her responses. Responses will be reviewed and segregated into types of programs. A summary report will be produced which describe the quality of the responses and the general types of programs that were submitted. This will be a qualitative assessment to determine the next steps of evaluation and the level of effort required.	
• Identify target audience of utilities.	
• Forward survey and contact utility to determine method of completion of survey for matrix entry.	
• Assemble responses in matrix and review for consistency.	
• Identify follow up contacts as a result of review.	
4 COLLECT AND SUMMARIZE SURVEY RESULTS	
• Identify similarities within programs, related to M&V that may support development of business practices.	
• Identify regional aspects that should be preserved.	
• Determine if business practices have target area for applicability.	
5 REPORT TO NAESB	
Report out on preliminary assessment of the responses with a proposed work plan to complete the analysis and recommend next steps.	
• Draft report	

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Retail Matrix Work Plan for NAESB EE/DSM Standards

Task/Description/Steps	Status

- Review draft report with contributors and edit as needed
- Prepare presentation of results for DSM-EE subcommittee

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RETAIL MATRIX

How to use this Matrix:

To the best of your ability fill in the matrix with tje descriptions for the columns as noted below. If there are multiple programs or product names or triggers within a Class of DR Resource, please include their names and the trigger actions as appropriate . If there are different M&V requirements within a Class of DR Resource include them separated by a notation as to which product name it applies. There is no limit to the amount of information you add for each box, (this should occur rarely). Please note that the description text provided for specific programs is used as examples to put the issue identified in the heading within context. Companies may have different or similar descriptions for programs. There may or may not have differences in program qualification versus program implementation.

This Section in below in Blue is meant to clarify and focus the M&V content to be filled in the matrix following

Column Header	Objective	Frequency	Description
Qualification/ testing/ auditing	To ensure that the DR resources are capable of performing, thereby delivering the product(s) being purchased.	Prior to participation in market, and ongoing.	Up front process to verify adequate infrastructure (measurement & data recording and communication equipment and data validation procedures) in place. May include on-site inspections, data transfers, actual load reduction test to verify that the resource is able to deliver the committed reductions. Process & procedures for disqualification. THe data entered should answer the question: "How do you verify that the equipment is operating as expected?"
Data reporting- frequency and monitoring	To ensure adequate information to measure DR performance, accurate settlement and real-time operating data as appropriate.	Ongoing and/or event-driven.	Requirements around transmittal of meter and/or telemetry data to market. Includes validation, editing & estimation (VEE). *If reporting for a particular product is differentiated by what it is used for, e.g. operations, planning or settlement only. For VEE - addressing missing values, high-low checks, etc.*.Utility best practices should be followed in addressing missing data or questionable data with techniques used to estimate or edit data. Retail business practices may be developed to define parameters supporting addressing estimates or editing to replace missing or questionable data.

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Column Header	Objective	Frequency	Description
Meter and equipment standards	To ensure appropriate granularity (frequency of data collection), frequency of data communication, accuracy and validity of data.	Ongoing or event-driven.	Requirements for meter accuracy, calibration, precision & testing *and frequency of above.* This could include support of ANSI standards for the performance of the meter equipment or control devices for the equipment. There is a difference between the sample population and the normal target population and is dependent on the investment made by the utility.
Performance/ baseline	To ensure the methodologies and techniques used to calculate load response and/or recovery produce results that are within the required error tolerances (i.e., +/- X%).	Ongoing or event-driven.	Method(s) and techniques used to calculate the DR resource's expected load absent the DR instruction or request. Load response is the difference between its actual metered load and the calculated baseline. Baselines may vary depending on age of equipment and other criteria. The following questions may be answerd in the responses for performance/baseline: *How is the baseline calculated? How is an acceptable default reached for a utility operating in a non-ISO footprint?* In comparison to the wholeasle market, ISOs establish baselines and compare to usage immediately prior to an event.
Statistical sampling of non-interval metered loads	To ensure that the methodologies and techniques used to calculate load response and/or recovery create a statistically valid use alternative to interval metering for measuring DR performance or aggregations of loads, produce results that are statistically valid.	Ongoing or event-driven.	Methodology for creating a statistically valid alternative to universal interval metering, to include precision & accuracy requirements, sample size and selection requirements and bias control.
Deployment Limitations	Define any maximum number of events or hours of program deployment. *Limitations of the number of times the event is called, the length of an event, the % of participants*	N/A	Restrictions of program operation and /or participation. Limitations of the number of times the event is called, the length of an event, the % of participants

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Column Header	Objective	Frequency	Description
Regulatory and market context	*This would be helpful to identify the different regulatory contexts under which programs operate.*	N/A	Context under which the service or program is being offered.

Class of DR Resources	Notes:
Submitter	These columns were added to indicate the submitters and the status of the programs described
Status	These columns were added to indicate the submitters and the status of the programs described
Product Type	
Category	Ancillary Services, Capacity, Energy Voluntary, Energy Price
Program or Product Name	Need to compile a list of programs. Each ISO/RTO calls their products and programs different things. In order to track and define similarities and then translate that back to each ISO/RTO this field should include the program or product name
When is Product expected to perform - Trigger events	Questionable on whether this is needed for development of M&V model business practices for the retail market - this column is needed for the ISO/RTO matrix. This trigger event will probably vary from company to company. Triggers require date and time stamps. Each ISO/RTO program or product has unique trigger events their products and programs different things. In order to track and define similarities and then translate that back to each ISO/RTO this field should include the trigger action for the program or product.

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RETAIL MATRIX

NAESB Retail Matrix as of March 28, 2008

Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limiations	Regulatory and market context
Capacity	Submitter	Dominion, Ripley Newcomb, 804-771-4637, ripley.newcomb@dom.com		Verification: Operate a pilot program to determine that at least 95% of devices both receive and respond to signal to turn off WH at the beginning of the program. Depending on the manufacturers and device, the verification may come from a signal back from device, a data logger, or an IDR on the meter. Ongoing, a sample of at least 250 devices should be tested at least every 5 years to determine the overall failure rate and to develop a net to gross ratio. This ratio will be applied to the deemed kW per customer reduction from the load study.	Data from IDR will be collected on monthly meter reading route for pilot and sample accounts. When program is implemented, the profiled reduction from the sample will be deemed to be the reduction for the program population. Monthly data will be required for PJM settlement	The customer's meter will continue to be used for billing determinants. The WH control switches should be included in the periodic meter tests to verify that 95% of the devices remain operational. The communication signal must be tested annually. Accounts in the load profile sample should have an end-use recorder on the water heater as well as a whole house recorder. Thirty minute interval data is adequate, although fifteen minute data on the water heater is considered preferable.	The algorithm that provides a reasonable estimate of normal customer usage absent any water heater interruption will be utility (and program specific). The CBL formula that is approved by the utility's ISO should be an acceptable default alternative.	An initial sample of 250 homes will provide a reasonably accurate estimate of load reduction that should be within =/- 5% of the true mean at a 90% confidence interval. The estimate for each demand reduction should be calculated with a 90% confidence level and the accuracy determined for each load reduction. An average error bound within +/- 10% will be considered to be accurate. If the net to gross operability study has remained at or above 90%, a sample of 100 homes will be adequate and should produce an error bound within =/- 5%. If net to gross operability drops below 90%, then a full sample of 250 homes will be required. If a tighter error bound is necessary, a larger sample will be required. (NOTE: This recommendation based on "PJM Deemed Savings for Legacy AC/WH Programs" report.)		
	Status	Program not in effect today								
	Product type									
	Category									
	Program or Product Name	Residential Water Heater Control Program								
	Trigger Events	when system load is critical (defined as ____) or when zone load is priced at or above $____ or transmission constraints in zone (defined as _____)								

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NAESB Retail Matrix as of March 28, 2008										
Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limiations	Regulatory and market context
Energy Price	Submitter	Dominion, Ripley Newcomb, 804-771-4637, ripley.newcomb@dom.com		Each customer site will provide a dedicated IBM compatible PC with a modem in order to receive the price transmissions and the telecommunication equipment needed for the company to communicate with the meter (dedicated phone line, cellular phone modem, etc.) The company will provide the software to allow receipt of the RTP prices as well as to perform analytical and graphical functions. The company will install an IDR . A rate contract will be executed to insure that the customer fully understands the rate and agrees to a one year minimum commitment. (NOTE: the existing RTP rate is currently closed to new customers.)	The company will maintain access through the provided phone line and will collected half-hourly load data every 24 hours.	Standard billing meter and IDR, meeting company standards for accuracy. Modem and phone line provided by customer.	See Dominion VA Power rate sch.. RTP, paragraph V. DETERMINATION OF BASELINE KW LEVELS, BASELINE ENERGY LEVELS, AND INCREMENTAL ENERGY USAGE.	Not sampled.		
	Status	Program not in effect today								
	Product type									
	Category									
	Program or Product Name	Real Time Pricing rate (RTP)								
	Trigger Events	when system load is critical (defined as ____) or when zone load is priced at or above $____ or transmission constraints in zone (defined as _____)								

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Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limiations	Regulatory and market context
Capacity	Submitter	Puget Sound Energy, Shannon McCormick, 425-256-2399, shannon.mccormick@pse.com		The pilot program is administered by EnerNOC for PSE. Participants are provided a no-cost site assessment of potential curtailable loads. Site enablement requires of demand pulse interval meter data and appropriate LAN connections. Five-minute interval meter data is continuously passed via an Internet LAN connection to the EnerNOC's network operations center in Boston, MA. The data is collected during the event, which can span from one to four hours. The participants are estimated to on average curtail 100 - 200 kW in the winter season (November - February) and 100 - 200 kW in the summer (May - September).	The pilot seeks to provide PSE to practical knowledge and performance data for customer facilities during winter and summer control events. Continuous, near real-time interval meter data supports measurement of capacity performance, baseline readings and development of the load adjustment. When the event is called, the participants are notified one hour ahead - for winter season notification windows (6 am to 9 am and 5 pm to 9 pm) and the summer	Demand pulse interval meters are installed at the participants sites as well as a pulse splitter to permit EnerNOC to receive the meter data.	Performance is calculated based on a baseline determined from the highest thee days out of the previous ten business days for a given participant.	Not applicable	The participants represent a mix of facility/operation/load types, of which a maximum of 24 participants can be accommodated in the program. The program is operational from November 2007 to December 2009. The financial incentives offered for participants in measured capacity curtailment is capped at $5000 per participant per season, (provided through $20/kW seasonal average curtailment).	The program is operational in King County, Washington, and falls under the jurisdiction of Washington Utilities and Transportation Commission. The rate schedule is Electric Schedule 249A.
	Status	Pilot program in effect today and began November 2007. The program will end in December 2009.								
	Product type	Direct Load Control								
	Category	Capacity								
	Program or Product Name	Commercial-Industrial Load control Pilot Program								

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NAESB Retail Matrix as of March 28, 2008											
Specifics of the DR Program Being Described				M&V Aspects of the DR Programs							
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limiations	Regulatory and market context	
	Trigger Events	The program is triggered by weather conditions determined by PSE resource planners.			notification window (2 pm to 6 pm). Following each event, EnerNOC reports to PSE the five minute interval kW data files (for each site) covering the (10 business day) baseline calculation period, through to the end of the event day. PSE separately maintains its own 15 minute utility meter data files for evaluation purposes.						
Price and Capacity Program	Submitter	ConEd, Elena Futoryan, 212-460-2228, futoryane@coned.com		This is not a pilot. A revenue grade interval meter with phone lines is required. For customers -- 50 KW reduction, and for load aggregators -- 100 KW reduction, for 4 consecutive hours. Audit is required for the mandatory program. The maximum commitments are pending approval. In 2007, the maximum was 6 hours per capability period. May 1 to October 31 is the summer capability period for the mandatory program. There is	The customers are billed on the data and it is collected daily. The meters are 15 minute interval meters. The data is 15-minute interval data, and the baseload level should be met every hour - so the data is rolled up to hourly. The data is collected after an event is called, at least within a week. The data is stored in	Revenue grade interval meters must be used with appropriate telephone lines. Precision levels should be available.	Performance is calculated based on NYISO methodology for capacity and energy payments.	not applicable	Under review - tariff pending approval	NY PSC	
	Status	In effect today									
	Product type										
	Category										
	Program or Product Name	Reservation Payment Program									

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NAESB Retail Matrix as of March 28, 2008

Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limiations	Regulatory and market context
	Trigger Events	The program is triggered in heavy demand conditions as provided by the tariff. The trigger levels are under consideration now and may be changed.		no winter capability option for the mandatory program at this time.	a time stamp meter.					
Capacity	Submitter	Alabama Power, Neal Allen, 205-257-6579, hnallen@southernco.com		Two way communication devices. We send test and customers respond. Test periodically.. In addition, "in field" tests are performed periodically as well.	Interval metered data captured and maintained. Actual load evaluated when IS call occurs. Normal load levels evaluated when no call occurs. This allows for a determination of expected results when called. Program requirements are that customer drop to firm level during a call. No "reduction" constraints utilized.	Utilizes revenue quality meters.	The IS customer is required to cut load to the contracted firm load level. Actual load dropped is determined by evaluating pre and post event load levels of each customer.	N/A	Customer has options to choose various call constraints. Chosen option determines the credit amount to the customer for non-firm load.	PSC regulated tariff
	Status	In effect Today								
	Product type	Interruptible Load								
	Category	Capacity								
	Program or Product Name	Industrial Interruptible Program, IS Program								
	Trigger Events	During a System Reliability Alert "System Alarm" notice. Can be utilized for locational reliability issues if necessary.								

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RETAIL MATRIX

NAESB Retail Matrix as of March 28, 2008

Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limiations	Regulatory and market context
Capacity	Submitter	Alabama Power, Neal Allen, 205-257-6579, hnallen@southernco.com		Two way communication devices. We send test and customers respond. Test periodically.. In addition, "in field" tests are performed periodically as well. Generators are remotely started monthly for reliability purposes.	Two way communication confirms operating equipment.	Utilizes revenue quality meters.	No baseline requirements. Equipment rating and reliability testing determines expected reduction for a call.	N/A	Program rules set minimum 250 kW size to participate in the program. Program call constrained to 8 hours per day, 5 days per week, 240 hours per year.	PSC regulated tariff
	Status	In effect Today								
	Product type	Utilization of customer owned generation								
	Category	Capacity								
	Program or Product Name	Stand By Generator Program								
	Trigger Events	During a System Reliability Alert "System Alarm" notice. Can be utilized for locational reliability issues if necessary.								
Energy	Submitter	Alabama Power, Neal Allen, 205-257-6579, hnallen@southernco.com		Originally offered years ago prior to any qualification or auditing requirements. None exist today.	TOU metered data captured and maintained. No change or reduction constraints exist.	Utilizes revenue quality meters.	No performance levels expected therefore no baseline required.	N/A	Various TOU rates are available to customers meeting specific SIC codes. Some require separate metering for specific end uses such as irrigation pumps, electric	PSC regulated tariff
	Status	In effect Today								
	Product type	TOU Rates								
	Category	Energy price								

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RETAIL MATRIX

NAESB Retail Matrix as of March 28, 2008										
Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limiations	Regulatory and market context
	Program or Product Name	TOU Rates							vehicle charging, etc.	
	Trigger Events	Various types of TOU rates exist for various types of residential, commercial, and industrial customers. Rates vary by fixed customer charge, season, and time of day. Majority of rates are based on summer and non-summer seasons with peak, intermediate, and off-peak rate periods.								
Capacity	Submitter	BGE, Ruth Kiselewich, 410-470-1361, ruth.c.kiselewich @bge.com		BGE tests a sample of switches periodically. Switch operability studies must be conducted every 5 years, according to PJM, Manual 19: Load Data Systems.	In addition to the periodic sampling of switch operability, BGE conducts Load Research Studies to estimate the average impact for each participant in the	For its Load Research Studies, BGE uses ANSI certified meters that have been approved by the PSC for load recording.	For the development of average impacts for water heating, BGE compares non-event days to event days using a comparison of means. The	Load data are obtained from meters that were installed on 65 customers' water heaters. This stratified sample design provides a confidence of 90% ± 10% accuracy.		
	Status	In effect Today								

RETAIL MATRIX

NAESB Retail Matrix as of March 28, 2008

Specifics of the DR Program Being Described				M&V Aspects of the DR Programs						
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limitations	Regulatory and market context
	Product type				program.		difference between these two (2) load shapes forms the average impacts. PJM requires average impacts for each hour between noon and 8 p.m. The non-event profile is comprised of the hottest days of the summer.			
	Category									
	Program or Product Name	BGE's Residential Water Heater Control Program (Rider 6)								
	Trigger Events	BGE can activate switches up to 15 times per year for reliability or economic reasons.								
Capacity	Submitter	BGE, Ruth Kiselewich, 410-470-1361, ruth.c.kiselewich @bge.com		BGE tests a sample of switches periodically. Switch operability studies must be conducted every 5 years, according to PJM, Manual 19: Load Data Systems.	In addition to the periodic sampling of switch operability, BGE conducts Load Research Studies to estimate the average impact for each participant in the program.	For its Load Research Studies, BGE uses ANSI certified meters that have been approved by the PSC for load recording.	For the development of average impacts for air conditioning, BGE compares non-event days to event days using regression analysis. The model estimates the average impact provided a particular weather	Load data are obtained from meters that were installed on 100 customers' air conditioner units. This stratified sample design provides a confidence of 90% ± 10% accuracy.		
	Status	In effect Today								
	Product type									
	Category									

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RETAIL MATRIX

NAESB Retail Matrix as of March 28, 2008											
Specifics of the DR Program Being Described				M&V Aspects of the DR Programs							
Class of DR Resources				Qualification/ testing/ auditing	Data reporting-frequency and monitoring	Meter and equipment standards	Performance/ baseline	Statistical sampling of non-interval metered loads	Deployment Limiations	Regulatory and market context	
	Program or Product Name	BGE's Residential Air Conditioner Control Program (Rider 5)					conditions. PJM requires average impacts for each hour between noon and 8 p.m.				
	Trigger Events	There is no limit to the number of times BGE can activate switches for reliability or ecomic reasons.									

To the extent that NAESB can provide some protocols that would assist groups such as ISOs in evaluating the effectiveness of programs would be helpful.

Time of Use
Examples:
Schedule of prices published such the consumer can determine his energy consumption based in part on price signals published.

Real Time Pricing

Demand Charges

Peak Time Rebates

Planning Peak Alerts

Interruptible/Curtailable Management Rates

Thermal Storage/Energy Storage

Standby Generation Rates (emergency generators and distributed generators)

Smart Appliances

Ancillary Programs

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WHOLESALE PLAN

ISO/RTO Wholesale Matrix Plan					
#	**Task**	**Description**	**Deliverable**	**Completion Date**	**Who**
1	Finalize Framework	The draft framework will serve as a basis for documenting the technical M&V requirements for the different ISO/RTO products. It should guide each ISO-RTO in answering the questions of Why, When, and What M&V is done.	Each ISO should provide comments on the Objectives, Frequency and Description. Each ISO/RTO should add any additional comments that it feels it needs to describe the products, (this will help to synthesize any commonalities between products and ISO/RTOs). If the list of product classes are not representative, please comment.	10/30/07 COMPLETE	All
2	ISO/RTO Conference Call	This call is designed to discuss comments submitted in regard to the Framework	Come to consensus on the Framework	Week of November 19 , 2007 COMPLETE	All
3	Report to NAESB DSM/EE Standards Committee	At the September 25th meeting the ISO/RTOs tacitly agreed to report back to the Committee on how we plan on completing the task by the end of the 1st quarter of 2008.	Report to NAESB DSM-EE Task Force the status of the ISO/RTO Wholesale standards development.	11/30/07 COMPLETE	P. Wattles, E. Winkler
4	Add M&V technical data	Each ISO/RTO will fill in the matrix with appropriate technical requirements and how the M&V activity is implemented (where appropriate) for each of its products and each M&V area.	A Draft Matrix with the general description of the M&V areas, products and technical information in M&V requirements for each ISO/RTOs range of products.	12/15/07 COMPLETE	All
5	ISO/RTO Conference Call	This call is designed to review progress on data synthesis from the Framework	Develop status update on development of wholesale standards	January 14, 2008. COMPLETE	All
6	Report to NAESB DSM/EE Task Force	Status report of Wholesale standards	Report to NAESB the status of the ISO/RTO Wholesale standards development.	1/23/2008 COMPLETE	P. Wattles, E. Winkler
7	Update M&V Technical Data	ISO/RTOs will update matrices with appropriate expanded technical requirements.	Expanded draft Matrix	1/30/2008 COMPLETE	All
8	ISO/RTO Conference Call	This call is designed to review progress on data synthesis from the Framework	Develop status update on development of wholesale standards	2/11/08 COMPLETE	All
9	Draft Wholesale Standards	Synthesize Technical Requirements into draft Standards	Draft Standards will be developed by processing the technical requirements provided by all the ISO/RTOs to find commonalities and or create ranges of requirements	2/29/08 COMPLETE internal document	E. Winkler lead, Scott COE, review by All

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WHOLESALE PLAN

ISO/RTO Wholesale Matrix Plan					
#	**Task**	**Description**	**Deliverable**	**Completion Date**	**Who**
10	ISO/RTO Working Meeting	This meeting is designed to review and discuss the draft wholesale standards.	Provide agreement on draft standards to be submitted to NAESB	3/11/08 - 3/12/08 COMPLETE	All
11	Revise Draft Outline of Standards	Revised Draft Wholesale DR Standards outline based on working group session distributed to ISO/RTO working group	Revised Draft Wholesale Standards Outline	3/18/08 COMPLETE	E. Winkler
12	Update M&V Technical Data	Each ISO/RTO will revise entries in the matrix for appropriate technical requirements per the current draft matrix. (IRC Demand Programs 2008-03-14.xls)	A Draft Matrix with the general description of the M&V areas, products and technical information in M&V requirements for each ISO/RTOs range of products and services	3/21/08	All
13	Call to review Presentation & discuss presentation at DSM/EE Meeting	Review of materials and scope of presentation at NAESB DSM/EE standards development meeting, Houston, TX March 28, 2008	Presentation materials for meeting	3/26/08	P. Wattles, E. Winkler
14	NAESB DSM/EE Standards Committee	ISO-RTO documents presented as a draft for wider NAESB stakeholder consideration and comment	Report to NAESB on documented ISO/RTO Wholesale DR M&V standards for use in developing proposed NAESB standards and/or model business practices.	3/28/08 Houston TX	P. Wattles, E. Winkler, S. Coe
15	ISO/RTO Working Meeting	This meeting is designed to review and discuss the draft wholesale standards.	Provide agreement on draft standards to be submitted to NAESB	Mid May, 2008, TBD	All
16	NAESB DSM/EE Standards Committee	ISO-RTO documents presented as a draft for wider NAESB stakeholder consideration and comment	Report to NAESB on documented ISO/RTO Wholesale DR M&V standards for use in developing proposed NAESB standards and/or model business practices.	5/30/08 Holyoke, MA	P. Wattles, E. Winkler, S. Coe
17	NAESB DSM/EE Standards Committee	ISO-RTO documents presented as a draft for wider NAESB stakeholder consideration and comment	Report to NAESB on documented ISO/RTO Wholesale DR M&V standards for use in developing proposed NAESB standards and/or model business practices.	7/30/08 TBD	P. Wattles, E. Winkler, S. Coe
18	ISO/RTO Working Meeting	This meeting is designed to review and discuss the draft wholesale standards.	Provide agreement on draft standards to be submitted to NAESB	Mid Sept, 2008, TBD	All

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WHOLESALE PLAN

ISO/RTO Wholesale Matrix Plan					
#	**Task**	**Description**	**Deliverable**	**Completion Date**	**Who**
19	Draft Wholesale DR Standards	Final Draft Wholesale Standards Completed for submittal to NAESB	Completed draft ISO/RTO contribution of wholesale DR M&V standards	9/30/08	E. Winkler, S. Coe
20	NAESB DSM/EE Standards Committee	ISO-RTO documents presented as a draft for wider NAESB stakeholder consideration and comment	Report to NAESB on documented ISO/RTO Wholesale DR M&V standards for use in developing proposed NAESB standards and/or model business practices.	9/30/08 Austin, TX	P. Wattles, E. Winkler, S. Coe

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WHOLESALE MATRIX

Instructions for Characteristics of DR Programs

ISO/RTO Specific Name	**Region**	Abbreviation for the ISO/RTO.
	ISO/RTO Program or Service Name	Proper name for the program or service within the region. Note: If several products are included in a given Program or Service, then several rows will be shown for each.
	Acronym	Acronym for the Program or Service
Major Features	**Product**	The commodity that is being offered: **AS: Regulation**, **AS: Spin**, **AS: Non-Spin**, **Energy**, or **Capacity**.
	Mapping: NAESB Sections	**CALCULATED FIELD: DO NOT TYPE IN THIS CELL**
Initial Qualification / Testing / Auditing	**Load Deployment Time**	Time at which the requested level of response is completely "off the system" (in minutes)
	Aggregation Allowed	Indication of if composite / aggregated assets are allowed.
Telemetry	**Real-Time On-Site Generation Measurement**	If on-site generation is present; is metering required? **Yes** / **No**
	Accuracy	Precision of the Demand Measurement (or also of the On-Site Generator Output) ***PREFERENCE IS PERCENTAGE OF FULL SCALE***
	Reporting Interval	The time between signals [in seconds]
	Other Measurements	If other variables are measured, a list should be provided here. Example include quality flags, breaker status, response amount, etc .
	Communication Protocol	The IT protocol used to collect the data, such **ICCP** or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.
After-The-Fact Measurements	**On-Site Generation Meter Required**	Yes or No
	Meter Accuracy	Accuracy of the Meter Reading (or also of the On-Site ~~Generator Output) PREFERENCE IS PERCENTAGE~~ OF FULL SCALE and is the net accuracy, i.e. includes

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WHOLESALE MATRIX

Instructions for Characteristics of DR Programs

		PT & CT
	Clock / Time Accuracy	Accuracy of the time measurement (if any) associated with the Meter Read time.
	Details of Meter/Equipment Standards	Listing of any meter or equipment standards
	Meter Data Reporting Deadline	How often is the meter reading data sent to the ISO/RTO related to demand response reporting. May be absolute or relative to Event period. Also, those entries marked "Daily" or "Monthly" happens regardless of the existence of an Event.
	Granularity	The level of detail in the reported data. For example, if the Periodicity = 1 hour, the Granularity might be 5 minute.
	Validating, Editing & Estimating (VEE) Method	An indication of how missing data are managed, for example, **Skipped**, **Estimated & Flagged**, etc.
	Rules For Statistical Sampling	If statistical sampling is allowed, document the sample size, precision and accuracy parameters, homogeneity, etc.
Performance / Baseline	**Baseline Type**	Either "**Meter-Before vs. Meter-After**", "**Comparable Day**", "**Statistical Algorithm**" , "**Behind the Meter Generation Data**", "**Firm Service Level Drop**"

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
AESO	Demand Opportunity Service	DOS		UNDEFINED
AESO	Frequency Load Shed Service	FLSS	AS: Regulation	Regulation
AESO	Supplemental Operating Reserves	SUP	AS: Non-Spin	Reserve
AESO	Voluntary Load Curtailment Program	VLCP		UNDEFINED
CAISO	Participating Load Program	PLP	Energy	Energy
CAISO	Participating Load Program	PLP	AS: Non-Spin	Reserve
ERCOT	Emergency Interruptible Load Service	EILS	Capacity	Capacity

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Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
ERCOT	Loads Acting as a Resource providing Responsive Reserve Service -- Under Frequency Relay Type	LaaR / RRS / UFR	AS: Spin	Reserve
ERCOT	Loads Acting as a Resource providing Responsive Reserve Service -- Controllable Load Resource Type	LaaR / RRS / CLR	AS: Spin	Reserve
ERCOT	Loads Acting as a Resource providing Non-Spinning Reserve Service	LaaR / NSRS /	AS: Non-Spin	Reserve
ERCOT	Controllable Load Resources providing Regulation Service	CLR	AS: Regulation	Regulation
IESO	Emergency Load Reduction Program	ELRP	Energy	Energy
IESO	Emergency Demand Response Program	EDRP	Energy	Energy
IESO	Dispatchable Load	DL	Energy	Energy

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
IESO	Dispatchable Load (Spinning Component)	DL	AS: Spin	Reserve
IESO	Dispatchable Load (Non-Spinning Component)	DL	AS: Non-Spin	Reserve
IESO	Hour Ahead Dispatchable Load	HADL	Energy	Energy
ISO-NE	Real Time Demand Response Program [Capacity Component]	RTDRP	Capacity	Capacity
ISO-NE	Real Time Demand Response Program [Energy Component]	RTDRP	Energy	Energy
ISO-NE	Day Ahead Load Response Program	DALRP	Energy	Energy
ISO-NE	Demand Response Reserves Pilot	DRR	AS: Non-Spin	Reserve

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
ISO-NE	Real Time Price Response Program	RTPR	Energy	Energy
ISO-NE	Real Time Demand Response Resource	RTDR	Capacity	Capacity
ISO-NE	FCM: On-Peak, Seasonal Peak, Critical Peak Resources		Capacity	Capacity
ISO-NE	Real Time Emergency Generation Resource	RTEG	Capacity	Capacity
NBSO	30 Minute Non-Spinning Reserves	30NSR	AS: Non-Spin	Reserve
NBSO	10 Minute Non-Spinning Reserves	10NSR	AS: Non-Spin	Reserve
NBSO	10 Minute Spinning Reserve	10SR	AS: Spin	Reserve

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
NBSO	Load Following	LF	AS: Regulation	Regulation
NBSO	Regulation	REG	AS: Regulation	Regulation
NBSO	Interruptible Load	IL	Capacity	Capacity
NBSO	Bid-Based Demand Response	BBDR	Energy	Energy
NYISO	Day-Ahead Demand Response Program	DADRP	Energy	Energy
NYISO	Demand Side Ancillary Services Program	DSASP	AS: Spin	Reserve
NYISO	Demand Side Ancillary Services Program	DSASP	AS: Non-Spin	Reserve

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
NYISO	Demand Side Ancillary Services Program	DSASP	AS: Regulation	Regulation
NYISO	Emergency Demand Response Program	EDRP	Energy	Energy
NYISO	Installed Capacity Special Case Resources (Energy Component)	SCR	Energy	Energy
NYISO	Installed Capacity Special Case Resources (Capacity Compoent)	SCR	Capacity	Capacity
PJM	Economic Load Response		Energy	Energy
PJM	Economic Load Response		AS: Spin	Reserve
PJM	Economic Load Response		AS: Regulation	Regulation

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WHOLESALE MATRIX

Wholesale Matrix DR Programs Identified				
ISO/RTO Specific Name			***Major Features***	
Region	**ISO/RTO Program or Service Name**	**Acronym**	**Product**	**Mapping: NAESB Sections**
PJM	Emergency Load Response		Energy	Energy
PJM	Emergency Load Response (Energy Component)		Energy	Energy
PJM	Emergency Load Response (Capacity Component)		Capacity	Capacity

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WHOLESALE MATRIX DRAFT PROPOSED STANDARDS OUTLINE

DISCLAIMER

THIS DOCUMENT CONTAINS DRAFT INFORMATION ON STANDARDS FOR WHOLESALE ELECTRICITY DEMAND RESPONSE PROGRAMS AND SERVICES. THE INFORMATION CONTAINED WITHIN THIS DRAFT IS NOT INTENDED TO REPLACE APPLICABLE TARIFFS FOR WHOLESALE DEMAND RESPONSE. IN NO CASE DOES THIS INFORMATION SUPPLANT EXISTING STANDARDS USED IN ISO/RTO ADMINISTERED MARKETS. PROPOSED STANDARDS AREAS ARE DRAFT AND SUBJECT TO REVISION OR EXCLUSION.

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WHOLESALE MATRIX DRAFT PROPOSED STANDARDS OUTLINE

BUSINESS PRACTICES FOR WHOLESALE ELECTRICITY DEMAND RESPONSE

Introduction

Definition of Terms

Business Practice Requirements: Regulation Services

PROVISIONS OF MEASUREMENT AND VERIFICATION STANDARDS

Applicability

Purpose

WHOLESALE MARKET DEMAND RESPONSE PRODUCTS

Wholesale Products:
The commodity that is being offered: Regulation, Reserve, Energy, or Capacity.

INITIAL QUALIFICATION / TESTING / AUDITING

Reduction Deadline Standard:
Time at which the requested level of response is completely "off the system" (in minutes)

Aggregation Allowed Standard:
Indication of if composite / aggregate assets are allowed.

TELEMETRY

Real-Time Demand Measurement Required:
Measurement of the real-time demand for each Resource required: Yes / No.

Real-Time On-Site Generation Measurement:
If on-site generation is present; is metering required? Yes / No.

Accuracy:

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Precision of the Demand Measurement (or also of the On-Site Generator Output)

Reporting Interval:

The time between signals [in seconds]

Other Measurements:

If other variables are measured, a list should be provided here. Example include: quality flags, breaker status, response amount, etc.

Communication Protocol:

The IT protocol used to collect the data, such ICCP or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.

AFTER-THE-FACT MEASUREMENTS

On-Site Generation Meter Required:

Yes or No

Meter Accuracy:

Accuracy of the Meter Reading (or also of the On-Site Generator Output) and is the net accuracy, i.e. includes PT & CT

Clock / Time Accuracy:

Accuracy of the time measurement (if any) associated with the Meter Read time.

Details of Meter/Equipment Standards

Listing of any meter or equipment standards

Meter Data Reporting Deadline:

How often is the meter reading data sent to the ISO/RTO related to demand response reporting. May be absolute or relative to Event period. Also, those

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entries marked "Daily" or "Monthly" happens regardless of the existence of an Event.

Granularity:

The level of detail in the reported data. For example, if the Meter Data Reporting Deadline = “within 24 hours”, the Granularity might be “1 hour”.

Validating, Editing & Estimating (VEE) Method:

An indication of how missing data are managed, for example, Skipped, Estimated & Flagged, etc.

Rules for Statistical Sampling:

If statistical sampling is allowed, a brief summary of the rules associated with the estimates, for example, minimum percentage of physical measurements.

PERFORMANCE / BASELINE

Baseline Types:

Either "Meter-Before vs. Meter-After", "Comparable Day", "Statistical Algorithm" , "Behind the Meter Generation Data", "Firm Service Level Drop"

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WHOLESALE MATRIX DRAFT PROPOSED STANDARDS OUTLINE

Business Practice Requirements: Reserves Services

PROVISIONS OF MEASUREMENT AND VERIFICATION STANDARDS

Applicability

Purpose

WHOLESALE MARKET DEMAND RESPONSE PRODUCTS

Wholesale Products:
The commodity that is being offered: Regulation, Reserve, Energy, or Capacity.

INITIAL QUALIFICATION / TESTING / AUDITING

Reduction Deadline Standard:
Time at which the requested level of response is completely "off the system" (in minutes)

Aggregation Allowed Standard:
Indication of if composite / aggregate assets are allowed.

TELEMETRY

Real-Time Demand Measurement Required:
Measurement of the real-time demand for each Resource required: Yes / No.

Real-Time On-Site Generation Measurement:
If on-site generation is present; is metering required? Yes / No.

Accuracy:

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Precision of the Demand Measurement (or also of the On-Site Generator Output)

Reporting Interval:

The time between signals [in seconds]

Other Measurements:

If other variables are measured, a list should be provided here. Example include: quality flags, breaker status, response amount, etc.

Communication Protocol:

The IT protocol used to collect the data, such ICCP or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.

AFTER-THE-FACT MEASUREMENTS

On-Site Generation Meter Required:

Yes or No

Meter Accuracy:

Accuracy of the Meter Reading (or also of the On-Site Generator Output) and is the net accuracy, i.e. includes PT & CT

Clock / Time Accuracy:

Accuracy of the time measurement (if any) associated with the Meter Read time.

Details of Meter/Equipment Standards

Listing of any meter or equipment standards

North American Energy Standards Board

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Phone: (713) 356-0060, Fax: (713) 356-0067, E-mail: naesb@naesb.org
Home Page: www.naesb.org

Meter Data Reporting Deadline:

How often is the meter reading data sent to the ISO/RTO related to demand response reporting. May be absolute or relative to Event period. Also, those entries marked "Daily" or "Monthly" happens regardless of the existence of an Event.

Granularity:

The level of detail in the reported data. For example, if the Meter Data Reporting Deadline = “within 24 hours”, the Granularity might be “1 hour”.

Validating, Editing & Estimating (VEE) Method:

An indication of how missing data are managed, for example, Skipped, Estimated & Flagged, etc.

Rules for Statistical Sampling:

If statistical sampling is allowed, a brief summary of the rules associated with the estimates, for example, minimum percentage of physical measurements.

PERFORMANCE / BASELINE

Baseline Types:

Either "Meter-Before vs. Meter-After", "Comparable Day", "Statistical Algorithm" , "Behind the Meter Generation Data", "Firm Service Level Drop"

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WHOLESALE MATRIX DRAFT PROPOSED STANDARDS OUTLINE

Business Practice Requirements: Energy Products

PROVISIONS OF MEASUREMENT AND VERIFICATION STANDARDS

Applicability

Purpose

WHOLESALE MARKET DEMAND RESPONSE PRODUCTS

Wholesale Products:
The commodity that is being offered: Regulation, Reserve, Energy, or Capacity.

INITIAL QUALIFICATION / TESTING / AUDITING

Reduction Deadline Standard:
Time at which the requested level of response is completely "off the system" (in minutes)

Aggregation Allowed Standard:
Indication of if composite / aggregate assets are allowed.

TELEMETRY

Real-Time Demand Measurement Required:
Measurement of the real-time demand for each Resource required: Yes / No.

Real-Time On-Site Generation Measurement:
If on-site generation is present; is metering required? Yes / No.

Accuracy:

Precision of the Demand Measurement (or also of the On-Site Generator Output)

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Reporting Interval:

The time between signals [in seconds]

Other Measurements:

If other variables are measured, a list should be provided here. Example include: quality flags, breaker status, response amount, etc.

Communication Protocol:

The IT protocol used to collect the data, such ICCP or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.

AFTER-THE-FACT MEASUREMENTS

On-Site Generation Meter Required:

Yes or No

Meter Accuracy:

Accuracy of the Meter Reading (or also of the On-Site Generator Output) and is the net accuracy, i.e. includes PT & CT

Clock / Time Accuracy:

Accuracy of the time measurement (if any) associated with the Meter Read time.

Details of Meter/Equipment Standards

Listing of any meter or equipment standards

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Granularity:

The level of detail in the reported data. For example, if the Meter Data Reporting Deadline = “within 24 hours”, the Granularity might be “1 hour”.

Validating, Editing & Estimating (VEE) Method:

An indication of how missing data are managed, for example, Skipped, Estimated & Flagged, etc.

Rules for Statistical Sampling:

If statistical sampling is allowed, a brief summary of the rules associated with the estimates, for example, minimum percentage of physical measurements.

PERFORMANCE / BASELINE

Baseline Types:

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Business Practice Requirements: Capacity Products

PROVISIONS OF MEASUREMENT AND VERIFICATION STANDARDS

Applicability

Purpose

WHOLESALE MARKET DEMAND RESPONSE PRODUCTS

Wholesale Products:
The commodity that is being offered: Regulation, Reserve, Energy, or Capacity.

INITIAL QUALIFICATION / TESTING / AUDITING

Reduction Deadline Standard:
Time at which the requested level of response is completely "off the system" (in minutes)

Aggregation Allowed Standard:
Indication of if composite / aggregate assets are allowed.

TELEMETRY

Real-Time Demand Measurement Required:
Measurement of the real-time demand for each Resource required: Yes / No.

Real-Time On-Site Generation Measurement:
If on-site generation is present; is metering required? Yes / No.

Accuracy:

Precision of the Demand Measurement (or also of the On-Site Generator Output)

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Reporting Interval:

The time between signals [in seconds]

Other Measurements:

If other variables are measured, a list should be provided here. Example include: quality flags, breaker status, response amount, etc.

Communication Protocol:

The IT protocol used to collect the data, such ICCP or any other named system. If a non-standard system is used, description should include a brief overview of the transport, i.e. Internet, Dedicated Network, Wireless, FM, etc.

AFTER-THE-FACT MEASUREMENTS

On-Site Generation Meter Required:

Yes or No

Meter Accuracy:

Accuracy of the Meter Reading (or also of the On-Site Generator Output) and is the net accuracy, i.e. includes PT & CT

Clock / Time Accuracy:

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NAESB ORDER NO. 698 ACTIVITIES
APRIL 30, 2008

The following status report includes:

- Meeting summaries Page 2

  NAESB has been holding subcommittee meetings to develop standards for the wholesale gas market to support the requests of FERC Order No. 698. A brief synopsis of each meeting is given.

- Reference documents, timelines and synopsis of regulatory action Page 4

  Several excellent reference documents are available that review gas-electric coordination. This section provides a timeline of events, links to the reference documents and a synopsis of the regulatory actions.

- Proposed Indexed pricing standards Page 7

  NAESB has developed proposed standards for capacity release index pricing that are out for industry comment and should be considered by the NAESB Executive Committee in May.

- Proposed Redirect standard Page 12

  NAESB has developed a proposed standard for redirects that are out for industry comment and should be considered by the NAESB Executive Committee in May.

- Existing timelines Page 13

  The nomination timelines and electric market clearing times as they exist today are shown for comparison purposes.

- Models proposed for intraday nomination timeline changes presented in March and April Page 16

  Ten proposals for intraday nomination timeline modifications to better serve the electric market were presented for consideration at the March and April meetings:

  - APS/TVA models, both original and modified Page 16
  - Pipeline Collaborative Model Page 23
  - Two El Paso Natural Gas Models Page 25
  - Northern Border Model Page 30
  - Two TransCanada Pipeline Models Page 36
  - Two Iroquois Gas Transmission Models Page 39
  - FPL Model (constructed in the April meeting) Page 41

- Timeline considerations Page 42

  The subcommittee has development a list of timeline criteria that may be used in evaluating the intraday nomination timeline proposals.

- Evaluation against Criteria on April 23 Page 44

  The subcommittee has development a list of timeline criteria that may be used in evaluating the intraday nomination timeline proposals.

- Voting Record on April 23 Page 46

  The subcommittee has development a list of timeline criteria that may be used in evaluating the intraday nomination timeline proposals.

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NAESB ORDER NO. 698 MEETING SUMMARY
APRIL 30, 2008

ORDER NO. 698 EFFORT – ASSIGNED TO WGQ:

- **August 30-31, 2007:** The WGQ BPS met at the NAESB office in Houston, Texas to begin work on Order No. 698. During the meeting the participants heard presentations from those in the pipeline industry that have had experience with the issues presented by Order No. 698, and discussed the scope of WGQ Annual Plan Items 7a, 7b, and 7c. The group discussed the various approaches to addressing Order No. 698, and created a document capturing issues that will have to be considered as the group continues.
- **September 18-19, 2007:** The WGQ BPS met in Richmond, VA at the Dominion offices to continue work on Order No. 698. During the meeting, the Subcommittee developed scoping statements for WGQ Annual Plan Items 7a, and 7b, and continued their discussions regarding potential scoping issues to address as the group proceeds. Presentations were given in response to Annual Plan Items 7a and 7b, and the group drafted proposed modifications to WGQ Standard 5.3.26 in response to Annual Plan Item 7b. The Subcommittee also noted the need for proposals and work papers on Item 7c and encouraged those in attendance to prepare such for the next meeting.
- **October 9-10, 2007:** The WGQ BPS met at the NAESB offices in Houston, Texas to continue their efforts in addressing Order No. 698. During this meeting, the group reviewed proposals created in response to Annual Plan Items 7a and 7c, and continued their discussions concerning potential standards to address the Annual Plan Items. The group also began answering some of the scoping issues identified for Annual Plan Item 7b, and proposed varying standards language to respond.
- **October 30-31, 2007:** The WGQ BPS met in Houston at the NAESB offices to continue work on Order No. 698. The intraday nomination timeline work paper was presented with discussions on inclusion of regional differences. The work paper for redirects – alternate receipt point upstream of or an alternate delivery point downstream of a point of constraint was presented and discussed, including a number of proposed definitions. The work paper for additional index standards concepts was presented and discussed, including remarks on the inadvisability of using EDI for capacity release transactions.
- **November 14-15, 2007:** The WGQ BPS met in NYC at the KeySpan offices to continue work on Order No. 698. Discussion continued on possible standards language for redirects including the review of two sets of work papers. It is expected that a more complete proposal will be presented at the December meeting, including the definition of a constraint point. Additional work papers were presented regarding intraday nomination timelines. For the December meeting, it is expected that the pipelines will present a counter proposal and the existing proposal will be modified to include details on recalls and capacity release. The work paper for index-based pricing for capacity release was reviewed including draft standards language, some of which may imply daily bidding for volumetric indexed-based capacity releases. It is expected that further discussion on this proposal including changes reflected in the meeting will be a topic for December. Platts Energy provided a presentation in indexed pricing.
- **December 4-5, 2007:** The WGQ BPS met in Washington DC at the AGA offices to continue work on Order No. 698. The meeting focused on proposed standards for redirects and for price indexing for capacity release programs.
- **January 9-10, 2008:** The WGQ BPS met in Houston TX to continue work on Order No. 698. During the meeting, the redirect standard was approved and the price indexing standards were further reviewed and refined. The proposals for intraday nominations were introduced.

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NAESB ORDER NO. 698 MEETING SUMMARY
APRIL 30, 2008

- **January 25, 2008:** NAESB received and responded to correspondence from the Kansas Corporation Commission (http://www.naesb.org/pdf3/wgq_bps_698_012508corr_kcc.pdf – KCC Letter, http://www.naesb.org/pdf3/wgq_bps_698_012508corr_desselle.pdf, -- NAESB Response) regarding intraday nomination periods and the NAESB process.
- **February 8, 2008:** The WGQ BPS met via web cast/conference call to complete the review of the price indexing standards. While the review did not conclude, it is at most one or two meetings away from a vote.
- **February 21, 2008:** The WGQ BPS met via web cast/conference call to complete the review of the price indexing standards. The review did not conclude, but should complete with a vote at the meeting in March.
- **February 26-27, 2008:** The WGQ BPS met in a two-day session hosted PSEG in New Jersey. The primary focus of the meeting was on review and discussion of proposals for changes to intraday nominations timelines. A number of comments indicate strong support for a bumpable intraday nomination period that is more closely aligned with the electric market clearing times. The comments can be found on the NAESB web site (http://www.naesb.org/wgq/wgq_bps_698.asp), under the meeting date for February 26-27, 2008. Comments in support of adding an additional bumpable period were received from Arizona Corporation Commission (http://www.naesb.org/pdf3/wgq_bps_698_022608w10.doc) , Arizona Electric Power Corporative, Buckeye Power, Delaware Municipal Electric Corporation, El Paso Electric Company, Honeywell International, Kansas Corporation Commission, KeySpan/National Grid, Missouri Public Service Commission (http://www.naesb.org/pdf3/wgq_bps_698_022608w25.pdf), New York Independent System Operator, North Carolina Electric Membership Corporation, Old Dominion Electric Cooperative, Phelps Dodge, Salt River Project, Southwest Power Pool, Tucson Electric Power Company, Unisource Energy Services. The intraday timelines effort includes now a review of three proposals – TVA and APS, a pipeline collaborative, and EPNG (two models). All endeavor to more closely align the electric market requirements with the gas nomination deadlines.
- **March 12-13, 2008:** EPNG in Colorado Springs is the host of the meeting, the focus of which was two-fold – to complete the work on price indexing and to continue the discussion on intraday nomination proposals. In addition to the intraday proposal offered by Arizona Public Service/Tennessee Valley Authority, additional ones have been submitted from El Paso Natural Gas, Spectra Energy and TransCanada Pipelines.
- **April 22-23, 2008:** Iroquois Gas Transmission, Northern Border and FPL added models to the mix for review – with a full count of 10 models for options for intraday nominations. APS/TVA prepared a revised model and ISO-NE prepared a presentation overlaying gas schedules and electric schedules to highlight the discrepancies. The evaluation criteria were reviewed and additional text added for clarity. The models were compared against the evaluation criteria and straw balanced votes were taken to ascertain levels of support. The revised APS/TVA model, the FPL model prepared in the meeting passed and the pipeline collaborative model while failed, was a close vote. These thre models will be reviewed at the upcoming May meeting in DC.
- **May 19-20, 2008:** Hosted by Stinson Morrison and Hecker to continue the discussion on the intraday nomination models.
- **Other Meetings Planned in 2008:** 2008 calendar of meetings has been set and can be accessed from http://www.naesb.org/WGQ/wgq_bps_698.asp.

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NAESB ORDER NO. 698 REFERENCE DOCUMENTS, TIMELINE AND SYNOPSIS
APRIL 30, 2008

REFERENCE DOCUMENTS -- RELATED WORK PAPERS:

- WGQ Annual Plan (http://www.naesb.org/pdf2/bd062807a1.doc) approved by the Board of Directors, June 28, 2007 and the WGQ Annual Plan for 2008 (http://www.naesb.org/pdf3/wgq_2008_annual_plan.doc), approved by the Board on December 13, 2007.
- FERC Order No. 698 (http://www.naesb.org/doc_view2.asp?doc=ferc062507.doc): Issued June 25, 2007 - FERC Final Rule - Order No. 698 re FERC's amendment to its open access regulations governing standards for business practices and electronic communications with interstate natural gas pipelines and public utilities under RM96-1.
- NRRI Primer (http://www.naesb.org/doc_view2.asp?doc=nrri_0706.pdf), Dated July 2006 - The National Regulatory Research Institute (NRRI), Briefing Paper - Efforts to Harmonize gas Pipeline Operations With the Demands of the Electricity Sector
- DoE Primer (http://www.naesb.org/doc_view2.asp?doc=icf_geic_primer062206.pdf), Dated June 22, 2006 - Summary of NAESB Gas and Electric Interdependency Final Report to the FERC in Docket No. RM05-28-000 "NAESB Report on the Efforts of the Gas-Electric Interdependency Committee".
- NAESB Report (http://www.naesb.org/doc_view2.asp?doc=ferc022406.pdf), Dated February 24, 2006 - Docket No. RM05-28-000, NAESB Final Report on the Efforts of the Gas-Electric Interdependency Committee.

FERC ORDER NO. 698 – TIMELINE OF EVENTS:

- **November 14, 2003:** Letter from Chm. Wood asking NAESB to develop interdependency standards – related to 2003 cold snap in New England, which resulted in a NAESB Gas-Electric Coordination subcommittee
- Gas-Electric Coordination efforts resulted in two reports:
  - Gas Electric Coordination Interim Status Report, **filed 4-16-04,** 31 issues identified
  - Gas Electric Coordination Final Report, **filed 11-30-04,** 31 issues further defined
- Outcome of Reports: Received 3 requests for standards development: R04016: Energy Day, R04020: Market Timelines, R04021: Pipeline-Generator Communications
- All requests approved and found within the scope of NAESB by both NAESB and the Joint Interface Committee (including NERC and the ISO-RTO Council)
- R04016 and R04021 were jointly assigned to wholesale gas and wholesale electric groups, R04020 was assigned to wholesale electric group only -- Two pronged approach: Work began on R04021, and Board Committee formed to determine other actions
- Results of approach -- Report filed with FERC on June 26, 2005 with gas-electric interdependency communication standards (Interim GEIC Report) and Requests R04016 and R04020 were withdrawn
- **February 24, 2006:** NAESB identifies 6 Interdependency Issues raised in Docket No. RM05-28-000 (Final GEIC Report)
- **June 22, 2006:** The U.S. Department of Energy sponsors the creation of a primer from Jimmy Glotfelty of ICF addressing issues in the GEIC report
- **July 30, 2006:** A primer from Ken Costello of NRRI is issued addressing issues identified in the GEIC Report

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- **October 25, 2006:** NOPR issued on standards. Order No. on Inquiry to the ISOs and RTOs. Comments were due 1-15-07 and data from the ISOs and RTOs forwarded on 1-16-07.
- **June 25, 2007**: FERC issued Order No. 698 (http://www.naesb.org/doc_view2.asp?doc=ferc062507.doc) regarding FERC's amendment to its open access regulations governing standards for business practices and electronic communications with interstate gas pipelines and public utilities under Docket Nos. RM96-1 and RM05-5-001 (Standards for Business Practices for Interstate Natural Gas Pipelines; Standards for Business Practices for Public Utilities).
- **August 31, 2007**: FERC issued a series of orders (http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20070831-3050) (Docket Nos. EL07-1 to EL07-6) terminating the six section 206 proceedings related to gas-electric coordination.
- **December 20, 2007**: FERC issued Order No. 698-A (http://www.naesb.org/doc_view2.asp?doc=ferc122007.pdf), Order on Clarification and Rehearing.

ORDER NO. 698 DECISIONS:

- Issued June 25, 2007
- Compliance with gas-electric communication standards by November 1, 2007
- Compliance Statements filed by November 1
- All standards incorporated by reference without change

ORDER NO. 698 STANDARDS ADOPTED:

- WEQ Standard 011-0.1/WGQ Standard 0.2.1 defines the term "Power Plant Operator."
- WEQ Standard 011-1.2/WGQ Standard 0.3.12 directs PPO & TSP to establish procedures to communicate material changes in circumstances that may impact hourly flow rates, and the power plant operator to provide projected hourly flow rates accordingly.
- WEQ Standard 011-1.3/WGQ Standard 0.3.13 states a PPO should not operate without an approved scheduled, may request daily flow rates as established by the standard, should work to resolve the PPO's request if it can be accommodated within the standard boundaries.
- WEQ Standard 011-1.4 and WGQ Standard 0.3.14 requires specified parties to sign up to receive critical notices from the appropriate TSP and the reciprocal TSP(s) to provide critical notices to parties specified in the Standard.
- WEQ Standard 011-1.5 requires upon request, a PPO must provide to the appropriate independent BA and/or RC pertinent information concerning the level of gas transportation service (firm or interruptible) and its natural gas supply (firm, fixed or variable quantity, or interruptible).
- WEQ Standard 011-1.6/WGQ Standard 0.3.15 requires specified parties to establish operational communication procedures with the appropriate TSP and/or PPO.

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NAESB ORDER NO. 698 REFERENCE DOCUMENTS, TIMELINE AND SYNOPSIS
APRIL 30, 2008

ORDER NO. 698 DIRECTION TO NAESB:

- ¶ 56 - "… Under the Commission regulations, the releasing shipper is responsible for clearly setting out the terms and conditions of the release and that would include the means for implementing the formula rate. This is also an issue on which NAESB can develop standards to ensure that such releases can be processed quickly and efficiently."
- ¶ 63 – "The Commission is not modifying its requirement for within-the-path scheduling as adopted in Order No. 637. The example posited by NAESB appears consistent with the within-the-path scheduling concept and with pipeline proposals that have been accepted. It would not be appropriate for the Commission here to try to provide generic clarification to cover all possible proposals by pipelines for according flexibility to shippers. These proposals will have to be judged on an individual basis. In addition, NAESB can consider through its consensus process possible standards for according increased receipt and delivery point flexibility."
- ¶ 69 – "As we stated in the NOPR, the Commission has recognized the interest of interruptible shippers in achieving business certainty by making the last intra-day nomination opportunity one in which firm nominations do not bump interruptible nominations. However, within the confines of current Commission policy, NAESB should actively consider whether changes to existing intra-day schedules would benefit all shippers, and provide better provide for coordination between gas and electric scheduling. In addition, the NAESB nomination timeline establishes only the minimum requirement to which pipelines must adhere."

ORDER NO. 698-A SYNOPSIS:

- Summary: "This order denies requests for rehearing, and provides clarification of the final rule issued on July 16, 2007 that incorporated by reference standards dealing with coordination of scheduling between electric utilities and natural gas pipelines that were promulgated by the Wholesale Gas Quadrant (WGQ) and the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB), and provided policy guidance on issues relating to such coordination."
- Summary: "In addition, the Commission provided policy guidance on issues raised by NAESB relating to scheduling coordination and to the possible development of additional standards by NAESB. First, the Commission discussed the use of gas indices for pricing capacity release transactions, stating that the Commission's regulations permit releasing shippers to use price indices or other formula rates on all pipelines, regardless of whether the pipeline has a provision allowing the use of indices as part of its discounting provisions, so long as the prices are less than the maximum rate in the pipeline's tariff. Second, the Commission discussed, but did not modify, the shipper's ability to choose alternate delivery points, stating that the ability to shift a delivery point when a pipeline constraint occurs upstream would make it easier for shippers to redirect gas supplies to generators when capacity is scarce. Lastly, the Commission discussed possible changes to the gas intraday nomination schedule, clarifying that NAESB should actively consider whether changes to existing intra-day schedules would benefit all shippers."
- ¶ 14 "The existing WGQ NAESB standards recognize that non-standard pricing terms may be included in release transactions, but do not necessarily permit such releases to be accorded the same processing timeline as standard releases. The Commission requested NAESB to consider standards that would create a standardized indexing methodology so that the use of indexed releases could become faster and could compete on a more equal footing with pipeline discounts and negotiated rate transactions."

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NAESB ORDER NO. 698 – (7A) INDEXED PRICING STANDARDS APPROVED BY THE SUBCOMMITTEE

The following Definitions, Modified and New Standards were approved by the NAESB WGQ Business Practices Order 698 Subcommittee on February 8, 2008, February 21, 2008, and March 12-13, 2008 for Recommendation – 2007 WGQ Annual Plan Item 7a

Proposed Modifications to WGQ Standards

Proposed Modified WGQ Standard No. 5.3.26 (Redline)
The ~~R~~releasing shipper ~~has choice to~~ should specify which one of the following methods is acceptable for bidding on a given capacity release offer:

- dollars and cents,
- ~~or~~ percent~~s~~age of maximum tariff rate, or
- Index-based formula as detailed in the capacity release offer.

~~in the denomination of bids and all transportation service providers should support this. Once the choice is made by the releasing shipper, the bids should comport with the choice.~~ The bids for the given capacity release offer should adhere to the method specified by the releasing shipper. The bidder may bid the maximum ~~tariff~~reservation rate, ~~if one is so stated,~~ in the Transportation Service Provider's tariff or general terms and conditions, ~~–~~if applicable, as an alternative to the method specified by the releasing shipper.

Proposed Modified WGQ Standard No. 5.3.26 (Clean)
The releasing shipper should specify which one of the following methods is acceptable for bidding on a given capacity release offer:

- dollars and cents,
- percentage of maximum tariff rate, or
- Index-based formula as detailed in the capacity release offer.

The bids for the given capacity release offer should adhere to the method specified by the releasing shipper. The bidder may bid the maximum reservation rate, in the Transportation Service Provider's tariff or general terms and conditions, if applicable, as an alternative to the method specified by the releasing shipper.

Proposed Modified WGQ Standard No. 5.3.1 (Redline)
The ~~C~~capacity ~~R~~release timeline ~~is applicable~~applies to all parties involved in the ~~C~~capacity ~~R~~release process~~; however, it is only applicable if~~ provided that:

1) ~~-~~all information provided by the parties to the transaction is valid and the acquiring shipper has been determined to be credit~~-~~worthy before the capacity release bid is tendered, ~~and~~
2) ~~-~~for index-based capacity release transactions, the releasing shipper has provided the capacity release service provider with sufficient instructions to evaluate the corresponding bid(s) according to the timeline, and
3) there are no special terms or conditions of the release.

Further, the capacity release service provider may complete the capacity release process on a different timeline if the offer includes unexpected requirements (e.g. designation of an index not supported by the Transportation Service Provider).

Proposed Modified WGQ Standard No. 5.3.1 (Clean)
The capacity release timeline applies to all parties involved in the capacity release process provided that:

1) all information provided by the parties to the transaction is valid and the acquiring shipper has been determined to be creditworthy before the capacity release bid is tendered,

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2) for index-based capacity release transactions, the releasing shipper has provided the capacity release service provider with sufficient instructions to evaluate the corresponding bid(s) according to the timeline, and
3) there are no special terms or conditions of the release.

Further, the capacity release service provider may complete the capacity release process on a different timeline if the offer includes unexpected requirements (e.g. designation of an index not supported by the Transportation Service Provider).

Proposed Modified WGQ Standard No. 5.3.3 (Redline)

For the capacity release business process timing model, only the following methodologies are required to be supported by capacity release service providers and provided to releasing shippers as choices from which they may select and, once chosen, should be used in determining the awards from the bid(s) submitted. They are: 1) highest rate, 2) net revenue and 3) present value. For index-based capacity release transactions, the releasing shipper should provide the necessary information and instructions to support the chosen methodology.

Other choices of bid evaluation methodology (including other releasing shipper defined evaluation methodologies) can be accorded similar timeline evaluation treatment at the discretion of the capacity release service provider. However, the capacity release service provider is not required to offer other choices or similar timeline treatment for other choices, nor, is the capacity release service provider held to the timeline should the releasing shipper elect another method of evaluation.

Proposed Modified WGQ Standard No. 5.3.3 (Clean)

For the capacity release business process timing model, only the following methodologies are required to be supported by capacity release service providers and provided to releasing shippers as choices from which they may select and, once chosen, should be used in determining the awards from the bid(s) submitted. They are: 1) highest rate, 2) net revenue and 3) present value. For index-based capacity release transactions, the releasing shipper should provide the necessary information and instructions to support the chosen methodology.

Other choices of bid evaluation methodology (including other releasing shipper defined evaluation methodologies) can be accorded similar timeline evaluation treatment at the discretion of the capacity release service provider. However, the capacity release service provider is not required to offer other choices or similar timeline treatment for other choices, nor, is the capacity release service provider held to the timeline should the releasing shipper elect another method of evaluation.

Proposed New WGQ Definitions and Standards

Proposed Definition 5.2.x1

For index-based capacity release transactions, Rate Floor is the term used to describe the lowest rate specified in the capacity release offer in dollars and cents that is acceptable to the releasing shipper. The Rate Floor may not be less than the Transportation Service Provider's (TSP) minimum reservation rate. If a Rate Floor is not otherwise specified, the TSP's minimum reservation rate should serve as the default value for the Rate Floor.

Proposed Definition 5.2.x2

For index-based capacity release transactions, Default Rate is the term used to describe the non-biddable rate specified in the capacity release offer to be used for invoicing purposes when the result of the index-based formula is unavailable or cannot be computed. If a Default Rate is not otherwise specified, the Rate Floor should serve as the Default Rate.

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Proposed WGQ Standard No. 5.3.x1
A Transportation Service Provider should support the upload of index-based capacity release offer and bid transactions exclusively via the use of NAESB WGQ EBB/EDM.

Proposed WGQ Standard No. 5.3.x2
For index-based capacity release transactions, the releasing shipper should specify which one of the following methods is acceptable for bidding on a given index-based capacity release offer:

- a percentage of the formula,
- a dollars and cents differential from the formula,
- a dollars and cents differential from the Rate Floor, or
- an approved methodology in the Transportation Service Provider's tariff, if any.

When bidding is based upon a dollars and cents differential from the Rate Floor, the invoiced rate for the award should be calculated as the greater of (i) the result of the formula or (ii) the Rate Floor plus the high bid's differential, both not to exceed the TSP's maximum reservation rate, if applicable.

Proposed WGQ Standard No. 5.3.x2a
For index-based capacity release transactions, the capacity release facilitator should support a Rate Floor to be specified by the releasing shipper in the capacity release offer.

Proposed WGQ Standard No. 5.3.x3
Unless otherwise specified in the Transportation Service Provider's (TSP) tariff, for index-based capacity release transactions where the result of the award is to be applied on a monthly basis, and the formula detailed in the capacity release award requires calculations on a daily basis, the results of such daily calculations may exceed the applicable maximum daily reservation rate or be less than the applicable minimum daily reservation rate. However, any resulting monthly reservation rate may not exceed the TSP's maximum monthly reservation rate, as applicable, or be less than the Rate Floor specified in the capacity release award.
If the resulting monthly reservation rate exceeds the TSP's maximum reservation rate, as applicable, the TSP's maximum reservation rate should be used for invoicing. If the resulting monthly reservation rate is less than the Rate Floor, the Rate Floor should be used for invoicing.

Proposed WGQ Standard No. 5.3.x4
For volumetric index-based capacity release transactions, where the result of the formula detailed in the capacity release award is to be applied on a daily basis, if the calculated daily rate exceeds the Transportation Service Provider's (TSP) applicable maximum reservation rate or is less than the Rate Floor specified in the capacity release award, the TSP's maximum reservation rate or the Rate Floor, respectively, should apply for invoicing.

Proposed WGQ Standard No. 5.3.x6
Initially, a Transportation Service Provider (TSP) should support at least two non-public price index references that are representative of receipt and delivery points on its system for fixed-price transactions with next-day or next-month delivery obligations. In any event, a TSP should support all price indices it references in its gas tariff, or general terms and conditions. In addition, a TSP should evaluate those publicly available price index references requested by the TSP's

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Service Requesters (SR) that do not require any license(s)/subscription(s) for their use and support those that are representative of the applicable receipt and delivery points.
The identity of all supported price index references should be posted on the TSP's Informational Postings Web site, including the duration of the license(s)/subscription(s) for posted price index reference(s). A TSP's support of any price index reference does not make it responsible for ensuring that a releasing shipper(s) or a replacement shipper(s) possesses any license/subscription that may be required to use such price index reference.
Upon request of a SR holding capacity which can be released on that TSP's system, the TSP, in consultation with its SRs, should review the price index references (including publicly available price index references), and update the price index references on the TSP's Informational Postings Web site to reflect the results of that consultation. Such review should occur no more frequently than annually.
Releasing shippers requesting the use of price index references not supported by the TSP will be responsible for providing/maintaining adequate license(s)/subscription(s) for the TSP for any additional price index reference(s) such that the TSP is able to reasonably determine that it is adequately licensed to fulfill its business responsibilities associated with index-based capacity release transactions. Such additional price index reference(s) will then be supported by the TSP and available for index-based capacity release transactions for the duration of the license(s)/subscription(s) and posted on the TSP's Informational Postings Web site. As an alternative to providing the TSP with a license(s)/subscription(s) to additional price index references, the releasing shipper may make other mutually agreed upon arrangements with the TSP.
The TSP retains the right to review the legal implications of any license/subscription, and with reasonable cause, require the agreement for the licensing of the support of such price index reference(s) to be revised to meet its concerns.

Proposed WGQ Standard No. 5.3.x7
For index-based capacity release transactions, upon mutual agreement between the releasing shipper and the Transportation Service Provider (TSP), the releasing shipper should provide the TSP and the replacement shipper with the detailed calculation of the reservation rate(s). Except as provided below, this rate(s) will be stated on the invoice provided by the TSP to the replacement shipper pursuant to the capacity release award. The results of the releasing shipper's calculations should conform to the capacity release award and/or to the TSP's minimum and maximum reservation rates, as applicable.

- For reservation and monthly volumetric index-based capacity release transactions, the detailed calculation should be provided in a mutually agreed upon format no later than the second Business Day of the month following the transportation under the release.
- For volumetric index-based capacity release transactions requiring a daily rate calculation, the detailed calculation should be provided in a report pursuant to NAESB WGQ Standard No. 5.3.x11.

If the report is not provided by the applicable deadline above or is deficient, the TSP will notify the releasing shipper to provide the TSP with a correct report within one Business Day. Thereafter, in the absence of a conforming report, the TSP will invoice the replacement shipper the greater of the Default Rate specified in the capacity release offer or the Rate Floor plus any differential specified in the capacity release award.
Upon notification to the TSP by both the releasing shipper and the replacement shipper that prior period adjustments to the calculated reservation rates used in the invoice are appropriate, invoiced amounts can be revised subsequently, upward or downward, to conform to the capacity release award, subject to the standards governing prior period adjustments within the NAESB WGQ Invoicing Related Standards.

Proposed WGQ Standard No. 5.3.x8
For index-based capacity release transactions, the rate to be used in the invoice should be the greater of:

- the results of the calculation of the formula from the capacity release award (if the formula cannot be calculated, the Default Rate specified in the capacity release offer), or
- the Rate Floor plus any differential as specified in the capacity release award.

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The rate used in the invoice should not be greater than the Transportation Service Provider's maximum reservation rate, as applicable.

Proposed WGQ Standard No. 5.3.x9

For index-based capacity release transactions, a Transportation Service Provider should support the ability of a releasing shipper to specify in the capacity release offer a non-biddable Default Rate. The Default Rate cannot be less than the Rate Floor, if any.

Proposed WGQ Standard No. 5.3.x11

For volumetric index-based capacity release transactions, where the releasing shipper performs invoicing calculations pursuant to NAESB WGQ Standard No. 5.3.x7, the Transportation Service Provider (TSP) should provide allocated quantities to the releasing shipper according to a mutually agreed upon timetable. The releasing shipper should have at least one Business Day to process the quantities prior to returning such invoicing information to the TSP in a tabular format.

The TSP should provide the allocated quantities to the releasing shipper in a tabular file to be described by the TSP. The first row of the file should contain the column headers and data should begin on the second row of the file. In addition, the first column should contain the applicable Gas Day(s).

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NAESB ORDER NO. 698 – (7B) REDIRECTS STANDARDS APPROVED BY THE SUBCOMMITTEE

The following Nomination Related Standard was approved by the NAESB WGQ Business Practices Order No. 698 Subcommittee on January 9, 2008 for Recommendation – 2007 WGQ Annual Plan Item 7b

Proposed WGQ Standard No. 1.3.x1:

To the extent the Transportation Service Provider's (TSP) other scheduling requirements are met, a TSP should support the ability of a Service Requester to redirect scheduled quantities to other receipt points upstream of a constraint point or delivery points downstream of a constraint point at any of the TSP's subsequent nomination cycle(s) for the subject gas day, at least under the same contract, without a requirement that the quantities be rescheduled through the point of constraint.

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS -- EXISTING NAESB WGQ STANDARD

Timely / Intraday Nomination Timeline -- Central Clock Time

Nomination Cycle	Nomination Deadline	Confirmation Deadline	Scheduled Quantity Available By	Flow Time
Timely	11:30 a.m. the day before the gas flows	3:30 p.m. the day before the gas flows	4:30 p.m. the day before the gas flows	9:00 a.m.
Evening	6:00 p.m. the day before the gas flows	9:00 p.m. the day before the gas flows	10:00 p.m. the day before the gas flows	9:00 a.m.
Intraday 1	10:00 a.m. the gas day	1:00 p.m. the gas day	2:00 p.m. the gas day	5:00 p.m.
Intraday 2 (no bump)	5:00 p.m. the gas day	8:00 p.m. the gas day	9:00 p.m. the gas day	9:00 p.m.

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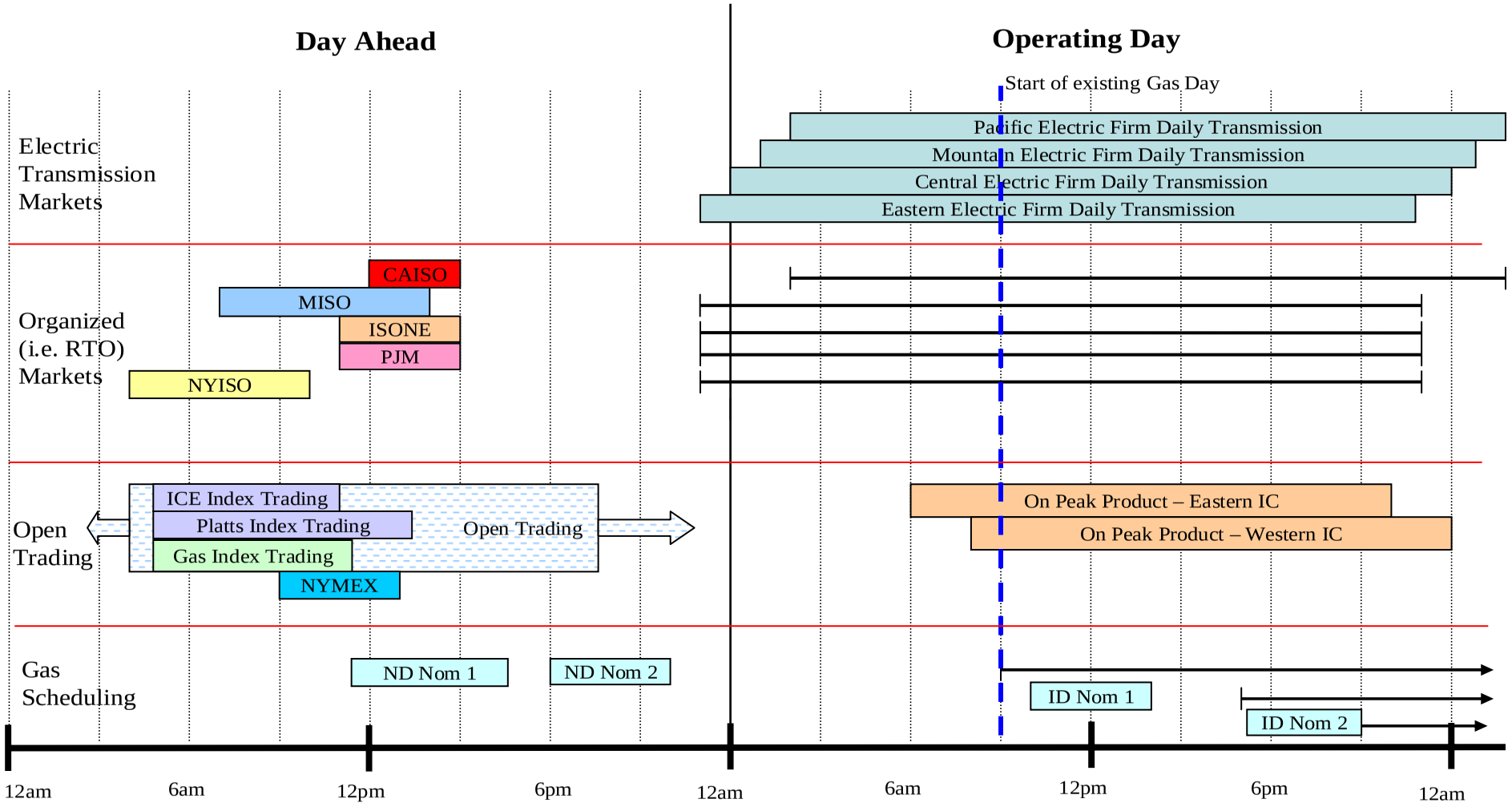

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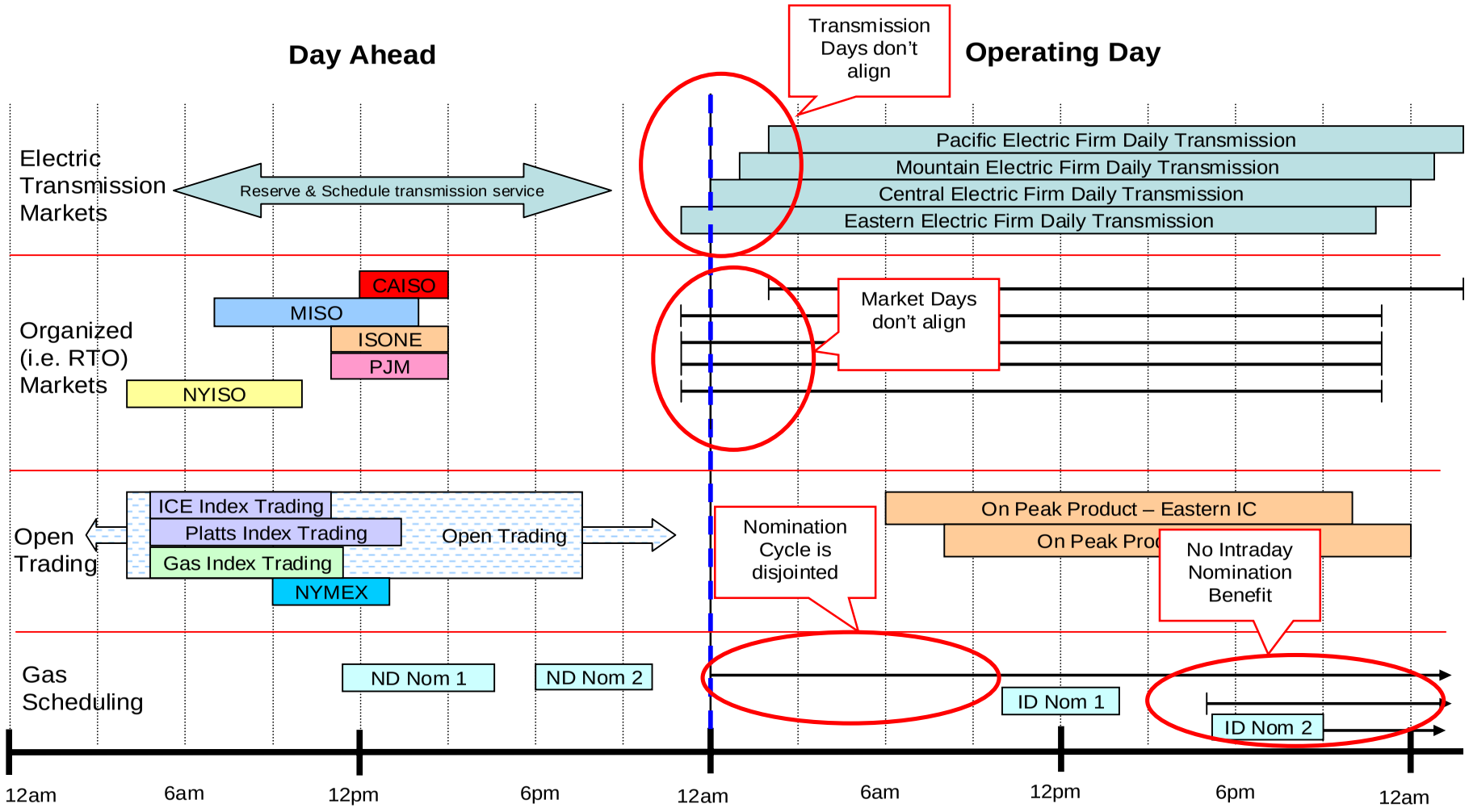

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TVA AND APS AS OF MARCH 22 AND APRIL 17, 2008

Timely / Intraday Nomination Timeline Proposed by TVA and APS

Nomination Cycle	Nomination Deadline	Confirmation Deadline	Scheduled Quantity Available By	Flow Time
Timely (Cycle 1)	**11:30 a.m.** the day before the gas flows	***1:30 p.m. the day before the gas flows***	***2:30 p.m. the day before the gas flows***	**9:00 a.m.**
Evening (Cycle 2)	**6:00 p.m.** the day before the gas flows	***8:00 p.m. the day before the gas flows***	***9:00 p.m. the day before the gas flows***	**9:00 a.m.**
Intraday 1 (Cycle 3)	***9:00 a.m. the gas day***	***11:00 a.m. the gas day***	***12:00 p.m. the gas day***	***3:00 p.m.***
Intraday 2 (Cycle 4)	***4:00 p.m. the gas day***	***6:00 p.m. the gas day***	***7:00 p.m. the gas day***	***7:00 p.m.***
Intraday 3 (Cycle 5) No Bump	***8:00 p.m. the gas day***	***9:30 p.m. the gas day***	***10:00 p.m. the gas day***	***10:00 p.m.***
Intraday 4 (Cycle 6) No Bump	***5:00 a.m. the gas day (EDI is not available for this cycle)***	***6:30 a.m. t he gas day***	***7:00 a.m. the gas day***	***7:00 a.m.***

Italic Denotes New or Changed

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TVA AND APS AS OF MARCH 22 AND APRIL 17, 2008

	Timely Cycle 1	Evening Cycle 2	Intraday 1 Cycle 3	Intraday 2 Cycle 4	Intraday 3 Cycle 5 (no bump)	Intraday 4 Cycle 6 (no bump)
Releasing Shipper Recall Notice	8:00 a.m.	EE 3:00 p.m. E 5:00 p.m.	6:00 a.m.	1:00 p.m.	5:30 p.m.	2:30 a.m.
TSP Recall Notice	9:00 a.m.	EE 4:00 p.m. E 6:00 p.m.	7:00 a.m.	2:00 p.m.	6:30 p.m.	3:30 a.m.
Capacity Release Offer (Pre-Arranged-Non Biddable)	10:30 a.m.	5:00 p.m.	8:00 a.m.	3:00 p.m.	7:00 p.m.	4:00 a.m.
TSP Capacity Release Award (Pre-Arranged-Non Biddable)	11:29 a.m.	5:59 p.m.	8:59 a.m.	3:59 p.m.	7:59 p.m.	4:59 a.m.
Nomination Deadline	11:30 a.m.	6:00 p.m.	9:00 a.m.	4:00 p.m.	8:00 p.m.	5:00 a.m.
Capacity Release Offer (Biddable)	12:00 p.m.	N/A	N/A	N/A	N/A	N/A
Open Season Capacity Bidding Ends	1:00 p.m.	N/A	N/A	N/A	N/A	N/A
Confirmation Deadline	1:30 p.m.	8:00 p.m.	11:00 a.m.	6:00 p.m.	9:30 p.m.	6:30 a.m.
TSP Capacity Release Award (Biddable)	2:00 p.m.	N/A	N/A	N/A	N/A	N/A
Open Season Capacity Match & Award (Biddable)	2:30 p.m.	N/A	N/A	N/A	N/A	N/A
Scheduled Quantity Deadline	2:30 p.m.	9:00 p.m.	12:00 p.m.	7:00 p.m.	10:00 p.m.	7:00 a.m.
Open Season Capacity Match & Award (Pre-Arranged)	3:00 p.m.	N/A	N/A	N/A	N/A	N/A
Flow Time	9:00 a.m.	9:00 a.m.	3:00 p.m.	7:00 p.m.	10:00 p.m.	7:00 a.m.
# of Gas Flow Hours	24 Hours	24 Hours	18 Hours	14 Hours	11 Hours	2 Hours

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TVA AND APS AS OF MARCH 22 AND APRIL 17, 2008

Deadline	All Cycles
2:30 AM	Releasing Shipper Recall Notice for Intraday 4 (Cycle 6) for today's flow.
3:30 AM	Pipeline provides notification of Intraday 4 (Cycle 6) Recall to all affected Replacement Shippers for today's flow.
4:00 AM	Non-Biddable Offer posting for Intraday 4 (Cycle 6) Offer for today's flow.
4:59 AM	Capacity Release Award (Biddable Not Pre-Arranged) for Intraday 4 (Cycle 6)
5:00 AM	Intraday 4 (Cycle 6 -No Bump) Nomination deadline for today's flow. EDI is not available for this cycle.
6:00 AM	Releasing Shipper Recall Notice for Intraday 1 (Cycle 3) for today's flow.
6:30 AM	Confirmation Deadline of Intraday 4 (Cycle 6-No Bump) for today's flow.
7:00 AM	Pipeline provides notification of Intraday 1 (Cycle 3) Recall to all affected Replacement Shippers for today's flow. Receipt of Intraday 4 (Cycle 6-No Bump) Scheduled Quantity and start of Gas Flow for Intraday 4 (Cycle 6-No Bump).
8:00 AM	Timely (Cycle 1) Recall Notification provided by a Releasing Shipper & reput deadline for tomorrow's flow. Capacity Release (Non-Biddable Offer) posting for Intraday 1 (Cycle 3) for today's flow.
8:59 AM	Capacity Release Award, Posting & Contracting of (Pre-arranged Non Biddable) for Intraday1 (Cycle 3)
9:00 AM	Start of Gas Flow (Timely - Cycle 1). Pipeline notification of Timely Recall to all affected Replacement Shippers for tomorrow's flow. Start of Gas Flow (Evening - Cycle 2). Intraday 1 (Cycle 3) Nomination deadline for today's flow.
10:30 AM	Capacity Release (Non-Biddable Offer) posting for Timely (cycle 1) Offer for tomorrow's flow.

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TVA AND APS AS OF MARCH 22 AND APRIL 17, 2008

Deadline	All Cycles
11:00 AM	Confirmation Deadline of Intraday 1 (Cycle 3) for today's flow.
11:29 A.M.	Capacity Release Award, Posting & Contracting (Pre-arranged Non-biddable) for Timely (Cycle 1)
11:30 AM	Timely (Cycle 1) Nomination deadline for tomorrow's flow.
12:00 PM	Capacity Release Offer (Biddable) due for Timely (Cycle 1) effective 2 days out.
	Receipt of Intraday 1 (Cycle 3) Scheduled Quantity for today's flow.
1:00 PM	Capacity Release Open Season Bidding Period Ends
	Releasing Shipper Recall Notice for Intraday 2 (Cycle 4) for today's flow.
1:30 PM	Confirmation Deadline of Timely (Cycle 1) for tomorrow's flow.
2:00 PM	Capacity Release Award Posting if no match (Biddable)
	Pipeline notification of Intraday 2 (Cycle 4) Recall to all affected Replacement Shippers for today's flow.
2:30 PM	Open Season Capacity (biddable) deadline to Match
	Receipt of Timely (Cycle 1) Scheduled quantity for tomorrow's flow.
3:00 PM	Open Season Capacity Award & Posting (Prearranged) when match required for Offer.
	Non-Biddable Offer posting for Intraday 2 (Cycle 4) Offer for today's flow.
	Early Evening Recall Notification provided by a Releasing Shipper for tomorrow's flow.
	Start of Gas Flow for Intraday 1 (Cycle 3).
3:59 PM	Capacity Release Award/posting & Contracting (Pre-arranged Non-biddable) for Intraday 2 (Cycle 4)
4:00 PM	Pipeline provides notification of Evening Recall to all affected Replacement Shippers (from Early Evening Notification) for tomorrow's flow.
	Intraday 2 (Cycle 4) Nomination deadline for today's flow.
5:00 PM	Non-Biddable Offer posting for Evening (Cycle 2) Offer for tomorrow's flow.

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TVA AND APS AS OF MARCH 22 AND APRIL 17, 2008

Deadline	All Cycles
5:30 PM	Releasing Shipper Recall Notice for Intraday 3 (Cycle 5) for today's flow.
5:59 PM	Capacity Release Award/Posting & Contracting (Pre-Arranged Non-Biddable) for Evening (Cycle 2)
6:00PM	Evening (Cycle 2) Nomination deadline for tomorrow's flow. Pipeline provides notification of Evening (Cycle 2) Recall to all affected Replacement Shippers for tomorrow's flow. Confirmation Deadline of Intraday 2 (Cycle 4) for today's flow.
6:30PM	Pipeline provides notification of Intraday 3 (Cycle 5) Recall to all affected Replacement Shippers for today's flow.
7:00 PM	Receipt of Intraday 2 (Cycle 4) Scheduled quantities and start of Gas Flow for Intraday 2 (Cycle 4). Non-Biddable Offer posting for Intraday 3 (Cycle 5) Offer for today's flow.
7:59 PM	Capacity Release Award, Posting & Contracting (Pre-Arranged Non-Biddable) for Intraday 3 (Cycle 5)
8:00 PM	Confirmation Deadline of Evening (Cycle 2) for tomorrow's flow. Intraday 3 (Cycle 5-No Bump) Nomination deadline for today's flow.
9:00 PM	Receipt of Evening (Cycle 2) Scheduled quantities for tomorrow's flow.
9:30 PM	Confirmation Deadline of ID3 (cycle 5--No Bump) for today's flow.
10:00 PM	Receipt of Intraday 3 (Cycle 5-No Bump) Scheduled quantities and start of Gas Flow for Intraday 5 (Cycle 5)

Color code:	
	Timely
	Evening (Cycle 2)
	ID1 (Cycle 3)
	ID2 (Cycle 4)
	ID3 (Cycle 5)
	ID4 (Cycle 6)

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TVA AND APS AS OF MARCH 22 AND APRIL 17, 2008

Deadline	All Cycles
EPKQ/ EPSQ:	Timely - Cycle 1 is not effected as it occurs prior to the start of gas day flow.
Not updated	Evening - Cycle 2 is not effected as it occurs prior to the start of gas day flow.
	Intraday 1 (Cycle 3) contract/scheduled quantity may only be reduced by 2/3.
	Intraday 2 (Cycle 4) contract/scheduled quantity may only be reduced by 1/2.

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TVA AND APS AS OF MARCH 22 AND APRIL 17, 2008

APS/TVA Revised Proposal dated April 17, 2008:

Nomination Cycle	Nomination Deadline	Confirmation Deadline	Scheduled Quantity Available By	Flow Time
Timely (Cycle 1)	**12:00 p.m.** the day before the gas flows	**3:00 p.m.** the day before the gas flows	**4:00 p.m.** the day before the gas flows	**9:00 a.m.** the next day
Evening (Cycle 2)	**5:00 p.m.** the day before the gas flows	**8:00 p.m.** the day before the gas flows	**9:00 p.m.** the day before the gas flows	**9:00 a.m.** the next day
Intraday 0.5 (Cycle 2)	**7:00 a.m.** the gas day	**10:00 a.m.** the gas day	**11:00 a.m.** the gas day	**12:00 p.m.** the same day
Intraday 1 (Cycle 3)	**11:30 a.m.** the gas day	**2:30 p.m.** the gas day	**3:00 p.m.** the gas day	**5:00 p.m.** the same day
Intraday 2 (Cycle 4)	**3:30 p.m.** the gas day	**6:30 p.m.** the gas day	**7:00 p.m.** the gas day	**9:00 p.m.** the same day
Intraday 3 (Cycle 5) No Bump	**7:30 p.m.** the gas day	**10:00 p.m.** the gas day	**11:00 p.m.** the gas day	**12:00 a.m.** the same day

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM PIPELINE COLLABORATIVE

Pipeline Collaborative Workpaper – Intra-Day Timelines
February 22, 2008

The following Pipelines support the Pipeline Collaborative Workpaper for changes to the Intra-day Timelines:

Algonquin Gas Transmission, LLC
ANR Pipeline Company
Dominion Cove Point LNG, LP
Dominion South Pipeline Company, LP
Dominion Transmission Inc.
East Tennessee Natural Gas, LLC
Egan Hub Storage, LLC
Florida Gas Transmission Company
Gulfstream Natural Gas System, L. L. C
Kinder Morgan Natural Gas Pipelines
Maritimes & Northeast Pipeline, L.L.C.
Moss Bluff Hub Partners, L.P.
Natural Gas Pipeline
North Baja Pipeline
Panhandle Eastern Pipe Line Company
Saltville Gas Storage Company L. L. C.
Sea Robin Pipeline Company
Southwest Gas Storage Company
Texas Eastern Transmission, LP
TransCanada Gas Transmission Northwest
Transwestern Pipeline Company
Trunkline Gas Company
Trunkline LNG Company
Tuscorora Gas Transmission
Williams Gas Pipelines

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM PIPELINE COLLABORATIVE

	Biddable Cap Rel	Morning AKA - ID 0.5 Bump	Timely	ID1 Bump	ID1**	Evening Bump	ID2 No-Bump
Gas Flow Hours		21	24	15	16	24	9
Scheduling Deadlines							
Nomination Deadline		7:00 AM	11:00 AM	1:00 PM	2:30 PM	4:00 PM	7:00 PM
Confirmation Deadline		10:00 AM	2:00 PM	4:00 PM		7:00 PM	10:00 PM
Scheduled Quantities		11:00 AM	3:00 PM	5:00 PM	5:00 PM	8:00 PM	11:00 PM
Gas Flow		12:00 PM Noon	9:00 AM	6:00 PM	5:00 PM	9:00 AM	12:00 AM Midnight
Biddable Capacity Release Transactions							
Biddable Capacity Release Offer	12:00 PM						
Capacity Release Bid Period Ends	1:00 PM						
Capacity Release Award if no match	2:00 PM						
Match deadline	2:30 PM						
Capacity Release Award with Match	3:00 PM						
Recall/Reput Transactions							
Releasing Shipper Recall Notice		*NONE*	*7:00 AM*	*10:00 AM*		*1:00 PM*	*NONE*
Reput			*7:00 AM*				
Pipeline notifies of recall		*NONE*	*8:00 AM*	*11:00 AM*		*2:00 PM*	*NONE*
Non-Biddable Capacity Releases							
Non-biddable offer posting		*NONE*	*10:00 AM*	*12:00 PM*		*3:00 PM*	*6:00 PM*
Non-biddable capacity release award, posting & contracting		*NONE*	*10:59 AM*	*12:59 PM*		*3:59 PM*	*6:59:PM*

** ID1 added to reflect February Discussions.

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM PIPELINE COLLABORATIVE

Eliminates overlap between cycles.

Keeps the 3-hour processing time between nominations and confirmation deadlines for all cycles.

Eliminate the E-Evening Recall Cycle - effectively the ability to recall is still there for the Evening Cycle and it is earlier in the day so shippers have a better chance of finding someone to purchase capacity from since it is still during normal business

Morning Cycle Comes after Morning Peak, but allows shippers who may not know that they have to flow or need changes for the next day, a chance to get 21 hours of flow next day.

Proposed change to the Intraday Cycle - with Bumping allows shippers to nominate and flow in time for the Evening Peak in most time zones

Middle of the night changes are minimized.

Any after hours cycles should be exempt from Capacity Release and EDI requirements.

All contracting / capacity release is done during daytime hours.

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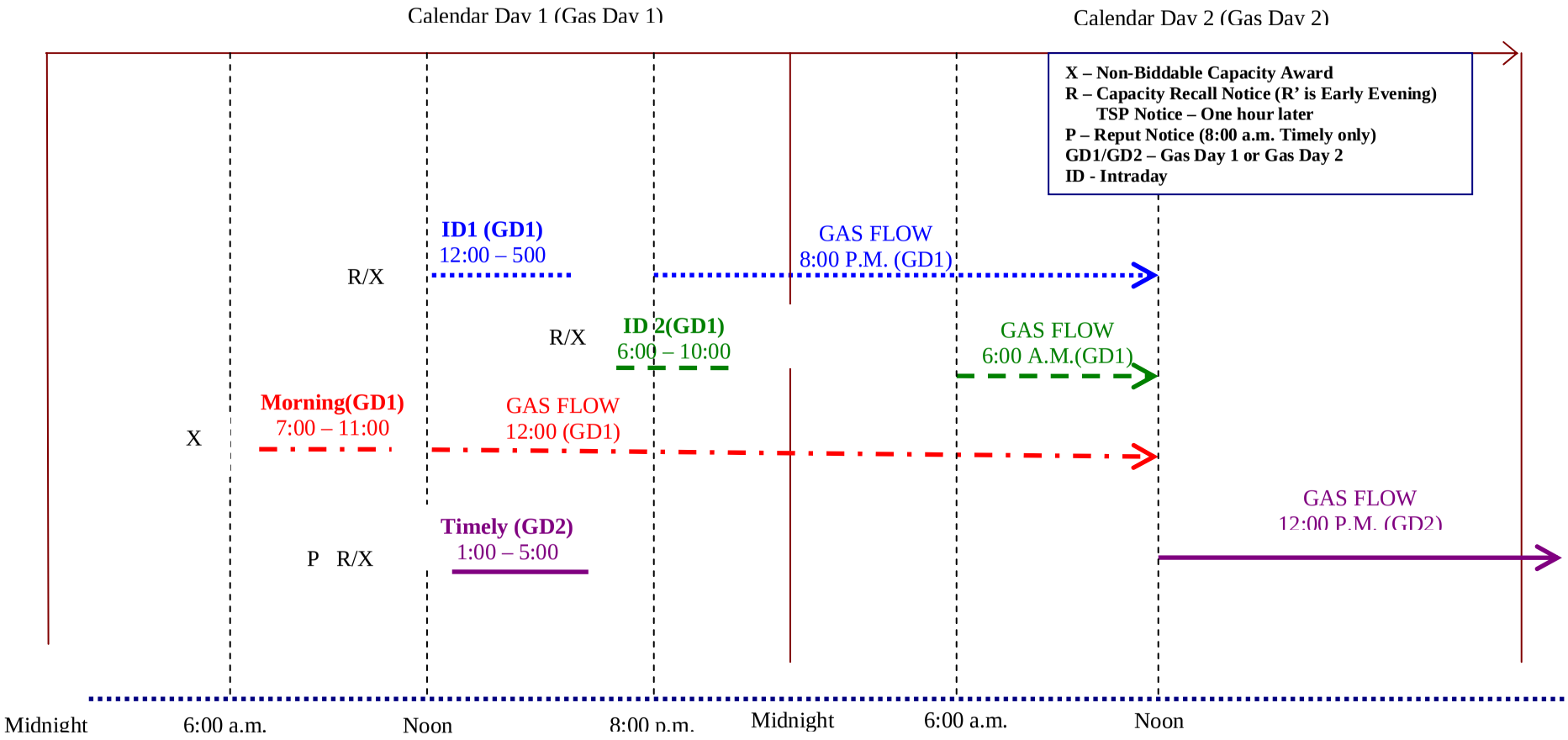

12:00 PM CDT GAS DAY/CALENDAR DAY

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12:00 PM CDT GAS DAY/CALENDAR DAY				
	TIMELY	**MORNING**	**INTRADAY 1**	**INTRADAY 2**
NON-BID CAP REL AWARD POSTING	12:00 p.m.	6:00 a.m.	11:00 a.m.	5:00 p.m.
CAPACITY RECALL NOTICE	10:00 a.m.	6:00 a.m.	11:00 a.m.	5:00 p.m.
NOMINATION	1:00 p.m.	7:00 a.m.	12:00 p.m.	6:00 p.m.
NOM CONFIRM	4:00 p.m.	10:00 a.m.	3:00 p.m.	9:00 p.m.
NOM REPORT	5:00 p.m.	11:00 a.m.	4:00 p.m.	10:00 p.m.
GAS FLOW	12:00 p.m. (Gas Day 2)	12:00 p.m. (Gas Day 1)	8:00 p.m. (Gas Day 1)	6:00 a.m. (Gas Day 1)

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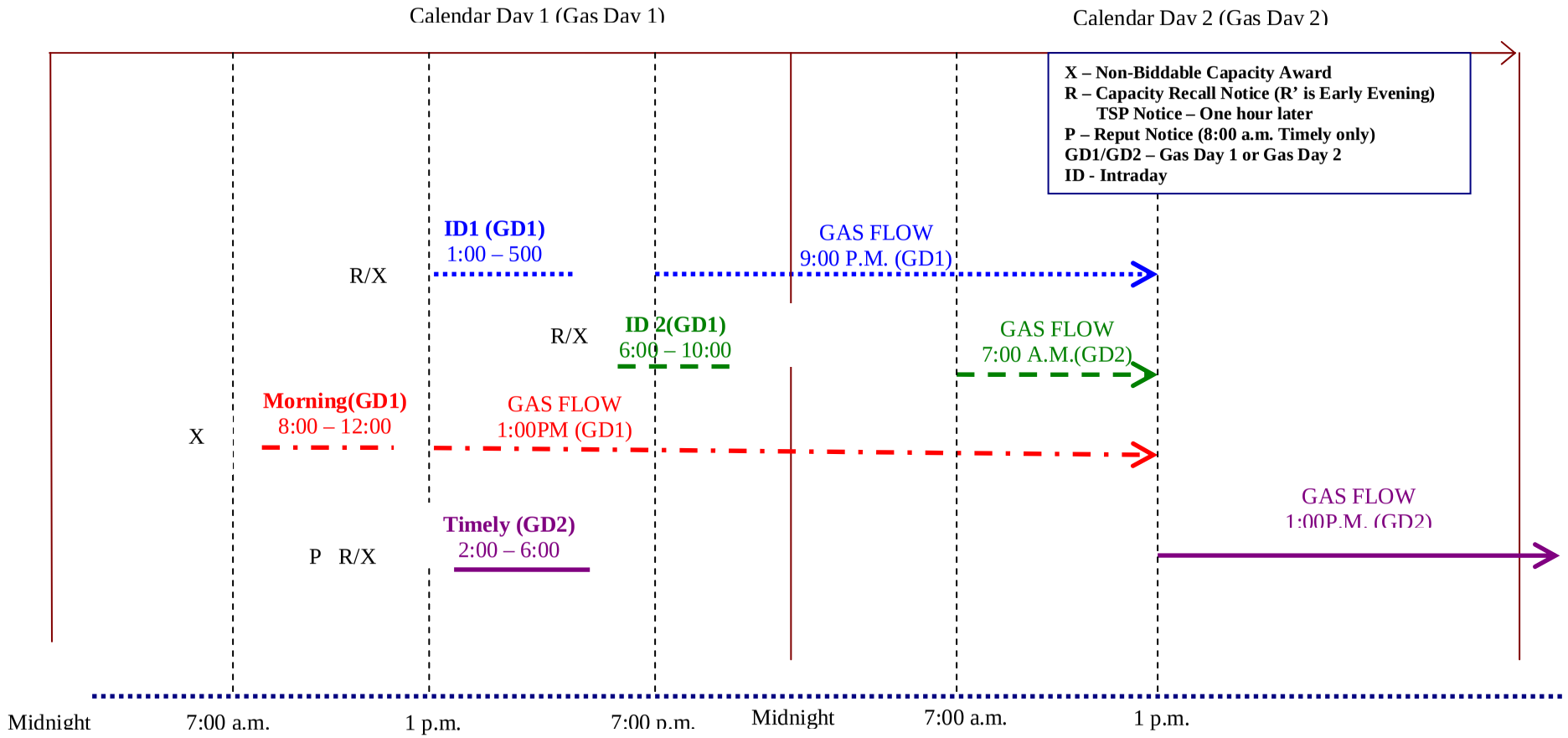
NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM EPNG



1:00 PM CDT GAS DAY/CALENDAR DAY

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1:00 PM CDT GAS DAY/CALENDAR DAY				
	TIMELY	**MORNING**	**INTRADAY 1**	**INTRADAY 2**
NON-BID CAP REL AWARD POSTING	1:00 p.m.	7:00 a.m.	12:00 p.m.	5:00 p.m.
CAPACITY RECALL NOTICE	11:00 a.m.	7:00 a.m.	12:00 p.m.	5:00 p.m.
NOMINATION	2:00 p.m.	8:00 a.m.	1:00 p.m.	6:00 p.m.
NOM CONFIRM	5:00 p.m.	11:00 a.m.	4:00 p.m.	9:00 p.m.
SCH QTY REPORT	6:00 p.m.	12:00 p.m.	5:00 p.m.	10:00 p.m.
GAS FLOW	1:00 p.m. (Gas Day 2)	1:00 p.m. (Gas Day 1)	9:00 p.m. (Gas Day 1)	7:00 a.m. (Gas Day 1)

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM NORTHERN BORDER PIPELINE

3 Cycle Scheduling Proposal **Draft - For Discussion Purposes**

Northern Border Pipeline

Capacity Release	Cycle #1 (Timely)	Cycle #2 (Intra-day A)	Cycle #3 (Intra-day B)
Administrative Timeline	24 Hours	16 Hours	8 Hours

CCT Gas Day	PCT	MCT	CCT	ECT	
	6:00	7:00	8:00	9:00	
	6:30	7:30	8:30	9:30	
	7:00	8:00	9:00	10:00	
	7:30	8:30	9:30	10:30	
	8:00	9:00	10:00	11:00	
	8:30	9:30	10:30	11:30	
	9:00	10:00	11:00	12:00	
	9:30	10:30	11:30	12:30	
	10:00	11:00	12:00	13:00	
	10:30	11:30	12:30	13:30	
					BCR Open Season Ends @ 13:00 CCT
	11:00	12:00	13:00	14:00	
	11:30	12:30	13:30	14:30	
	12:00	13:00	14:00	15:00	
	12:30	13:30	14:30	15:30	
	13:00	14:00	15:00	16:00	
					Contract Completed by 16:00 CCT
	13:30	14:30	15:30	16:30	
	14:00	15:00	16:00	17:00	
					Posting of NBPR @ 16:30 CCT
	14:30	15:30	16:30	17:30	
					Contract Completed by 17:30 CCT
	15:00	16:00	17:00	18:00	
	15:30	16:30	17:30	18:30	
	16:00	17:00	18:00	19:00	
	16:30	17:30	18:30	19:30	
	17:00	18:00	19:00	20:00	

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM NORTHERN BORDER PIPELINE

3 Cycle Scheduling Proposal **Draft - For Discussion Purposes**

Northern Border Pipeline

					Capacity Release	Cycle #1 (Timely)	Cycle #2 (Intra-day A)	Cycle #3 (Intra-day B)
					Administrative Timeline	24 Hours	16 Hours	8 Hours
17:30	18:30	19:30	20:30					
18:00	19:00	20:00	21:00					
18:30	19:30	20:30	21:30					
19:00	20:00	21:00	22:00					
19:30	20:30	21:30	22:30					
20:00	21:00	22:00	23:00					
20:30	21:30	22:30	23:30					
21:00	22:00	23:00	0:00					
21:30	22:30	23:30	0:30					
22:00	23:00	0:00	1:00					
22:30	23:30	0:30	1:30					
23:00	0:00	1:00	2:00					
23:30	0:30	1:30	2:30					
0:00	1:00	2:00	3:00					
0:30	1:30	2:30	3:30					
1:00	2:00	3:00	4:00					
1:30	2:30	3:30	4:30					
2:00	3:00	4:00	5:00					
2:30	3:30	4:30	5:30					
3:00	4:00	5:00	6:00					
3:30	4:30	5:30	6:30					
4:00	5:00	6:00	7:00					
4:30	5:30	6:30	7:30					
5:00	6:00	7:00	8:00					
5:30	6:30	7:30	8:30					
						Nom. Deadline @ 08:00 CCT		
6:00	7:00	8:00	9:00					
6:30	7:30	8:30	9:30					
7:00	8:00	9:00	10:00					
7:30	8:30	9:30	10:30					
8:00	9:00	10:00	11:00					
8:30	9:30	10:30	11:30		Posting of NBPR @ 10:30 CCT			
9:00	10:00	11:00	12:00		Contract Completed by 11:30 CCT			

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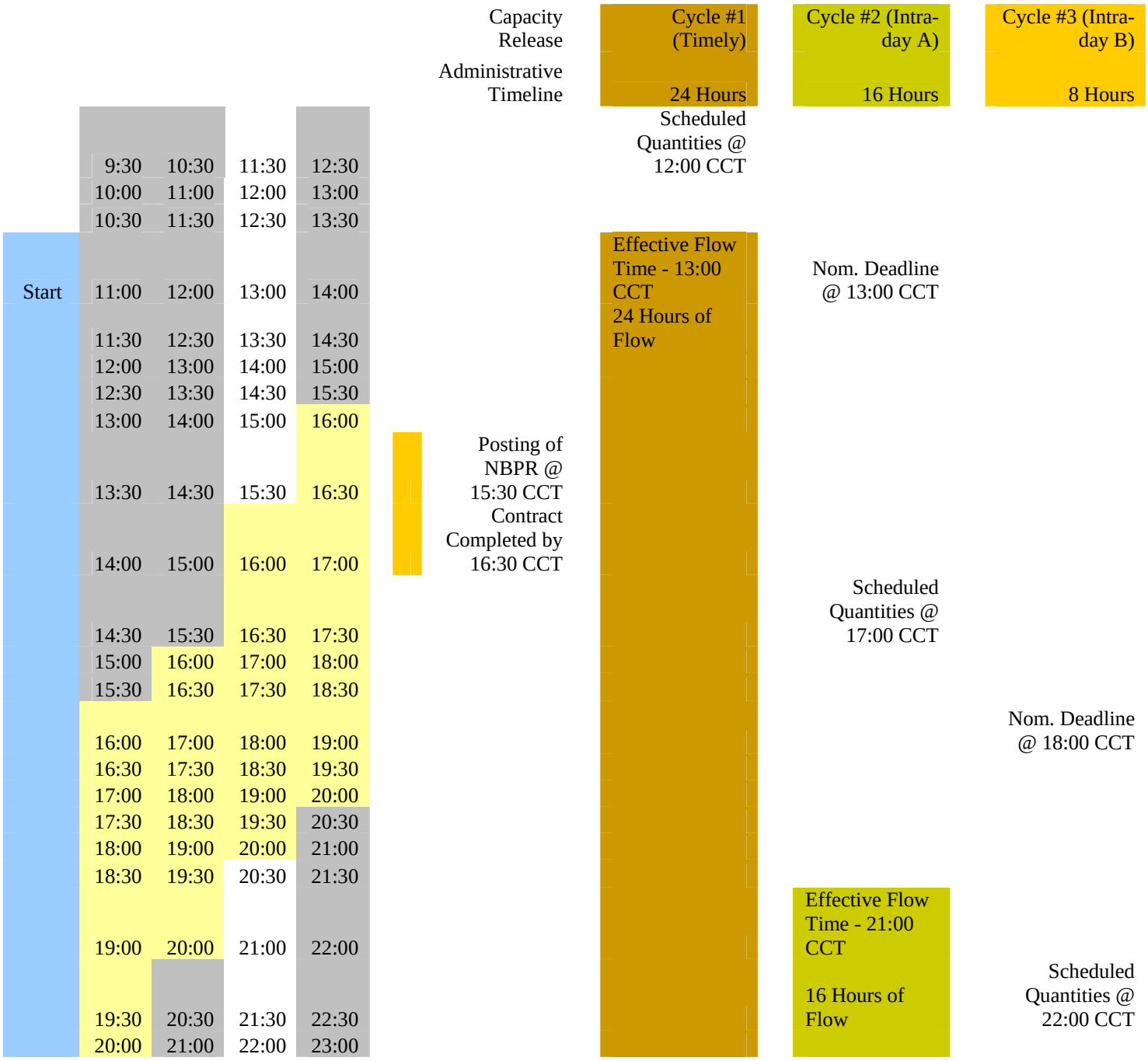
NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM NORTHERN BORDER PIPELINE

3 Cycle Scheduling Proposal **Draft - For Discussion Purposes**

Northern Border Pipeline



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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM NORTHERN BORDER PIPELINE

3 Cycle Scheduling Proposal **Draft - For Discussion Purposes**

Northern Border Pipeline

Capacity Release				Cycle #1 (Timely)	Cycle #2 (Intra-day A)	Cycle #3 (Intra-day B)
Administrative Timeline				24 Hours	16 Hours	8 Hours
	20:30	21:30	22:30	23:30			
	21:00	22:00	23:00	0:00			
	21:30	22:30	23:30	0:30			
	22:00	23:00	0:00	1:00			
	22:30	23:30	0:30	1:30			
	23:00	0:00	1:00	2:00			
	23:30	0:30	1:30	2:30			
	0:00	1:00	2:00	3:00			
	0:30	1:30	2:30	3:30			
	1:00	2:00	3:00	4:00			
	1:30	2:30	3:30	4:30			
	2:00	3:00	4:00	5:00			
	2:30	3:30	4:30	5:30			
							Effective Flow Time - 05:00 CCT
	3:00	4:00	5:00	6:00			8 Hours of Flow
	3:30	4:30	5:30	6:30			
	4:00	5:00	6:00	7:00			
	4:30	5:30	6:30	7:30			
	5:00	6:00	7:00	8:00			
	5:30	6:30	7:30	8:30			
	6:00	7:00	8:00	9:00			
	6:30	7:30	8:30	9:30			
	7:00	8:00	9:00	10:00			
	7:30	8:30	9:30	10:30			
	8:00	9:00	10:00	11:00			
	8:30	9:30	10:30	11:30			
	9:00	10:00	11:00	12:00			
	9:30	10:30	11:30	12:30			
	10:00	11:00	12:00	13:00			
End	10:30	11:30	12:30	13:30			

Peak Times Across North American Grid

BCR Biddable Capacity Release

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM NORTHERN BORDER PIPELINE

3 Cycle Scheduling Proposal **Draft - For Discussion Purposes**

Northern Border Pipeline

	Cycle #1 (Timely)	Cycle #2 (Intra-day A)	Cycle #3 (Intra-day B)
Capacity Release			
Administrative Timeline	24 Hours	16 Hours	8 Hours

NBPR Non-biddable Prearranged Release

See Separate Tab for Outline of Proposal Advantages

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM NORTHERN BORDER PIPELINE

Advantages Addresses a number of the timeline design considerations:

Gas day encompasses the two identified peak time periods

Cycle 1 nomination deadline eight hours before evening peak

Cycle 3 nomination deadline ten hours before morning peak

The three confirmation/scheduling processes occur between 8:00 am and 10:00 pm CCT with no overlap

Ten hour nomination staff window - Cycle 1 nomination deadline is 8:00 am CCT, Cycle 3 nomination deadline is 6:00 pm CCT

Primary deal making period for Cycle 1 would move from day ahead morning to day ahead afternoon

Four hours allotted to each confirmation/scheduling process

For a given gas day, there is one hour periods between each confirmation/scheduling process

Cycle 1 nomination through scheduling deadline occurs within the core business hours

Cycle 1 nomination deadline is well in advance of the electric day-ahead market

Although Cycle 1 gives pipelines only one hour to prepare system, pipelines could use what was nominated four hours before

to anticipate how to configure system

This approach eliminates the second full day scheduling opportunity

Flow times support reliability and safety

Simplifies gas day

All cycles for a given gas day occurs on the same calendar day

No overlapping processing times for cycles of two different gas days - easier to track balances (credit, OBA, PAL,…)

EPSQ calculations are simplified (full, 2/3, 1/3)

Electric generation markets are provided day of nomination opportunity

Works well with current standard administrative timeline for biddable capacity releases

Although not shown, recall and reput deadlines can be slotted in during business hours

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TRANSCANADA PIPELINES

Re: Wholesale Gas Quadrant, Business Practices Subcommittee – Nomination Timelines

Dear Ms. McQuade:

TransCanada PipeLines Limited Mainline System ("TransCanada") wishes to submit the following workpaper to NAESB for consideration in its Wholesale Gas Quadrant Business Practices Subcommittee discussions of the above referenced topic. Attached are slides, which include diagrams and tables for 2 models for consideration.

Before NAESB makes changes to the current nomination model (which includes nomination cycles and associated timelines), TransCanada encourages NAESB to take a step back and consider the following questions:

- o Does the current nominations model meet the needs of customers? What are the issues? Are any of the issues structural? What changes could be reasonably made?
- o What are the longer-term needs? What is the next logical step?
- o What criteria would be used to evaluate all models being considered?

From TransCanada's perspective, some issues with the current model include:

- o Nomination timelines are between 7 and 21.5 hours in advance of flow time for 3 of the 4 nomination cycles, which makes it difficult to forecast and nominate for volatile, unpredictable or weather sensitive loads.
- o The Timely and Evening cycles are duplicates. It is not efficient to consume a total of 9 hours of processing time for 1 flow time. Only 1 nomination cycle should be required for each flow time.
- o Overlapping cycles (e.g. processing Timely and Intraday 1 cycles during same period) adds complexity.

Given the above, changes, such as adding a cycle or two, and/or minor realignment of cycles, may not address the issues, or could perhaps add complexity and/or widen the business hours for scheduling for little benefit.

TransCanada has identified the following criteria for evaluating nomination models:

- o Reduce the time between nomination deadline and flow time to improve nominating efficiency and accuracy.
- o Simplify the structure of the model by minimizing overlap and eliminating duplicates.
- o Critical start of day and end of day nomination cycles are within or close to normal business hours across the grid.

TransCanada submits 2 models for discussion purposes:
Model 1: The gas day in this model would remain as is, and the timelines are restructured to address some of the issues.
Model 2: The gas day in this model would be modified to be 1500-1500 CCT. The rationale for selecting this gas day was to:

- o Start the gas day outside the morning and evening peak hourly gas deliveries;
- o Enable scheduling within or close to normal business hours; and
- o Enable effective beginning of day and end of day cycles.

TransCanada encourages NAESB to consider the concepts in these models and compare all models using a standard set of evaluation criteria.

Please post this letter and the attachment to the NAESB WGQ Business Practices Subcommittee webpage for the March 12 & 13, 2008 meeting.

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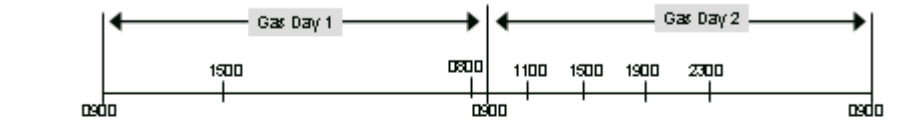
NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TRANSCANADA PIPELINES

Model 1 - Diagram



Gas Day 2 Flow Activity

Cycle 1	Nom Cycle	Flow
Cycle 2	Nom Cycle	Flow
Cycle 3	Nom Cycle	Flow
Cycle 4	Nom Cycle	Flow
Cycle 5	Nom Cycle	Flow

Gas Day 3 Flow Activity

Cycle 1	Nom Cycle

[Central Time]

TransCanada

Model 1 - Features

Cycle	Nom*	SQ*	Flow Time*
1	1500	1900	0900 next day
2	0730	1100	1100 same day
3	1130	1500	1500 same day
4	1530	1900	1900 same day
5	1930	2300	2300 same day

- Benefits:
  - 5 cycles (1 before Day; 4 intraday)
  - No duplicates (delete Timely cycle)
  - Reduced overlap
  - Some nominations are closer to flow time

* = Central Time

TransCanada

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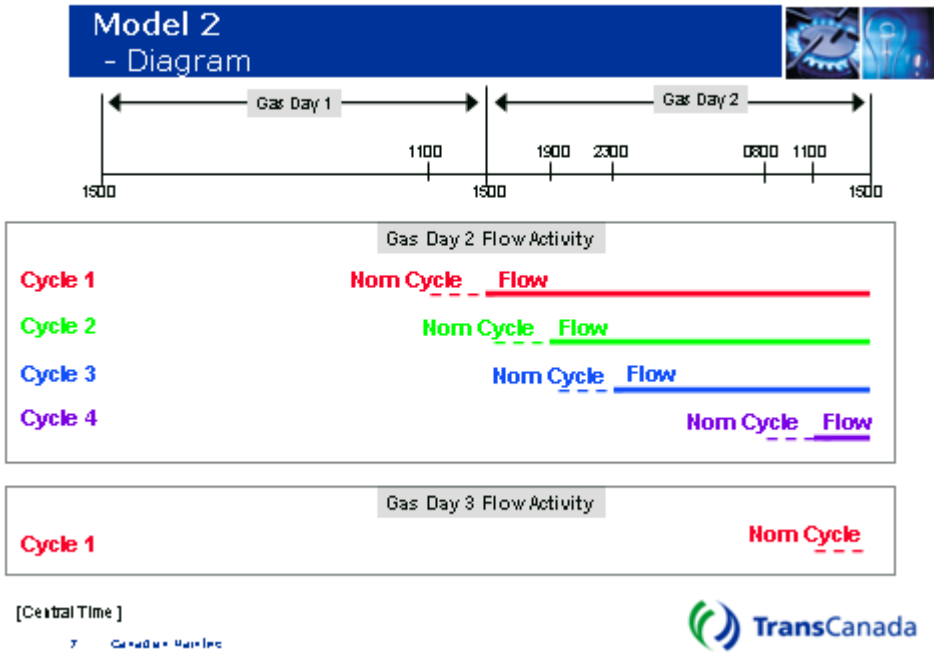
NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS PROPOSAL FROM TRANSCANADA PIPELINES



Model 2 - Features

Cycle	Nom*	SQ*	Flow Time*
1	1100	1500	1500 next day
2	1530	1900	1900 same day
3	1930	2300	2300 same day
4	0730	1100	1100 same day

Gas Day modified to 1500-1500

Benefits

- 4 cycles (1 start of day, 3 intraday)
- Start & end of day cycles more aligned with Business Hours
- Facilitates 'late in the Day' balancing
- Nominations closer to flow time
- No duplicates

* = Central Time

TransCanada

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS TIMELINE PROPOSAL FROM IROQUOIS GAS TRANSMISSION

Option 1 (all times in Central)

	First Cycle	Second Cycle	Third Cycle	Fourth Cycle
Cycle Type	Bumpable	Bumpable	Bumpable	Non-Bumpable
Gas Flow Hours	24	12	6	1
Deadlines (Electric)				
Day Ahead Market Scheduling	2 PM			
Electricity Flow	12 AM (midnight)			
Deadlines (Gas)				
Nomination	3 PM	7 AM	1 PM	7 PM
Confirmation	6 PM	10 AM	4 PM	10 PM
Scheduling	7 PM	11 AM	5 PM	11 PM
Gas Flow	12 AM (midnight)	12 PM (noon)	6 PM	11 PM
Biddable Capacity Release Transactions				
Biddable Capacity Release Offer	12:00 PM			
Capacity Release Bid Period Ends	1:00 PM			
Capacity Release Award if no match	2:00 PM			
Match Deadline	2:30 PM			
Capacity Release Award with Match	3:00 PM			
Recall/Reput Transactions		Note: Times occur on day prior to flow		
Releasing Shipper Recall Notice	10 AM	2 PM	8 AM	N/A
Reput	10 AM	2 PM	8 AM	N/A
Pipeline notifies of recall	11 AM	3 PM	9 AM	N/A
Non-Biddable Capacity Releases		Note: Times occur on day prior to flow		
Non-biddable offer posting	1 PM	5 PM	11 AM	5 PM
Non-biddable capacity release award, posting and contracting	2 PM	6 PM	12 PM	6 PM

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS TIMELINE PROPOSAL FROM IROQUOIS GAS TRANSMISSION

Option 2 (all times in Central)

	First Cycle	Second Cycle	Third Cycle	Fourth Cycle
Cycle Type	Bumpable	Bumpable	Bumpable	Non-Bumpable
Gas Flow Hours	24	16	12	6
Deadlines (Electric)				
Day Ahead Market Scheduling	2 PM			
Electricity Flow	5 AM			
Deadlines (Gas)				
Nomination	3 PM	7 AM	12 PM	6 PM
Confirmation	6 PM	10 AM	3 PM	9 PM
Scheduling	7 PM	11 AM	4 PM	10 PM
Gas Flow	5 AM	1 PM	5 PM	11 PM
Biddable Capacity Release Transactions				
Biddable Capacity Release Offer	12:00 PM			
Capacity Release Bid Period Ends	1:00 PM			
Capacity Release Award if no match	2:00 PM			
Match Deadline	2:30 PM			
Capacity Release Award with Match	3:00 PM			
Recall/Reput Transactions		Note: Times occur on day prior to flow		
Releasing Shipper Recall Notice	10 AM	2 PM	7 AM	N/A
Reput	10 AM	2 PM	7 AM	N/A
Pipeline notifies of recall	11 AM	3 PM	8 AM	N/A
Non-Biddable Capacity Releases		Note: Times occur on day prior to flow		
Non-biddable offer posting	1 PM	5 PM	10 AM	4 PM
Non-biddable capacity release award, posting and contracting	2 PM	6 PM	11 AM	5 PM

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Order 698 – Proposed Timeline presented by S. Tomalty, FPL Energy
Natural Gas Scheduling (Nomination) Timeline

GISB Standard/Tariff Reference; GISB Standard 1.3.2 (GISB is the forerunner of the NAESB Wholesale Gas Quadrant)

Nomination Cycle	Nomination Deadline	Confirmation Deadline	Scheduled Quantity Available By
Timely Cycle **9:00 a.m.**	**11:30 a.m.** (EDI 11:45 a.m.) the day before the gas flows	**3:30 p.m.** the day before the gas flows	**4:30 p.m.** the day before the gas flows
Evening Cycle **9:00 a.m.**	**6:00 p.m** (EDI 6:15 p.m.) the day before the gas flows	9:00 p.m. the day before the gas flows	**10:00 p.m.** the day before the gas flows
Intraday 1 Cycle **ID1 17:00 p.m.**	**10:00 a.m.** (EDI 10:15 a.m.) the day the gas flows	**1:00 p.m.** the day the gas flows	**2:00 p.m.** the day the gas flows
Intraday 2 Cycle **ID2 21:00 p.m.**	**5:00 p.m.** (EDI 5:15 p.m.) the day the gas flows	**8:00 p.m.** the day the gas flows	**9:00 p.m.** the day the gas flows
Intraday 3 Cycle **(6:00 a.m. flow)**	**3:00 a.m.** the day of gas flow	**5:00 a.m. the day of gas flow**	**6:00 a.m. the day of gas flow**
~~Hourly* Cycle **22:00 p.m. – 8:00 a.m.**~~	~~One hour before the effective time for the gas to flow.~~	~~All nominations must be submitted before the deadline.~~	~~As soon as the scheduling job is completed.~~

* Non–GISB Requirement

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS TIMELINE DESIGN ISSUES HIGHLIGHTED

Timeline Design Considerations

1. Ensure effective flow times accommodate peak times across the North American grid.
   a. 6:00 am-10:00 am local time zone (5:00 am-12:00 noon CCT)
   b. 4:00 pm-10:00 pm local time zone (3:00 pm-12:00 midnight CCT)
2. Ensure that Intraday cycles are as close (nomination deadline) to evening peaks as possible.
3. Ensure that Intraday cycles are as close (nomination deadline) to morning peaks as possible.
4. Nomination/scheduling timeline should be within business hours as much as possible.
   a. Nominators , confirming parties, schedulers, contracting and field personnel adjusting the flow
   b. Pipelines (7:00 am-10:00 pm CCT, seven-days-a-week) for nomination thru scheduling (would want to have someone available one hour before the day and an hour after the last scheduled quantity). Some pipelines may have nomination and scheduling personnel available via telephone twenty-four-hours-a-day, seven-days-a week. Some capacity release personnel (7:30 am-4:00 pm CCT, Monday-Friday)
   c. Producer/Marketer (7:00 am-5:00 pm CCT, Monday-Friday)
   d. LDCs - most follow the same Producer/Marketer (7:00 am-5:00 pm local time, Monday-Friday). Some follow Pipeline schedule.
   e. Electric Utility (twenty-four-hours-a-day, seven-days-a-week)
5. Attempt to maintain 4 hours between nomination deadlines and when scheduling quantities are issued.
6. For a given gas day there should be time between the end of the confirmation/scheduling process for one cycle and the nomination deadline for the next cycle.
7. To the extent possible, the nomination thru scheduling deadline for the Timely cycle should occur within the core business hours (generally 7:00 am-5:00 pm local time).
8. To the extent possible, the nomination thru scheduling deadline for the last Intraday cycle should occur within the core business hours (generally 7:00 am-5:00 pm local time).
9. Ensure that the close of the electric day-ahead market is at least one hour before the deadline of the Timely nomination cycle.
10. Provide adequate time to set-up the pipeline after the scheduling process is complete and before the gas flows for that cycle.
11. Provide the need for two opportunities for full day scheduling as is now provided in the current NAESB timeline by the timely and evening cycles.
12. Provide opportunities to minimize exposure to scheduling and imbalance penalties or quantities by providing adequate nomination cycles.
13. Provide an adequate number of bumpable cycles to allow firm shippers to maximize use of their pipeline capacity, while continuing to comply with the Commission's no bump policy.
14. Minimize impact to trading on the financial markets due to changes in the existing NAESB Nomination timeline or gas day.
15. Ensure flow times promote reliability and safety.
16. Accommodate capacity release timeline.

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Models:

- TVA/APS Model - (same gas day)
- Iroquois Model 1 - (midnight/midnight Central time)
- Iroquois Model 2 - (5 am/5 am Central time)
- Northern Border - (1 pm/1 pm Central time)
- El Paso Model 1 - (noon/noon Central time)
- El Paso Model 2 - (1 pm/1pm Central time)
- TransCanada Model 1 - (same gas day)
- TransCanada Model 2 - (3 pm/3 pm Central time)
- Pipeline Collaborative - (same gas day with morning cycle)
- Existing Model

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Criteria		APS TVA Apr 23	Iroquois 1	Iroquois 2	Northern Border	El Paso 12 PM	El Paso 1 PM	Trans Canada 1	Trans Canada 2	Pipeline Collaborative	Existing
		9:00 AM	12:00 AM	5:00 AM	1:00 PM	12:00 PM	1:00 PM	9:00 AM	3:00 PM	9:00 AM	9:00 AM
1	Flow times accommodate peak times	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	No	Yes	Disagree	No
2	ID cycles nomination deadlines are as close to evening peak as possible	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	No
3	ID cycles nomination deadlines are as close to morning peak as possible	No	No	No	No	No	No	No	No	No	No
4	Nom/scheduling timeline should be within business hrs as much as possible	No	No	No	Yes	Yes	Yes	No	No	No	Yes
5	Maintain 4 hrs between nom and scheduled quantities deadlines	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
6	Time between end of 1 cycle's confirm & sched process & next cycle's nom deadline	Yes	Yes	Yes	Yes	Yes	Yes	Disagree	Disagree	Yes	Yes
7	Timely cycle (nom through scheduling) process should occur within core business hrs (7 am - 5 pm local time)	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
8	Last ID cycle (nom through scheduling) process should occur within business hrs (7 am - 5 pm local time)	No	No	No	No	No	No	No	Yes	No	No

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Criteria		APS TVA Apr 23	Iroquois 1	Iroquois 2	Northern Border	El Paso 12 PM	El Paso 1 PM	Trans Canada 1	Trans Canada 2	Pipeline Collaborative	Existing
		9:00 AM	12:00 AM	5:00 AM	1:00 PM	12:00 PM	1:00 PM	9:00 AM	3:00 PM	9:00 AM	9:00 AM
9	Close of electric day-ahead market is at least 1 hr before Timely nom deadline	No	No	No	No	No	No	No	No	No	No
10	Adequate time for pipes to set up between end of scheduling process & gas flow time	Yes	Yes	Yes	Disagree	Yes	Yes	Disagree	Disagree	Yes	Yes
11	2 opportunities for full day scheduling as provided in existing Timely & Eve cycles	Yes	No	No	No	Yes	Yes	No	No	Yes	Yes
12	Opportunities to minimize scheduling & imbalance penalties w/ adequate nom cycles	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree
13	Adequate # of bumpable cycles to maximize firm capacity	Yes	Yes	Yes	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree
14	Minimize impact to trading on financial markets	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes
15	Flow times promote reliability & safety	Disagree	No	No	Disagree	Disagree	Disagree	Disagree	Disagree	No	Disagree
16	Opportunities for operationally feasible non-bumpable late day noms	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree
17	Accommodate capacity release timeline	No	Uncertain	Uncertain	No	No	Uncertain	Uncertain	Uncertain	Yes	Yes
Number of "YES" Indicators		8	5	5	5	7	7	3	5	8	8

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NAESB ORDER NO. 698 – (7C) INTRADAY NOMINATIONS TIMELINE PROPOSALS STRAW VOTES BALANCED VOTE LEGEND FOR BALANCED STRAW VOTE: GREEN – PASSED, YELLOW– FAILED, BLUE - WITHDRAWN

APS/TVA - April 23 Model

PASSED

Segment	Votes Cast			Balanced Vote		
	YES	NO	TOTAL	YES	NO	TOTAL
End Users	8	0	8	2	0	2
LDCs	5	4	9	1.111111	0.888889	2
Pipeline	1	13	14	0.142857	1.857143	2
Producer	0	6	6	0	2	2
Services	2	0	2	2	0	2
Total	16	23	39	5.253968	4.746032	10

Iroquois 1 Model

FAILED

Segment	Votes Cast			Balanced Vote		
	YES	NO	TOTAL	YES	NO	TOTAL
End Users	0	8	8	0	2	2
LDCs	0	9	9	0	2	2
Pipeline	0	13	13	0	2	2
Producer	0	6	6	0	2	2
Services	0	2	2	0	2	2
Total	0	38	38	0	10	10

Iroquois 2 Model

FAILED

Segment	Votes Cast			Balanced Vote		
	YES	NO	TOTAL	YES	NO	TOTAL
End Users	0	8	8	0	2	2
LDCs	1	8	9	0.222222	1.777778	2
Pipeline	0	13	13	0	2	2
Producer	0	6	6	0	2	2
Services	0	2	2	0	2	2
Total	1	37	38	0.222222	9.777778	10

Northern Border Model

FAILED

Segment	Votes Cast			Balanced Vote		
	YES	NO	TOTAL	YES	NO	TOTAL
End Users	0	8	8	0	2	2
LDCs		9	9	0	2	2
Pipeline	2	13	15	0.266667	1.733333	2
Producer		6	6	0	2	2
Services		2	2	0	2	2
Total	2	38	40	0.266667	9.733333	10

El Paso 12 PM Model

WITHDRAWN

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El Paso 1 PM Model							
FAILED	Segment	Votes Cast			Balanced Vote		
		YES	NO	TOTAL	YES	NO	TOTAL
	End Users	1	8	9	0.222222	1.777778	2
	LDCs	1	8	9	0.222222	1.777778	2
	Pipeline	7	9	16	0.875	1.125	2
	Producer	0	6	6	0	2	2
	Services	0	1	1	0	1	1
	Total	9	32	41	1.319444	7.680556	9

TransCanada 1 Model							
FAILED	Segment	Votes Cast			Balanced Vote		
		YES	NO	TOTAL	YES	NO	TOTAL
	End Users	0	9	9	0	2	2
	LDCs	0	9	9	0	2	2
	Pipeline	2	13	15	0.266667	1.733333	2
	Producer	0	6	6	0	2	2
	Services	0	1	1	0	1	1
	Total	2	38	40	0.266667	8.733333	9

TransCanada 2 Model							
FAILED	Segment	Votes Cast			Balanced Vote		
		YES	NO	TOTAL	YES	NO	TOTAL
	End Users	0	9	9	0	2	2
	LDCs	2	7	9	0.444444	1.555556	2
	Pipeline	3	12	15	0.4	1.6	2
	Producer	0	6	6	0	2	2
	Services	0	1	1	0	1	1
	Total	5	35	40	0.844444	8.155556	9

Pipeline Collaborative Model							
FAILED	Segment	Votes Cast			Balanced Vote		
		YES	NO	TOTAL	YES	NO	TOTAL
	End Users	4	5	9	0.888889	1.111111	2
	LDCs	4	5	9	0.888889	1.111111	2
	Pipeline	12	4	16	1.5	0.5	2
	Producer	0	6	6	0	2	2
	Services	1	0	1	1	0	1
	Total	21	20	41	4.277778	4.722222	9

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FPL Energy Model

PASSED

Segment	Votes Cast			Balanced Vote		
	YES	NO	TOTAL	YES	NO	TOTAL
End Users	3	5	8	0.75	1.25	2
LDCs	4	4	8	1	1	2
Pipeline	3	9	12	0.5	1.5	2
Producer	6	0	6	2	0	2
Services	1	0	1	1	0	1
Total	17	18	35	5.25	3.75	9

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NAESB UPDATE: ETARIFF SUMMARY
AS OF APRIL 29, 2008

E-TARIFF STANDARDS DEVELOPMENT – ASSIGNED TO WHOLESALE GAS AND WHOLESALE ELECTRIC:

- **eTariff (WEQ and WGQ):** The initial meeting was held on February 1, 2006 at the FERC, opened by Chairman Kelliher. Proposals from INGAA, EEI, AOPL and Texas Intrastate Association were given, along with a review by FERC staff of requirements to be met for an e-Tariff program. Since that initial meeting, several others have been held and a consensus has been reached for building to support a web portal option for electronically filing tariffs. While the original completion date was schedule for year-end 2007 to be out of committee, it has since been revised to first quarter 2008.

MEETING SUMMARY:

- **February 1, 2006 :** A meeting was held at the FERC, opened by Chairman Kelliher. Proposals from INGAA, EEI, AOPL and Texas Intrastate Association were given, along with a review by FERC staff of requirements to be met for an e-Tariff program.
- **March 13, 2007:** A meeting was held at NAESB offices, chaired by Keith Sappenfield and Jane Daly. The FERC staff further delineated their requirements and answered questions from EEI and INGAA. The group began drafting standards.
- **April 26, 2007:** The e-Tariff Subcommittee met in Washington DC hosted by AGA. During this meeting, FERC Staff reviewed their work paper Filing Field Data Example Submitted by FERC Staff and answered questions on what data will be required for submittal of electronic tariff and related documents. The pipeline segment also presented their proposed approach regarding development of e-Tariff standards. After further discussion, it was determined that the e-Tariff Subcommittee needed to schedule a conference call prior to the June 4 meeting to determine what approach the NAESB e-Tariff standards will take.
- **May 21, 2007:** The e-Tariff Subcommittee met via conference call for a one-topic agenda – to determine the approach the NAESB e-Tariff standards will take. During the conference call, there was a unanimous decision to support the modified web portal approach.
- **June 4, 2007:** The group met in Phoenix, Arizona on June 4 hosted by Arizona Public Service. During this meeting, FERC Staff reviewed the individual data elements that would be required for e-Tariff filings. During this meeting, a motion was made to take a non-binding straw vote to move forward with the document submitted by FERC staff that contained the required data elements. A motion was made to defer the first motion. The motion to defer passed the WEQ, but failed the WGQ.
- **July 10, 2007:** The e-Tariff Subcommittee met via conference call to adopt the minutes from the April 26, May 21, and June 4 meetings. The agenda for the July 27 meeting was also discussed during this call.
- **July 27, 2007:** The e-Tariff Subcommittee met in Washington, DC hosted by EEI. During this meeting, the e-Tariff Subcommittee voted to create an e-Tariff Technical Task Force; reviewed Draft Electronic Tariff Data Elements and Descriptions that will be forwarded to the e-Tariff Technical Task Force; and adopted a motion to take a straw poll that the e-Tariff Subcommittee is going to work on option A – the web portal option for e-Tariff submittals. The Draft Electronic Tariff Data Elements and Descriptions document will be used by the e-Tariff Technical Task Force for development of the xml schema that will be created in conjunction with the e-Tariff business practice standards.

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NAESB UPDATE: ETARIFF SUMMARY
AS OF APRIL 29, 2008

- **August 20, 2007:** The e-Tariff Subcommittee met via conference call on August 20, 2007 from 12:00 PM to 4:00 PM Central. The agenda for this call was a single topic agenda to cover several items that were raised during the discussion of the metadata prior to the technical task force meeting on August 23-24. Additional discussion is needed to determine the definition and specifics for the metadata data elements: Line 8 – Database Identifier; Line 20 – Associated Filing; Line 30 – Document Security Level; Line 37 – Tariff Record Title; Line 38 – Tariff Record Number; Line 39 – Tariff Record Collation Value and Line 41 - Tariff Record Parent or Container Identifier.
- **August 23-24, 2007:** The first meeting of the e-Tariff Technical Task Force met on August 23-24, 2007 in Washington, DC hosted by FERC. During this meeting, FERC's contractor gave the Task Force an overview of the FERC Backend system processing of e-Tariff XML data, explained that the XML was chosen solely because it is in widespread use and emphasized that XML will be used solely to file documents at FERC, not to communicate between anyone else and needs no field for future expanded uses. The Task Force reviewed FERC's and WGQ's pipeline segment XML strawmen; and commenced severe shortening of the pipeline segment's XML strawman, chosen as best of breed. Mr. Brooks, ISO New England is co-chair of the e-Tariff Technical Task Force for the WEQ and Mr. Burden, Williams Gas Pipeline is co-chair of the e-Tariff Technical Task Force for the WGQ.
- **September 13-14, 2007:** The e-Tariff Technical Task Force met on September 13-14 in Houston at the NAESB offices to complete development of the XML schema. During this meeting, Mr. Kravis provided a presentation on options for binary formats. The group conducted a status update of issues/action items and reviewed open issues and progress since the August 23-24 meeting. The group created a list of all filing types for the three industries – gas, oil, and electric and discussed enhancements to the XML schema, and determined that use cases would need to be developed for each industry.
- **October 11-12, 2007:** The e-Tariff Subcommittee met in Houston hosted by NAESB. During this meeting, the subcommittee received an update from the e-Tariff Technical Task Force, discussed and approved the e-Tariff Task Force proposal for element names with only a few modifications made, and discussed the open issues identified by the e-Tariff Technical Task Force. During this meeting it was determined that the e-Tariff Technical Task Force would need additional time to complete XML schema, the use cases, and the technical implementation business process document as it could not be completed by the end of 2007. It was determined that the e-Tariff Subcommittee would meet in January 2008 to review the progress of the e-Tariff Technical Task Force and then meet in February 2008 to vote on the standards package.
- **October 16, 2007:** The NAESB office informed the FERC that the eTariff subcommittee would not be complete with its work by year-end, and that the group expected that February 2008 was the new target date for completion. All needed steps would be taken to ensure that the eTariff project would receive the needed priority.
- **October 22-23, 2007:** The e-Tariff Technical Task Force met on October 22-23 in Holyoke, Massachusetts hosted by ISO New England. During this meeting, the e-Tariff Technical Task Force reviewed the actions taken by the e-Tariff Subcommittee during the October 11-12 meeting, continued to discuss and modify the XML schema, made assignments for creation of use cases for all three industries and different filing types for each industry, and made assignments for the technical sections of the Technical Implementation Business Process (TIBP).
- **November 28-30, 2007:** The e-Tariff Technical Task Force met on November 28-30 in Phoenix, Arizona, hosted by Arizona Public Service. During this meeting, the Task Force reviewed and corrected technical descriptions of the Draft TIBP, which includes the XML schema, the CSV format requirements, use cases, data tables, code values, reference tables, technical specifications of web portal and layman's explanation of each of

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the foregoing. At the conclusion of the meetings, the leadership was approached and it was determined that the group is progressing as planned towards a February 2008 date.

- **December 10, 2007:** The e-Tariff Technical Task Force met via conference call to review the FERC data tables and then take a vote on the entire TIBP.
- **January 8, 2008:** The e-Tariff Task Force met via conference call during the first week of January 2008 with the e-Tariff Subcommittee to explain its corrections to the technical descriptions, as well as its views on a few remaining combined technical/business issues.
- **January 23-25, 2008:** The e-Tariff Subcommittee met January 23-25, 2008 in Colorado Springs, Colorado hosed by El Paso. During this meeting, it is planned for the e-Tariff Subcommittee to vote out the recommendation of the standards for e-Tariff to the WGQ and WEQ Executive Committees.
- **February 27, 2008:** The comment period ended on February 27 for the recommended standards for eTariff. Eight sets of comments were received plus a set of chairs' comments that highlighted frequently asked questions.
- **February 29, 2008:** The ECs voted on February 29, 2008 with notational ballots due on March 4, 2008 for absent EC members, to approve the recommendation, passing each EC with the needed super-majority thresholds of 67% from each quadrant (WEQ – 83% , WGQ – 84%), and a minimum of 40% affirmative votes from each segment. No negative votes were received. Several EC members either abstained or failed to provide a ballot. T
- **April 4, 2008:** The WGQ and WEQ membership was forwarded the recommended standards approved by the ECs. They were ratified by each quadrant on April 4, 2008 after a thirty day ratification period, garnering the super-majority threshold of 67% from each quadrant (WEQ – 97%, WGQ -100%).
- **April 15, 2008:** The NAESB office forwarded a progress NAESB Report to the FERC including the record of standards development for the eTariff project.
- **April 17, 2008:** The FERC issued a Notice of Proposed Rule-making regarding the standards forwarded to them on April 15 with a 30-day comment period after publication in the Federal Register. The FERC in the NOPr proposes to revise its previous Notice of Proposed Rulemaking for electronic tariff filing. The revised proposal would require that all tariffs and tariff revisions and rate change applications for the public utility, natural gas pipeline, and oil pipeline industries be filed electronically according to a set of standards developed in conjunction with the North American Energy Standards Board. These standards will enable the Commission to develop a tariff database for use by the Commission staff, the industry, and the public to view and research tariffs, and also provides companies the flexibility to design or purchase software for making tariff filings that best fits their business needs. Upon the effective date of a final rule in this proceeding, the Commission will no longer accept tariff filings submitted in paper format.
- **April 29, 2008:** The NOPR appeared in the Federal Register beginning the clock for industry comment to the FERC.

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NAESB UPDATE: ETARIFF DISTRIBUTION LIST

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Ackerman, Eric	Edison Electric Institute
Ackerman, Jeffrey	WAPA
Alcombright, Jim	New York ISO
Alletzhauser, Bill	Qualedi
Alvarez, Marianne	Exelon Corporation
Anderson, Brenda	Bonneville Power Administration
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Anderson, Patricia	ONEOK Partners GP LLC
Anthony, Mike	Progress Energy Carolinas, Inc
Apperson, John	PacifiCorp Energy
Aria, Lora Herff	E.ON U.S. LLC
Arnaout, Mariam	American Gas Association
Babik, Jalal	Dominion
Ball, William	Southern Company
Balu, Neal	WPS Resources
Barnes, Lisa	Westar Energy Inc.
Barracchini, Tony	FERC
Barry, Patrick	Northern Natural Gas Company
Bartholomot, Henri	Edison Electric Institute
Baskin, Lee	Kinder Morgan Texas Intrastate Pipeline Group
Bayer, Janet	National Fuel
Beer, Michael S	E.ON U.S. LLC
Benham, Bill	BP Energy
Bennett, Joletta	Shell Pipeline Company LP
Bennett, Mark	Electric Power Supply Association
Bernard, Chris	Edison Mission
Berwager, Sydney	Bonneville Power Administration
Black, Shannon	SMUD
Bomar, Anne	Dominion
Boston, Terry	Tennessee Valley Authority
Boswell, William	NAESB General Counsel
Bourbonnais, William	WPS Resources
Bourg, Naomi	Northern Natural Gas Company
Bradford, Louise	Trunkline Gas Company
Bretz, John	Anadarko
Brooks, Dick	ISO New England, Inc.
Brosnan, Mary	NiSource Gas Transmission and Storage Group
Brown, Kenneth	Public Service Electric & Gas Corp.
Brown, Richard	Exelon Corporation
Buccigross, Jim	Group 8760
Burch, Kathryn	Spectra Energy
Burden, Christopher	Williams Gas Pipeline
Burgess, Thomas C.	FirstEnergy Services Company
Burke, Oliver	Entergy
Burks, J. Cade	EC Power
Burnett, Tina	Boeing
Busch, Jim	BP Energy
Butler, Scott	Consolidated Edison Company of NY
Cadenhead, Roy	Enbridge
Calcagno, Suzanne	UBS Energy LLC
Camardello, Marg	Transco-Williams
Campbell, Linda	FRCC
Carriere, Jay	MidAmerican Energy Holdings Company
Carroll, MaryBeth	KeySpan
Castronovo, Amy	Enbridge Energy Company Inc.
Cauley, Gerry	NERC
Chapman, Adrian	Washington Gas
Chezar, Dolores	KeySpan
Choate, Cort	Representing FirstEnergy
Ciza, John	Southern Company
Clarke, Breanne	El Paso Corporation - Western Pipelines
Cleveland, Ralph	AGL Resources
Clore, Sally L.	Midwest ISO
Cobb, Antoine	Arizona Public Service Company
Cobb, Steven	Salt River Project
Coleman, Betty	Xcel Energy Services, Inc.
Coleman, Charles	FERC
Collins, Mary Anne	Chevron Pipeline Company
Colombo, Craig	Dominion
Comer, Edward	Edison Electric Institute
Connelly, David Martin	Bruder, Gentile & Marcoux, L.L.P.
Cook, Adrianne	Assoc. of Oil Pipe Lines
Cook, Chuck	Chevron/Texaco
Cook, David	NERC
Corse, Scott	Village of Morrisville Water & Light Department
Cowan, Rich	TransCanada
Cox, Patty	CenterPoint Energy
Crabtree, David	Tampa Electric Company
Crockett, Valerie	Tennessee Valley Authority
Cutting, John C.	NYISO
Daley, Kate	INGAA
Daly, Jane	Arizona Public Service Company
Daly, Kelly	Stinson Morrison Hecker
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Derricks, Dennis	Wisconsin Public Service Corporation
Desselle, Michael	Southwest Power Pool
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Guthrie, Carol	ChevronTexaco
Gwilliam, Tom	Iroquois Gas Transmission System
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Halpin, Francis	Bonneville Power Administration
Hamilton, Maurene	Sea Robin
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Hartsoe, Joseph	AEP
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Heckerman, Bambi	Northern Border
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McCawley, John	Peco Energy Company
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McGovern, Patrick	Georgia Transmission Corporation
McKee, Bob	American Transmission Company
McKeever, Deborah	TXU Electric Delivery
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Mihalik, Dan	Assoc. of Oil Pipe Lines
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Mills, Pamela	San Diego Gas & Electric/ SoCalGas
Minneman, James	PPL Solutions
Mirr, Katy	Sempra Global
Mitchell, Mark	Salt River Project
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Ogenyi, Gloria	Conectiv
Olsen, Greg	Ontario Power Generation
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Phillips, Dana	American Electric Power
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Pierce, Mark	Spectra Energy
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Potter, Rob	Portland General Electric Company
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Pritchard, Alan	Duke Energy Corporation
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Purtee, Jeffrey	Sierra Pacific Resources
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Ralph, Robbie	Shell Pipeline Company
Raup, Christopher	Consolidated Edison of New York, Inc.
Reed, Bruce	BP Energy
Rehman, Barbara	Bonneville Power Administration
Reilley, Robert	Coral Power LLC
Reitz, Dave	National Fuel Gas Supply
Rhyno, Wendy	Alliance Pipeline Ltd.
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Rogers, Jan	Chevron
Rosenberg, Marv	Independent
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Rudd, Doug	New Jersey Natural Gas Company
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Schwermann, Robert	SMUD
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Severance, Charles	Wisconsin Public Service Corporation
Shafer, Rueben	DataNet, Inc.
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Sharp, Korin	DTE Energy
Sharp, Toni	Kern River
Shepard, Mike	Mewbourne Oil Company
Simpkins, Lisa	Constellation
Simpson, Denise	Ameren
Skiba, Ed	Midwest ISO
Smead, Rick	Navigant Consulting
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Spangler, Leigh	Latitude Technologies
Steffes, Darla	Northern Border
Stender, Mike	El Paso Corporation
Stepenovitch, Joe	Independent
Stewart, Cindy E.	FirstEnergy Service Company
Stewart, Lee	Southern California Gas Company
Stires, Susan	El Paso Natural Gas
Straquadine, Tony	Alliance Pipeline Ltd.
Stroh, Robert	Bruder, Gentile & Marcoux, L.L.P.
Sumter, Gail	Assoc. of Oil Pipe Lines
Sutton, Dawn	Progress Energy Service Co., LLC
Swamy, Priya	Dominion Transmission Inc.
Taylor, Darren	Calpine Corporation
Taylor, Lynn	CenterPoint Energy
Templeton, Jim	Comprehensive Energy
Theodore, Sharon Royka	NiSource
Tholt, Jane	TransCanada
Thomason, Angela	NAESB
Thomason, Veronica	NAESB
Thompson, Cindy	Southern Star Central Gas Pipeline
Thompson, Tim	Southern Star Central Gas Pipeline
Thorn, Michael J.	FirstEnergy Service Company
Thornton, Belinda	Tennessee Valley Authority
Thornton, Kathy	Enbridge Offshore
Thrash, MiYung	Shell Pipeline Company LP
Tiggelaar, Keith	Williston Basin Interstate Pipeline Company
Tigue, John R.	NYSEG
Tilghman, Henry	PacifiCorp
True, Roy	ACES Power
Ulch, Dean	Southern Company
Van Ness, Jana	Arizona Public Service Company
Van Pelt, Kim	Panhandle Eastern Pipe Line
Vandervort, Thomas	NERC
VanGordon, Michelle L.	Midwest ISO
Vaughn, C. Mark	NiSource Pipeline
Vicente, Denny	BP Pipelines
Voeck, Julie	American Transmission Company
Warr, Martin	BP Energy
Weathers, Wendy	Salt River Project
Weaver, Alonzo	Memphis Light Gas and Water
Wei, Karen	The Structure Group
Westendorff, Julie B.	Edison Electric Institute
Westerfield, Lou Ann	Idaho Public Utility Commission
White, Craig	Philadelphia Gas Works
Whiting, Luke	Florida Power and Light
Wiley, Ken	FRCC
Williams, Robert C. (Bob)	Florida Municipal Power Agency
Willis, Joe	Magellan Pipeline Company
Willis, Michelle	CenterPoint
Williston, Wade	Entergy
Winterfeld, Curtis	Deseret Generation & Transmission Cooperative
Yakopcic, George	Allegheny Energy
Yang, Aiwei	Northern Natural Gas Company
Yeung, Charles	Southwest Power Pool
Yip, Nelson	Consolidated Edison
York, Katherine	Tennessee Valley Authority
Young, Randy	Gulf South Pipeline Company LP
Younglund, Marshia	Williams
Yount, Sheila	TransCanada
Zeiszler, Don	Williston Basin Interstate Pipeline Company
Zelenko, Richard	Dominion Retail Inc.
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NAESB UPDATE: ETARIFF RECOMMENDATION

STANDARDS LANGUAGE:

D1 Tariff Submitter is the term used to describe any entity that is required to submit a Tariff Filing.

D2 Tariff Filing is the term used to describe a compilation of all document(s), associated data and supporting documents that is required to be filed electronically by a Tariff Submitter pursuant to Title 18 Code of Federal Regulations Parts 35, 154, 284, 300, 341 or other Parts as required by the Federal Energy Regulatory Commission.

D3 Tariff Record is the term used to describe the part of a Tariff Filing that consists of the data elements that relate to a sheet, section or entire tariff, rate schedule, or service agreement that is required to be filed with the Federal Energy Regulatory Commission.

D4 Sheet-Based Format and Section-Based Format are the terms used to describe the subdivision into sheets or sections, respectively, of a tariff, rate schedule, or service agreement for purposes of a Tariff Filing.

D5 Whole Document Format is the term used to describe a tariff, rate schedule, or service agreement submitted as a single document within a Tariff Record for purposes of a Tariff Filing.

S1 A Tariff Submitter should electronically submit a Tariff Filing pursuant to the requirements as set forth in NAESB WGQ Standard [x.4.z] / NAESB WEQ Standard [X].

S2 For the electronic submission of a Tariff Filing, a tariff, rate schedule, or service agreement, and changes thereto, should be structured using one or more of the following methods:

i. Sheet-Based Format,
ii. Section-Based Format, or
iii. Whole Document Format.

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Executive Summary

This implementation guide is for use by entities required to submit tariffs, rate schedules, and service agreements together with supporting documentation to the Federal Energy Regulatory Commission (FERC) pursuant to Title 18 Code of Federal Regulations Parts 35, 154, 284, 300, 341 or other Parts as required by FERC. Filings which historically were submitted in hard copy should be submitted electronically according to the guidelines contained herein. To accomplish this, the components of the previous filings will need to be separated into various pieces of identifying information as defined by the data elements contained herein. These data elements and their accompanying data, are hierarchically organized by the XML schema and when compiled constitute an XML filing package for an electronic Tariff Filing. The XML filing package is then uploaded through a web portal. The following is a guide describing the various processes/mechanisms, data tables, code values/reference tables, and technical specifications used in the submission of such Tariff Filings.

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Chair's Comments on the
eTariff Subcommittee Recommendation to the
WEQ and WGQ Executive Committees

During the NAESB eTariff Subcommittee's (SC) development of the recommended eTariff Definitions, Standards and Implementation Guide dated January 25, 2008, many participants in the SC meetings and eTariff Technical Task Force discussed several concerns and issues that they believe need to be addressed prior to the Federal Energy Regulatory Commission's ("Commission") implementation of the Definitions, Standards and Implementation Guide. The Definitions, Standards and Implementation Guide are limited in scope to the issue of how Tariff Filings will be submitted to FERC and do not govern or guide many aspects of the Tariff Filing process or requirements. That is, the Definitions, Standards and Implementation Guide, only when coupled with guidance materials that will need to be issued by FERC (including a Final Rule), would provide the full set of information needed to make a Tariff Filing correctly. These Comments reflect the joint concerns and issues that the WEQ and WEG felt should be included in NAESB's filing that is submitted to the Commission as part of the record for the NAESB eTariff Definitions, Standards and Implementation Guide, but were not within the scope of the NAESB process.

Participants also believe that resolution of most, if not all, of the concerns and issues should be completed prior to the time a Tariff Submitter develops its internal or external systems to submit their Tariff Filing to the Commission's website portal. SC and eTariff Technical Task Force participants included key members of the Commission Staff who indicated that, under a new rulemaking, Commission would seek comments on both the NAESB eTariff Definitions, Standards, Implementation Guide and other industry comments filed as part of the NAESB eTariff record as well as address the many issues and concerns relating to Tariff Filings that were not within the scope of the NAESB process.

During the SC meeting of January 25, 2008, the issues and concerns identified below were among those discussed during the SC's review of the eTariff Implementation Guide's Frequently Asked Questions (FAQ) that were determined to be outside the scope of the NAESB process and thus would need to be addressed in the rulemaking and/or the guidance documentation that FERC will need to provide. Several FAQs were revised and retained in the eTariff Implementation Guide since they were within the scope of the NAESB process. The DRAFT Responses below are suggested answers to the questions based on the participant's understandings of past Commission action on similar matters and discussions with Staff.

Frequently Asked Questions
General Questions:

Question: What will be the resolution process if there is a disagreement between the Commission's eTariff database/public viewer and the Tariff Submitter's database?

Response: The clean copy posted on eLibrary is and will be the official copy of all or part of a tariff, rate schedules, or service agreements on file with the Commission. Discrepancies between the posted version and any version in the possession of the Tariff Submitter would be resolved in the same manner as prior to eTariff.

Question: What procedure will there be for the filing of Tariff Filing-related motions, rehearing, and protests?

Response: eFiling should be used for the filing of any documents that do not constitute Tariff Filings. Other than a motion to suspend a tariff in effect or move a suspended tariff into effect, the listed types of documents are not Tariff Filings, they merely relate to a Tariff Filing. A Tariff Filing typically results in a change to the text or status of a tariff, rate schedule, or service agreements.

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Question: What about settlements? Settlements often include proposed changes to tariff, rate schedules, or service agreements.

Response: Settlements containing such proposed changes can be eFiled and when ruled upon by the Commission (accepted, rejected, or accepted with modification), the relevant Tariff Records can then be submitted as a compliance filing.

Question: Some Tariff Submitters, only have NGA Section 5 or FPA 206 rights to change a tariff, rate schedules, or service agreement. That is, the tariff Submitter may not file to change the document unilaterally. Today, the Tariff Submitter would file a complaint, using its Section 5 or 206 rights and might include the proposed changed sheets. How should such filings be made in the future?

Response: The Tariff Submitter should eFile a Complaint and not change its Tariff Records until Commission rules on the complaint that the change is accepted.

Question: A Tariff Submitter is making a change to an electric industry tariff, rate schedule, or service agreement that has never been filed pursuant to Order No. 614, how does a Tariff Submitter do this?

Response: File the updated tariff, rate schedule, or service agreement in its entirety using one of the three formats for the Tariff Records. In accordance with Order No. 614, or a superseding order, consolidate any existing supplements/amendments such that the Tariff Records contain only the current terms and conditions. As is the case today, a waiver of the redline may be requested.

Question: A current tariff, rate schedule, or service agreements has a Table of Contents with page numbers as part of the tariff, rate schedule, or services agreement, but the Tariff Records in eTariff will not necessarily have any page numbering, how should this issue be addressed?

Response: A Tariff Submitter may delete the page numbers in the Tariff Record(s) containing the Table of Contents. Thus, the Table of Contents simply would provide the reader the order of the sections of the document. If you choose to include page numbers in the text of the tariff, rate schedule, or service agreement, the eLibrary posted version of the tariff, rate schedule, or service agreement, should include page numbers in a header or footer.

Data Element-Specific Questions

Question: How should a Tariff Submitter select a Tariff Title?

Response: A logical Tariff Title depends on how many and which tariffs, rate schedules, or service agreements will be contained in an eTariff database.

Question: What are the typical situations in which there will be an Associated Filing?

Response: A compliance filing, other than a compliance filing driven by a Commission-initiated rulemaking or a complaint, nearly always has an Associated Filing. A withdrawal filing nearly always, if not always, has an Associated Filing.

Question: How far apart should Record Collation Values be?

Response: It is suggested in the Implementation Guide that the collation values be incremented at 1000. But, the Tariff submitter should make this determination in consideration of such factors: how many tariff, rate schedules, or service agreements will eventually be in a database, whether such tariffs, rate schedules, or service agreements will be Section-Based Format, Sheet-Based Format, or Whole Document Format and if tariff, rate schedules, or service agreements are Section or Sheet-Based Format how likely will be the need to add new Sheets or Sections in between existing ones.

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Question: A Tariff Submitter is submitting an OATT and it is based on Commission's Pro Forma OATT, should a Tariff Submitter use Record Change Type "Pro Forma"?

Response: No. The Record Change Type "Pro Forma" has nothing to do with the pro forma OATT or other pro forma service agreements used by various Tariff Submitters. At this time the Record Change Type "Pro Forma" is limited to use by interstate natural gas companies.

How to Effectuate Certain Types of Filing

A presentation by National Grid on 1-25-2008 to the SC is related to the following question and provides information on the serious concerns raised by the DRAFT Response, which are the approaches that have been discussed to date. Appendix "A" to these comments includes a copy of this presentation.

Question: In the electric industry, some of the tariff, rate schedules, or service agreements for organized markets are 'shared', i.e., managed jointly, in part, or separately by various entities. Can multiple Company Identifiers be entered for one Filing Identifier?

Response: No, an eTariff database will be assigned one Company Identifier for such organized market (e.g., ISO New England). The following are two methods by which the individual pieces of a shared tariff, rate schedule, or service agreement can be submitted. It is up to the stakeholders in an organized market to determine which way works best for their situation.

- The Company Identifier, corresponding password and all relevant Data Elements are provided by the organized market administrator to the various entities responsible for the submission of individual pieces.
- The individual pieces of the shared Jurisdictional Document are prepared by the responsible entity and then passed to the organized market administrator for submission to Commission.

Question: In the electric industry, some utilities have identical rate schedules that are bilateral or multi-party agreements. Today, they make joint paper filings that include multiple copies of the same rate schedule, with different headers and footers but include all the (otherwise identical) rate schedules in one filing package. Can FERC develop a more efficient means for addressing such joint rate schedules than having each company have to submit the rate schedule in a separate Tariff Filing?

Response: FERC should address this issue.

The next question address two concerns and more clarity is needed. The key question is what needs to be treated as a Tariff Record and what as an attachment in the context of gas pipeline agreements. Plainly, under either Option the updated rate tariff sheet is a Tariff Record. Currently it appears a redlined and signed copy of the non-conforming agreement would be an attachment. The question is whether that agreement also is filed as a Tariff Record under Option 1; it appears it would be for under Option 2. Commission may want to consider eliminating the need for a signed copy as the clean copy for posting.

Question: Currently the Commission policy provides for two options for the filing of negotiated rate information for the gas pipeline industry:
Option 1: updated rate tariff sheet (which may be filed with the corresponding transportation service agreement) or
Option 2: the transportation agreement with a negotiated rate letter.
Will the negotiated rate agreements be contained in the Commission's eTariff database for either or both options? If so, how are the two types of filings to be submitted?

Response: Both options should be supported in the Commission's eTariff database.

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Question: Can tariff sheets be motioned in to effect without making a Tariff Filing?
Response: No, there is a Type of Filing for motion filings.

Prior to Tariff Submitters submitting a Tariff Filing with the Commission, the Commission needs to give guidance to Tariff submitters on their baseline Tariff Filings. The DRAFT Responses below are suggested answers to the questions based on the participant's understandings of past Commission action on these matters.

The Baseline Compliance Filings

Question: On the date of a baseline Tariff Filing, some text of a tariff, rate schedule, or service agreement that is being submitted in the baseline Tariff Filing may not have been acted upon by the Commission; should the Tariff Records reflect the revised text?
Response: No the text should not reflect the "pending" text, if the text is accepted, a compliance filing should be made.

Question: On the date of a Baseline Compliance Filing, some text of a tariff, rate schedule, or service agreement that is being submitted in the baseline Tariff Filing has been filed and accepted but set for hearing/settlement as possibly unjust and unreasonable; should my Tariff Records reflect the accepted text?
Response: Yes. If Commission ultimately rejects or accepts but alters the text, a compliance filing will be required.

Question: On the date of a baseline Tariff Filing some text of a tariff, rate schedule, or service agreement that is being submitted as a baseline Tariff Filing has been accepted by the Commission, but the Commission has ordered that some of the accepted text be modified; what language should the Tariff Records reflect?
Response: Commission should provide the Tariff Submitter the option of filing the old text and then later file compliance text, or making a baseline Tariff Filing that reflects its compliance obligation.

Question: On the date of a baseline Tariff Filing, some text of a tariff, rate schedule, or service agreement that is being baselined has been accepted but Tariff Submitter is proposing in a Settlement Agreement/Offer of Settlement (Settlement) that has yet to be approved by Commission to alter the text; what language should the Tariff Records reflect?
Response: The text should not reflect the settlement. Once the settlement is accepted, a compliance filing should be made.

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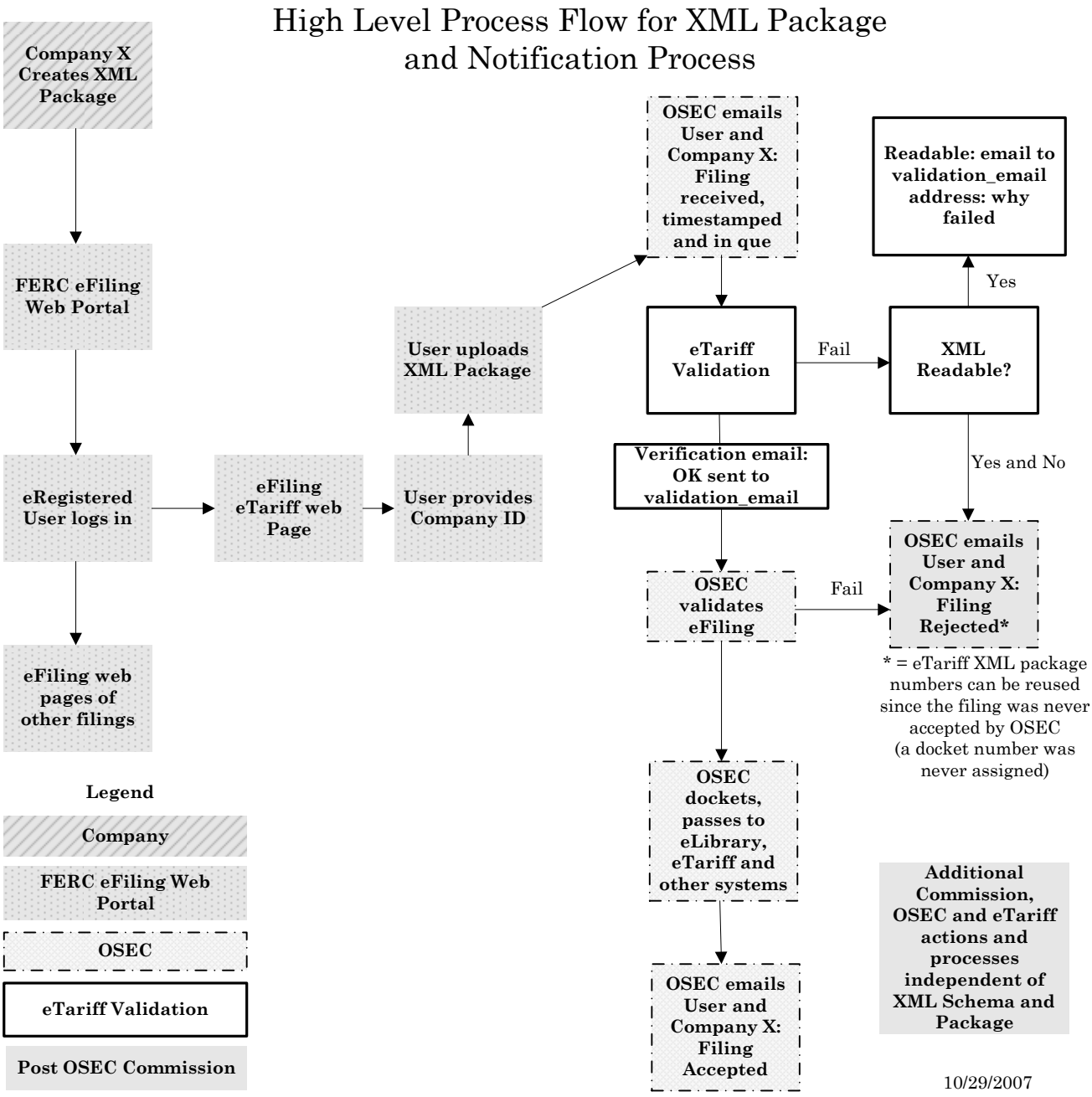
NAESB UPDATE: ETARIFF INFORMATION FLOW DIAGRAM
APRIL 15, 2008



NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

TAB 6

WEQ Subcommittee Updates

- The materials for subcommittee activities are included. The materials are provided for discussion purposes and no action is required of the WEQ EC members. Other presentation materials will be made available after the meeting. Included are:
  - Triage Report
  - Summary of meetings held for BPS, ESS/ITS, JISWG and SRS
- The materials in Tab 6 correspond to agenda item 6.

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March 19, 2008
Via email and posting

TO: **NAESB Executive Committee (EC) Members, EC Alternates**

Submitters: Dona Gussow, Dale Davis, Barbara Rehman

Subcommittee Chairs for Notification:
Paul Sorenson, Marcie Otondo, J.T. Wood, Ed Skiba, (WEQ ESS/ITS/BPS)
Valerie Crockett, Richard Smith, Kim Van Pelt, Dolores Chezar (WGQ BPS)
Dale Davis and Christopher Burden (WGQ IR)

FROM: NAESB Office

RE: NAESB Triage Actions Taken for R08008, R08009, R08010 and R08011

Dear Triage Committee and EC members,

The four requests – R08008, R08009, R08010, R08011 -- all provided below as hyperlinks, were sent out for consideration on March 5. There were no requests for conference calls for discussions, and no adverse comments received. A comment was noted that should an item have direct bearing on the FERC Order No. 890 deadlines, it should be given a high priority, which could be determined by the subcommittee chairs, (this comment was directed to request no. R08011). The requests were triaged as follows:

For R08008 – submitted by Dona Gussow on behalf of Florida Power and Light:

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to develop customer security administration standards, it should be assigned to the WGQ Business Practices Subcommittee (BPS). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ BPS.
>
> The request notes that standards are needed to assure Customer Security Administrators have basic tools on the pipeline website for requesting access for new users, exercising control in designating who gains access to the pipeline website, what functions and levels are to be authorized for the users, and to be able to quickly review/audit/verify the CSA information (and any requested changes) according to pipeline records. The standards should provide an auditable tool for pipeline customers to manage, control, and verify who has access to company proprietary information that may be contained on a pipeline (or gas storage service provider's) website.

For R08009 – submitted by Dale Davis on behalf of the Williams Gas Pipeline:

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add one validation code value to NAESB WGQ Standard No. 1.4.2 - Nomination Quick Response and to add one code value to the Reduction Reason Code data element of the NAESB WGQ Standard No. 1.4.5 - Scheduled Quantity, it should be assigned to the WGQ Information Requirements Subcommittee (IR). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ IR.
>
> The request notes that the addition of one code value and one error code provides for more specific notifications within the nomination and scheduling processes, and the addition of these code values will more accurately reflect notifications in the nomination and scheduling process.

For R08010 – submitted by Dale Davis on behalf of the Williams Gas Pipeline:

> This request is (1) found within scope; (2) to be assigned to the Wholesale Gas Quadrant (WGQ); and (3) because it is a request to add the data element "Cycle Indicator" in the transaction datasets for NAESB WGQ Standard No. 5.4.1, Offer Download (C), NAESB WGQ Standard No. 5.4.2, Bid Download (C), NAESB WGQ Standard No. 5.4.3, Award Download (C), and NAESB WGQ Standard No. 5.4.7, Offer Upload (BC) and add corresponding error/warning codes in the transaction dataset for NAESB WGQ Standard No. 5.4.8, Offer Upload Quick Response, it should be assigned to the WGQ Business Practices Subcommittee (BPS). As there was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WGQ BPS.

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> The request notes that the addition of this data element provides the mechanism in which to specify a particular cycle within the capacity release process for both EBB and ANSI EDI X12, and will more accurately identify the cycle associated with the offer, bid and award.

For R08011 and Attachment – submitted by Barbara Rehman on behalf of Bonneville Power Administration:

> This request is (1) found within scope; (2) to be assigned to the Wholesale Electric Quadrant (WEQ); and (3) because it is a request, consistent with ¶51 of FERC Order No. 890-A, to add AFC and TFC values to the "System_Attribute" data element of the NAESB Standard WEQ-003: OASIS S&CP Data Dictionaries, it should be assigned to the WEQ Electronic Scheduling Subcommittee/Information Technology Subcommittee (ESS/ITS). There was nothing in the request indicating that it should be assigned a high priority, therefore, it should be addressed in the normal course of business of the WEQ ESS/ITS.
>
> The request notes that the addition of AFC and TFC to system data postings will reflect the desire of many transmission providers to provide their customers with both AFC and TFC queriable values, which is accomplished through the addition of AFC and TFC to the list of valid data element values for SYSTEM_ATTRIBUTE.

The noted dispositions for the requests and the requests themselves were forwarded to the Triage Subcommittee and the EC members on March 5. There were no dissenting comments received. As such, the requests are considered in scope and assigned to the indicated subcommittees for development. Please note that this communication serves as notice to the subcommittee chairs of the subcommittees to which the requests are assigned.

From: Love, Paul
Sent: Tuesday, March 25, 2008 9:00 AM
To: Rae Mcquade
Subject: Request R08008

Request R08008 which was recently triaged, found to be in scope and assigned to BPS causes concern for NGPL. Annually, our system security procedures are reviewed by our auditors as part of their Sarbanes Oxley (Sarbanes) review. Our auditors have very specific views on how data security access should be controlled to include who can update data and network security. The perplexing nature of Sarbanes controls reviews is that each auditing firm develops its own guidelines as to what is an acceptable/appropriate control. Thus, when addressing this request NAESB **must be extremely careful not** to develop any standards that require a specific technical/process solution since such specificity may not comply with particular Sarbanes guidelines.

Additionally, to the best of my knowledge security to web sites has not been standardized in any other industry. In other industries, guidelines have been established and then the mechanics of what and how security is implemented on each web site is left up to the individual web site owner (I know from personal experience that this is the case in the financial/banking industry). By having different security implementations, it becomes more difficult for individuals to gain industrywide unauthorized access to data or systems.

Based on these considerations, NGPL originally felt that this request was out of scope but is willing to proceed, with great caution, to consider it. It is NGPL's position that only guidelines as opposed to standards, can be developed and those guidelines need to broad enough to cover many varied implementations.

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NAESB EXECUTIVE COMMITTEE MEETING MATERIALS
WEQ SUBCOMMITTEE SUMMARY AS OF MAY 1, 2008

Joint Electronic Scheduling/Information Technology

- **January 15-16, 2008:** The ESS/ITS met in Carmel IN to address informal comments on preconfirmation priority, rebid of partial service and group 2 metrics and redispatch posting requirements. The group also agreed to continue discussion on NITS transaction concept paper for group 3 network service on OASIS. The subcommittee reviewed and responded to the informal comments submitted by Progress Energy, Puget Sound, Salt River Project, and NERC. The participants plan to review and respond to the remaining comments at the next meeting.
- **January 31, 2008:** The ESS/ITS met in via conference call to continue to address informal comments on preconfirmation priority, rebid of partial service and group 2 metrics and redispatch posting requirements. Several of the comments were added as parking lot items to be addressed at a later time. All comments were reviewed and either addressed or added to the parking lot list of items. It is expected that at the next meeting, the parking lot items will be addressed and the recommendation should be voted out to proceed to formal comment.
- **February 11-12, 2008:** The ESS/ITS met in Reno to continue work to prepare the recommendations on Preconfirmation Priority and Re-bid of Partial Service, and Metrics and Redispatch Cost Posting for formal comment, through a review of the service request table, and the parking lot issues. The group revised the service request table and voted to post the recommendation for Preconfirmation Priority and Re-bid of Partial Service, and Metrics and Redispatch Cost Posting for formal comment The subcommittee also voted to post the recommended standards for Rollover on Redirect for an informal comment period.
- **February 20, 2008:** The ESS/ITS sent a request for comments on rollover rights on redirect on firm basis, due on March 25. Comments were received from Southern Company Generation, MISO, BPA, PJM, APS and Southern Company Transmission.
- **February 25, 2008:** The ESS/ITS met via conference call to review the registry system work to date from the Joint Interchange Scheduling Working Group (JISWG), which includes topology information to track contract paths between transmission providers. With the work on NITS, the concept paper was reviewed including the scope and the relation to request R04006E. The project was defined to address both firm and non-firm service network, to which everyone agreed. Several items were added to the parking lot set of issues for NITS including: designation and undesignation of resources and loads, forecasts issues, transmission providers needs including ATC calculating, auditing / tracking, billing integrity, initial applications requirements and process (evaluation, studies, queuing, status, deposit/ queue time), granularity and timing of information submitted, network customer needs including understanding of processes and ease of use, confidentiality (masking), transparency for other market participants, and secondary network service issues.
- **March 3, 2008:** The ESS/ITS met via conference call to address the business needs for NITS including: designation and undesignation of resources and loads, forecasts issues, transmission providers needs including ATC calculating, auditing / tracking, billing integrity, initial applications requirements and process (evaluation, studies, queuing, status, deposit/ queue time), granularity and timing of information submitted, network customer needs including understanding of processes and ease of use, confidentiality (masking), transparency for other market participants, and secondary network service issues. During the meeting the group discussed the designation and undesignation of loads and resources and developed a work paper capturing the concepts discussed.
- **March 17, 2008:** The ESS/ITS met via conference call to discuss the needs for NITS designation and undesignation of resources and loads, including it components and the various ways that loads can be designated and undesignated. A reservation representing native load from which loads can be undesignated was discussed. The information needed for OASIS to represent designation and undesignation of resources and loads was identified, including mean for tracking resources and loads. . The group agreed that OASIS should have the capability to represent forecast issues and mask such information as needed. ATC auditing / tracking functions in OASIS should be designed to identify

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changes to OASIS including the party that made the change and the time it was made, with an expectation that this information could be tracked for five years.

- **March 24, 2008:** The ESS/ITS met via conference call to continue discussion on NITS business needs. The discussion continued with transmission provider needs including ATC calculations, auditing/tracking, billing integrity – specifically the calculations and the extent to which it will be required – including reservations over posted paths for POR/POD, as resource/loads or combinations. Query functions were also discussed.
- **April 3-4, 2008**: The ESS/ITS met via conference call to discuss conditional firm issues, to review a draft rollover recommendation and to identify the rollover or redirects concepts. the agenda topics included a review of Order 890A work plan, conditional firm issues, rollover of redirects and NITS – first task- business needs.
- **April 15, 2008:** The ESS/ITS met in Charlotte, NC to review of informal comments of conditional firm issues and finish the review of informal comments of rollover of redirects. The group determined that additional template(s) be used to support the new functionality being requested for conditional firm instead of being placed in transtatus. The group also supported additional template(s) be used to support the new functionality being requested for conditional firm instead of being placed in transtatus.
- **April 29-30, 2008**: The ESS/ITS met via conference call to discuss the informal comments of conditional firm issues, to complete the review of informal comments of rollover of redirects and to review the formal comments on WEQ-001 recommendation. The group at the end of the day drafted to the conditional firm business practice. They decided to support posting descriptions of curtailment conditions and that templates should be added or revised to address such a posting including a number of curtailment criteria. Several issues were placed on the parking lot for issues to be addressed at a later time, including restrictions on firm redirects of service that is at a curtailment priority level, should a template be needed for assignment of short term firm to CCO reservation, and additional characteristics of redirects.
- **May 7, 2008**: The ESS/ITS plans to meet via conference call to discuss comments on conditional firm issues, and to address NITS concepts.

Electronic Scheduling/Information Technology/ Business Practices on Order No. 890

- **January 3-4, 2008**: The joint group met via conference call to address ATC Narratives and peak load proposed standards. It was anticipated that the group would vote out both sets of proposed standards for formal comment, neither of which occurred.
- **January 11, 2008**: The joint group met via conference call to continue to address ATC Narratives proposed standards. Modifications were made to the proposed standard, however the subcommittee did not vote out the standard/.
- **January 16-17, 2008**: The joint group met in Carmel, Indiana to address ATC Narratives proposed standards plus a review the Draft Cover Letter to be attached to the NAESB Draft List of ATC Information not to be made publicly available, a review of the Load Forecast and Actual Load proposed standards, revisions to the 890 Work Plan and Order 890-A impacts, and a review the draft CBM requirements. During the meeting, the group continued discussions regarding the ATC Narratives and developed a work papers tracking the motions and extraneous issues presented during the meeting.
- **January 18, 2008**: The joint group met via conference call to address ATC Narratives proposed standards with NERC. The topics to be addressed during the meeting included the ATC/TTC Narrative Recommendation, the list of information that will not be publicly available (Process and timeline), the NERC proposed approach for the establishment of CBM specific to requests/set aside., the relative priority of CBM request vis-à-vis transmission service request, the appropriateness of request for near-term monthly adjustments to CBM, the commercial impact of

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CBM if margin versus service, the concern over capacity that can only be used during an emergency can trump a request from a firm-designated resource for delivery to firm load, the timing of the CBM request relative to the ratemaking process, and the information NERC needs from NAESB regarding post back list, counterflows, and counter schedules in the NERC Process. During the meeting, the NERC Team and the subcommittee reviewed the coordination process and discussed how to manage overlapping standards. In addition, the NERC Drafting Team undertook to discuss the CBM issue identified by NAESB during their next meeting.

- **January 18, 2008**: The joint group met via conference call to address ATC Narratives proposed standards. It was anticipated that the group would vote out the proposed standards for formal comment, which did not occur. The group discussed the cover letter and list of information that would not be made public. The cover letter and list of ATC related information was sent to NERC for its review and voted out of the subcommittee to be sent for informal comment.
- **January 22, 2008**: The joint group sent out the proposed standards for the list of information that will not be made public, information associated with the calculation of ATC and its associated components for informal comment, with comments due on February 8. Four sets of comments were received from NYISO, PJM, MISO and BPA.
- **January 28, 2008**: The joint group met via conference call to address ATC Narratives proposed standards. During the meeting, the group addressed the ATC/TTC Narrative Recommendation, however the participants felt that a vote to send the standard to the Executive Committee was premature.
- **January 28, 2008**: The joint group met via conference call to discuss the ATC Narratives proposed standard with NERC and to provide feedback on the NERC MOD Responses. During the meeting, the groups reviewed the ATC Narrative proposed standard and the current version of the NERC MODs. Both groups undertook to discuss the issues identified during the meeting at their next meetings.
- **February 8, 2008**: The joint group met via conference call to address ATC Narratives proposed standards with NERC. Four items were addressed: NERC feedback on the NAESB ATC/TTC Narrative recommendation, status of NERC ATC-related MODs, status of NERC's response to the list of ATC-Related information not to be made publicly available, and status of NAESB's work on the postback list.
- **February 13, 2008**: The joint group met in Reno to address ATC Narratives proposed standards with the expectation that the recommendation would be voted out of committee and would proceed to formal industry comment. The recommendation of load forecast/actual load was to be reviewed and considered for informal comment. During the meeting, the group voted to post the ATC Narrative standard for formal comment and to send the standard to the Executive Committee. The group also reviewed the directives from the February 4-5, 2008 Executive Committee meeting and continued to address the Load Forecast and Actual Load proposed standard.
- **February 21-22, 2008**: The joint group met via conference call to address Load Forecast and Actual Load proposed standards. The topics to be addressed in the meeting included concept discussions, a review of the draft recommendation titled "OATI Recommendation on Load Forecast - 2/6/08 - Revision 3," different aspects of MOD028-MOD030 in small groups, to consolidate small group work products, review completed recommendation, and to determine disposition of recommendation. The group reviewed the OATI recommendation on Load Forecast and continued to modify the proposed standard based upon the consensus of the participants.
- **February 27, 2008**: The joint group met via conference call to address Load Forecast and Actual Load proposed standards. The topics to be addressed in the meeting included review of, possible modification to, and voting out the recommendation. As the recommendation was drafted and modified, it did not pass a balanced vote. The recommendation and additional modifications will be considered at a subsequent meeting.
- **March 5, 2008**: The joint group met via conference call with NERC to address NERC feedback on the NAESB ATC information list and the status of the NAESB work of the Postback list. Load Forecast and Actual Load

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proposed standards. NERC has not yet completed its review on the ATC information list, including posting on OASIS and its impact on security and physical infrastructure. For postbacks, the discussion centered on the relationship to firm resales. The postback discussion will continue at a subsequent meeting.

- **March 10-13, 2008**: The joint group met in Phoenix to address Load Forecast and Actual Load proposed standards with an expected vote, counterflows / postbacks, the ATC information link, and ATC / AFC and TRM proposed standards. During the meeting, the group voted to post the Load Forecast and Actual Load and the ATC Information Link proposed standards for the 30 day formal comment period. The participants also began conceptual discussions concerning the counterflows/postbacks, TRM, and ATC/AFC standards. Assignments were distributed for future meetings.

- **March 28, 2008**: The joint group met via conference call to address the AFC/ATC 2008 Annual Plan Item 2.b.v, -- business practice standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)). in addition, the group was to address Annual Plan Item 2.b.v.1 - business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards. both of these items require coordination with the NERC Order 890 reliability standards development. During the meeting, the co-chairs presented the group with the Action Item Spreadsheet and an Order 890 Progress Report, which will be maintained on the joint group's web page. The participants also began discussions on the ATC and AFC calculation methodologies to complement the NERC MODs.

- **March 31, 2008**: The joint group met via conference call to address Transmission Reliability Margin (TRM) business practice proposed standards. The topics to be discussed regarding TRM included scope, agreed to concepts and assignments to draft the recommendation. After discussion the group determined that the TRM standard had been addressed through the ATC Information Link recommendation as well as through Final Action recommendation number 2007 WEQ Annual Plan Item 2(ii) (Group 1: Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority.

- **April 7, 2008**: NERC met jointly with NAESB to discuss frequency for constrained paths per FERC Order No. 890 ¶301 and Order No. 890-A ¶101 regarding ATC calculations performed more frequently for constrained paths. After discussions it was jointly supported that NAESB would not address use of TRM.

- **April 7, 2008**: The joint group met via conference call to discuss 2.b.v (Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability))), and 2.b.v.1 (Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards).

- **April 16-17, 2008:** The group met over a two day period in Charlotte to discuss language of business practices for postbacks and counterflows, determined that no additional standards were needed for the frequency and posting of all ATC components (2008 AP Item No. 2.b.v.1). Discussions began on ETC.

- **May 1, 2008:** The group met via conference call with NERC and updated the Order 890 plan, discussed how conditional firm would be treated as firm point to point service with conditions on it and if one of the conditions occurs the service priority level will be reduced from level seven to level six. NAESB will likely address competing request for CBM as NERC is not addressing such in their standards, and determined that other than the reporting information for posting, NAESB does not need to address counterflows.

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NAESB EXECUTIVE COMMITTEE MEETING MATERIALS
WEQ SUBCOMMITTEE SUMMARY AS OF MAY 1, 2008

- **May 1, 2008:** The group met jointly via conference call to address counterflows (2.b.ii.2) and transfer capability(2.b.vi). In both cases, the group determined that no other standards needed to be developed by NAESB and continued work on ATC Related Information list.

NERC/NAESB Joint Interchange Scheduling Working Group

- **January 23-24, 2008**: The joint group met in West Palm Beach to address registry specification issues and to complete the document for an informal comment period. The possible interpretation of interchange start and stop time have two sets of values was discussed – which was determined to be resolved through the addition of a completed time. The group also discussed eTag specifications in out of sequence tag orders and provided clarification to the Interchange Distribution Work Group regarding cancellations and terminations. eTag security and management of entity URLs was discussed. Correspondence to NERC is expected on this item. The transition of the registry from NERC to NAESB was also highlighted. During discussion on the coordinate interchange timing tables, the group identified reviewed changes to INT-005, INT-006 and INT-008 tables. The draft confidentiality agreement for protecting data in the registry was reviewed with modifications made for non-disclosure items. Towards the end of the meeting, NERC raised the possibility of combining the NERC Interchange Subcommittee with the JISWG. The group did not a reach a conclusion on this item.
- **January 29, 2008**: The JISWG sent a request for informal comments on the registry specifications, due on March 14. Comments were received from MISO and BPA.
- **March 19-20, 2008**: The joint group met in Houston to address the comments on the registry specifications, to identify eTag enhancement requests and the discuss modifications to the coordinate interchange standards and the confidentiality agreement. The decisions reached or deliverables created or amended included the release of the EIR for legal review so that a RFP can be drafted, and the review efforts for DUNs coding. The eTag enhancements will probably be drafted as NAESB standards and a number of possible routes for such were discussed. The group continued its work to clean up the CI standards.
- **March 27, 2008**: The JISWG sent a request for informal comments on the eTag 1.8.1 enhancements specifications, due on May 20. Comments have not yet been submitted.

Business Practices Subcommittee (non Order 890)

- **January 29-30, 2008:** The WEQ BPS met via conference call to address TLR, joint operator's manual, phase 2 and phase 3 work. During the discussion on the manual and the inclusion of NAESB standards, the timing of FERC adoption of NAESB standards and the filings made by NERC and NAESB were discussed as both could easily be in different schedules based on the FERC and Canada. Phase 3 work, based on IRO-006 and IRO-007 – including specifications for eastern interconnections and DC ties. Phase 2 work, the field test, was discussed with the recommendation that 30 minutes should be the uniform requirements to relieve overloads exceeding 3% with some exceptions highlighted.
- **April 1-2, 2008:** The group met in Carmel to discuss TLR. NERC provided meeting administration. The VSL guidelines were reviewed including the compliance with the NERC process. The phase 2 field test report current status was reviewed – including testing through October 31 for the market flow field test with a threshold of 5%. The joint operator's manual should be presented at the June SC meeting.
- **April 25, 2008:** The group met in Houston to address TLR and non-TLR issues – including request R07019, R07020, provide an update on the TLR phase 2 and phase 3 efforts, to move request R05020 to JISWG and to determine if additional standards are needed to support the IDC.

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NAESB EXECUTIVE COMMITTEE MEETING MATERIALS
WEQ SUBCOMMITTEE SUMMARY AS OF MAY 1, 2008

Standards Review Subcommittee

- **January 7, 2008:** The SRS met via conference call to review several actions underway at NERC including ORG09 – ORG018, NERC Balancing Authority Controls (Project 2007-05) SAR, for which it was determined that NAESB did not require any complementary standards development.
- **February 6 2008:** The SRS met in Houston to reconsider NERC Balancing Authority Controls (Project 2007-05) SAR with the NERC drafting team leadership. It was reconfirmed at that time that NAESB development was not needed. , for which it was determined that NAESB did not require any complementary standards development. The NERC activity was reviewed for possible complementary standards development. While several projects were identified for monitoring, it was agreed that no development at this time need be recommended.
- **March 6, 2008:** The SRS met via conference call and reviewed R03017 – a recommendation to decline the request as the intent is being fulfilled in other standards development activities. The SRS also identified two recommendations: (1) OASIS changes for rebid of partial service, preconfirmation priority and group 2 metrics and (2) ATC narratives for review. Assignments were made on these items.
- **April 23, 2008:** The group met and reviewed discrepancies between NERC and NAESB definitions, they also reviewed R03017 recommendation, the outstanding minor corrections for WEQ 001-1.7b and several assignments were made for upcoming meetings.

Interpretations Subcommittee

- **2008**: The Interpretations Subcommittee will meet as requests for interpretations are received. To date, no requests have been forwarded for consideration in 2008.

JOINT QUADRANT EFFORTS

DSM-EE PROJECT – ASSIGNED TO RETAIL GAS, RETAIL ELECTRIC AND WHOLESALE ELECTRIC:

- **2008:** Schedule of meetings for DSM-EE are January 23 (Baltimore), March 28 (Houston), May 30 (Holyoke), July 30 (Indianapolis?), September 30 (Austin), December 2 (TBD). Task force conference call and meetings are held to prepare for these meetings.
- **January 23, 2008:** The group met in Baltimore to review progress on the two matrices, the preamble and the glossary. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. Data is being placed in five separate categories -Initial Testing and Auditing, Ongoing Testing and Auditing, Triggering; Construction, Statistical Analysis, Performance and Baselines. The matrix for retail DR programs is lagging but several companies have provided or agreed to provide data – including BGE, Dominion, ConEd, Alabama Power and ComVerge. Procedures for how to collect the data was discussed with both interviews online and distributed surveys discussed. Both the preamble and glossary while first drafts are available are dependent on the work of the matrices and cannot be further developed until after more progress has been made on the matrices.
- **March 28, 2008:** The group met in Houston to review progress on the two matrices. The wholesale matrix for DR programs administered by ISOs and RTOs was reviewed. The matrix had expanded significantly to provide for more comparability for responses. 45 DR programs have been identified and the data is now being verified. A template for the type of standards to be expected from this effort was reviewed. The retail matrix now has additional data and several interviews were conducted online, with the conclusion that it is the preferred way to gather data. The retail

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group is to set up a face-to-face meeting in May to review the matrix and make changes before sending it out to utilities for interviews.

E-TARIFF STANDARDS DEVELOPMENT – ASSIGNED TO WHOLESALE GAS AND WHOLESALE ELECTRIC:

- **January 23-25, 2008:** A meeting was held in Colorado Springs to review the progress made on the eTariff standards and implementation guide and to vote the recommendation out for formal comment by the industry. Several comments were reviewed and changes made to the recommendation as a result. Open issues were listed with the expectation that the chairs (Mr. Sappenfield and Ms. Daly) would provide chairs' comments to highlight possible actions that could be taken outside the NAESB standards development effort. There were no opposing votes to the revised recommendation.

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

TAB 7

2008 WEQ Annual Plan

- The 2008 plan as approved by the Board of Directors at its March 2008 meeting is included with redlines provided from subcommittee leadership. Should the WEQ EC determine that changes are to be made to the plan as a result of the subcommittee updates; a motion to approve the changes for forwarding to the Board for approval would be required. The motion would require a simple majority to pass.
- The materials in Tab 7 correspond to agenda item 7 for the WEQ EC agenda.

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	Item Description	Completion[1]	Assignment[2]
1	**Develop business practices standards as needed to complement reliability standards**		
	Develop business practice standards to support and complement NERC reliability standards, NERC policies and NERC standards authorization requests (SARs) using the NERC/NAESB Coordination Joint Standards Development Process as appropriate. Current NAESB activities underway to develop business practice standards that are supportive of this annual plan item are:		
a)	Make version 2 changes to business practices as requested.		
i)	Make changes to business practices as related to inclusion of the NERC Reliability Functional Model functional model entities as NERC undertakes the same efforts. Status: No requests.	As requested	BPS
ii)	Continuous support of TLR Procedure in alignment with NERC efforts on TLR Phase II and Phase III which would be included in version 2 development.[3] Status: Ongoing as NERC makes changes.	Ongoing	BPS[4]
b)	Develop business practices to support Coordinate Interchange – R05020 "Include a guideline for rounding schedules with partial mWh's in the coordinate interchange business practice WEQ BPS-002-000" Status: Underway.	2008	~~BPS,~~ JISWG
c)	Operate Within Limits (R03017) as coordinated with the NERC schedule on the same development for reliability standards		
i)	Review the need to develop business practice standards to support Operate Within Limits (R03017) Status: Completed.	1st Q, 2008	SRS
ii)	Develop business practice standards to support Operate Within Limits (R03017) Status: Not Started. Depending on the WEQ EC decision on 1c(i), this item will be considered complete	4th Q, 2008	BPS
d)	Prepare recommendations for future path for TLR in concert with NERC, which may include alternative congestion management procedures[5] Status: ~~Not Started~~Underway.	4th Q, 2008	BPS[6]

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	Item Description	Completion[1]	Assignment[2]
~~e)~~	~~Determine any needed NAESB action in support of the Interchange Distribution Calculator (IDC) and develop any necessary standards.~~ ~~Status: Not Started.~~	~~4th Q, 2008~~	~~BPS~~

2 Develop business practice standards in support of the FERC RM05-25-000 and RM05-17-000 (OATT Reform)

a) Develop version 2 business practice standards to better coordinate the use of the transmission system among neighboring transmission providers. Such business practice standards would be based on recommendations from NERC's Long Term ATC/AFC Task Force and would involve revised procedures for the ATC calculation and/or revised protocols as determined by the final order.

Status: Underway using joint standards development process with NERC. Request R050004 was expanded to include the Order No. 890 (Docket Nos. RM05-25-000 and RM05-17-000) and Order No. 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002), "Preventing Undue Discrimination and Preference in Transmission Services", issued April 11, 2007).

i) Group 1: Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority

1.	Conditional Firm, Annotations For ATC; Load Forecast And Actual Load; Re-Bid Of Partial Service; And Preconfirmation Priority S&CP Requirements Status: Completed	4th Q, 2007	ESS/ITS
2.	Conditional Firm Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Not Started	3rd Q, 2008	ESS/ITS
3.	Annotations For ATC Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed	1st Q, 2008	BPS, ESS/ITS
4.	Load Forecast And Actual Load Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Complete	1st Q, 2008	BPS, ESS/ITS
5.	Re-Bid Of Partial Service Business Practice Standards on a Single Transmission Provider's System associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed	1st Q, 2008	ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
6.	Preconfirmation Priority Business Practice Standards associated with S&CP Requirements completed in 2(a)(i)(1) Status: Completed	1st Q, 2008	ESS/ITS
7.	OASIS Exemptions Appendix Status: Completed	4th Q, 2007	ESS/ITS
ii)	Group 2: Metrics; Redispatch Cost Posting		
1.	Metrics Related to Provision of Transmission Service (Paragraph 413 of Order 890) Status: Completed	1st Q, 2008	ESS/ITS
2.	Metrics Related to Performance of Transmission Studies (Paragraphs 1308 through 1317 of Order 890 Status: Completed	1st Q, 2008	ESS/ITS
3.	Redispatch Cost Posting • Monthly average cost of redispatch • A high and low redispatch for the month Status: Completed	1st Q, 2008	ESS/ITS
iii)	Group 3: Network Service On OASIS		
1.	Use of OASIS to Make Electronic Requests to Designate and Terminate Network Resource Status: Underway	3rd Q, 2008	ESS/ITS
2.	Ability to Query Requests to Designate and Terminate Network Resources and Allow for Queries of All Information Provided with Designation Requests Status: Underway	3rd Q, 2008	ESS/ITS
3.	Masking of Designated Network Resource Operating Restrictions and Generating Cost Information Status: Underway	3rd Q, 2008	ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
4.	Procedural Requirements for Submitting Designations over new OASIS Functionality Status: Underway	3rd Q, 2008	ESS/ITS
5.	Specify How Designated Network Service Informational Postings are Posted on OASIS Status: Underway	3rd Q, 2008	ESS/ITS
6.	Set Forth the Treatment of OASIS Requests when the Customer Fails to Provide the Necessary Attestation Status: Underway	3rd Q, 2008	ESS/ITS
7.	Procedural Requirements for Submitting Both Temporary and Indefinite Terminations of Network Resources Status: Underway	3rd Q, 2008	ESS/ITS
8.	Procedures for Submitting and Processing Requests for Concomitant Evaluations of Transmission Requests and Temporary Terminations Status: Underway	3rd Q, 2008	ESS/ITS
iv)	Group 4: Pre-Emption; Request No. R05019; and Revisions to Standard 9.7		
1.	Pre-Emption Status: Not Started	3rd Q, 2008	ESS/ITS
2.	Request No. R05019 Status: Not Started	3rd Q, 2008	ESS/ITS
3.	Revisions to Standard 9.7 Status: Not Started	2nd Q, 2008	ESS/ITS
v)	Group 5: Paragraph 1377		
1.	Paragraph 1377 Status: Not Started	4th Q, 2008	ESS/ITS
2.	Re-Bid Of Partial Service across Multiple Transmission Providers' Systems Status: Not Started	4th Q, 2008	ESS/ITS

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Item Description	Completion[1]	Assignment[2]
vi) Group 6: Miscellaneous (Paragraphs 1390 and 1627 of Order 890)		
1. Paragraph 1390 of Order 890 Status: Not Started	3rd Q, 2008	ESS/ITS
2. Paragraphs 1627 of Order 890 Status: Not Started	3rd Q, 2008	ESS/ITS
3. Redispatch Cost Posting to allow for posting of third party offers of planning redispatch services. Status: Not Started	3rd Q, 2008	ESS/ITS
4. Posting of **Existing Transmission Commitments (ETC)** (moved from Group 1) Status: Not Started	2nd Q, 2008	ESS/ITS
vii) Group 7: Tagging for Conditional Firm Service		
1. Tagging for Conditional Firm Service Status: Underway	2nd Q, 2008	ESS/ITS
b) Develop the needed business practices as companion to the NERC standards for ATC related efforts.[7]		
i) Develop standards to support existing Request No. R05004. Status: Underway	4th Q, 2008	BPS, ESS/ITS
ii) Develop Business Practice Standards for **Existing Transmission Commitments (ETC)**		
1. Develop the Business Practice Standards complementary to NERC Reliability Standards for **Existing Transmission Commitments (ETC)** to create a "consistent approach for determining the amount of transfer capability a transmission provider may set aside for its native load and other committed uses", including the elements of ETC for full implementation of the NERC MOD-001 reliability standard. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Not Started.	June ~~1~~30, 2008	BPS, ESS/ITS

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Item Description	Completion[1]	Assignment[2]
2. Business practice standards for accounting for counterflows. These standards will be included in the ATC business practice standards. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Underway	June 1, 2008	BPS, ESS/ITS
iii) **Capacity Benefit Margin (CBM) Business Practices**		
1. Determine if business practice standards are needed, and if so, develop them to set forth "how the CBM value shall be determined, allocated across transmission paths, and used" and how transmission providers will "reflect the set-aside of transfer capability as CBM in the development of the rate for point-to-point transmission service." The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Underway.	June 1, 2008	BPS, ESS/ITS
2. Business practice standards that include an OASIS mechanism to "allow for auditing of CBM usage." The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Underway.	June 30~~1~~, 2008	BPS, ESS/ITS
3. Any additional business practice standards needed to complement the NERC CBM reliability standards (MOD004) created as a result of this effort. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Underway	June 1, 2008	BPS, ESS/ITS

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Item Description	Completion[1]	Assignment[2]
iv) **Transmission Reliability Margin Business Practices:**		
1. Transmission Reliability Margin (TRM): Business Practice Standards to complement the NERC reliability standards for TRM. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: ~~Underway~~Completed ((The NAESB subcommittees have determined TRM requirements have been documented in previously submitted recommendations, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	~~June 1~~April 8, 2008	BPS, ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
	2. The business practice standards will include specification of the appropriate uses of TRM and when transmission providers may set aside TRM. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development Status: Completed ((The NAESB subcommittees have determined TRM requirements have been documented in previously submitted recommendations, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)~~Underway~~	~~June 1~~April 8, 2008	BPS, ESS/ITS
	3. Any additional business practice standards needed to complement the NERC TRM reliability standards (MOD008) created as a result of this effort. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed. (The NAESB subcommittees have determined TRM requirements have been documented in previously submitted recommendations, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)~~Underway~~	April 8~~June 1~~, 2008	BPS, ESS/ITS

v) Business Practice Standards for ATC and AFC Calculation Methodologies to complement the NERC reliability standards created for ATC and AFC Methodologies (NERC MOD001 (Available Transfer Capability); NERC MOD028 (Network Response Available Transfer Capability); NERC MOD029 (Rated System Path Available Transfer Capability); and NERC MOD030 (Flowgate Network Response Available Transfer Capability)):

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	Item Description	Completion[1]	Assignment[2]
1.	Business practice standards to address the frequency and posting requirements for all ATC components that are complementary to the related NERC reliability standards. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: ~~Underway~~Completed. (The subcommittee determined no additional standards are required from what is already documented in the "ATC Information Link (2008 Annual Plan 2.b.vii)" recommendation and what is required for ATC postings under the previously ratified recommendation "Modifcations to WEQ-001 to comply with modifications to 18 C.F.R. 37.6 and 37.7 within Order 890 with Minor Corrections applied on February 27, 2008". Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	~~June 1~~April 23, 2008	BPS/ESS/ITS
2.	Business practice standards for data exchange for ATC modeling complementary to the related NERC reliability standards including any OASIS posting requirements to achieve the data exchange. The business practices developed to address this item will require to coordination with the NERC Order 890 reliability standards development. Status: Completed. (The NAESB subcommittees have determined the data exchange requirements have already been documented in the NERC standards, so no further action is required by NAESB. Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if additional action by NAESB is needed.)	1st Q, 2008	BPS/ESS/ITS
3.	Business practice standards that will set forth how transmission providers will post "explanations of the reason for a change in monthly and yearly ATC values on a constrained path." The standards will include a requirement that that the transmission provider posts the reason for the change in a narrative form. The posted information will include "the (1) specific events which gave rise to the change and (2) new values for ATC on that path (as opposed to all points on the network)." The business practices developed to address this item will not require to coordination with the NERC Order 890 reliability standards development. Status: Completed	1 Q, 2008	BPS/ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
	4. Business practice standards for posting on OASIS of the "underlying load forecast assumptions for all ATC calculations". The business practices developed to address this item will not require to coordination with the NERC Order 890 reliability standards development Status: Complete	1st Q, 2008	BPS/ESS/ITS
	5. Business practice standards for posting on OASIS of the "actual daily peak load for the prior day." The business practices developed to address this item will not require to coordination with the NERC Order 890 reliability standards development Status: Complete	1st Q, 2008	BPS/ESS/ITS
vi)	Business practice standards to complement NERC reliability standards for Transfer Capability in response to new NERC Supplemental SAR: Revisions to Existing Standards MOD001-MOD009, FAC12-13 This item was added as a result of the Supplemental SAR NERC created in case additional business practices are needed as a result of the work on this SAR by NERC. It does not have a cite in Order 890. This item will require coordination with the NERC Order 890 reliability standards development. Status: ~~Underway~~Completed	~~June~~ May 1, 2008	BPS, ESS/ITS
vii)	Business practice standards to set forth the procedure for input on TTC and ATC methodologies and values. (During the Order 890 NERC and NAESB joint standards development effort, it was determined that the standards contained in MOD003 should be business practice standards instead of reliability standards. NERC has requested that NAESB adopt the standards as business practices via correspondence to Ms. McQuade, NAESB President.) This item will require coordination with the NERC Order 890 reliability standards development because the language to address this item is contained within a draft standards that addresses items that are dependent on NERC deliverables, i.e., the requirements to create an "ATC Information Link" on OASIS. There is no Order 890 cite for this item. Status: Completed. (Please note that when the related NERC reliability standards are adopted, the subcommittee leadership will review to determine if modifications to these standards are needed.)	1st Q, 2008	BPS, ESS/ITS
c)	Develop version 1 business practice standards to support transparency reporting and related functions that may be required as a result of the final order. Status: ~~Not Started~~Underway~~.~~	June 1, 2008	BPS, ESS/ITS

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	Item Description	Completion[1]	Assignment[2]
3	**Develop business practices standards to improve the current operation of the wholesale electric market and develop and maintain business practice and communication standards for OASIS and Electronic Scheduling**		
a)	Develop and/or maintain business practice standards as needed for OASIS and electronic scheduling. Specific items to address include:		
i)	Develop OASIS S&CP changes to support OASIS business practices. Status: Dependent on development of OASIS business practices.	Ongoing	ESS/ITS
ii)	Network Services: Determine and develop needed business practice standards or other support is needed to support use of OASIS for Network Service transactions (R04006E). (Related to AP 2(a)(iii)) Status: Underway.	2nd Q, 2008	ESS/ITS
iii)	Registry (TSIN): Determine and develop needed business practice standards to support the registry functions currently supported by NERC (R04037). Status: Underway.		
	1) Work with the NAESB counsel to develop a confidentiality agreement	4th Q 2008	JISWG
	2) Transition the TSIN Registry from NERC to NAESB.	4th Q 2008	JISWG
	3) Review and correct the Coordinate interchange Business Practice Standard as noted during the development of the e-Tag 1.8 development process.	4th Q 2008	JISWG
v)	Document procedures used to implement the displacement/interruption terms of the Pro Forma tariff (R05019). Status: Not Started.(Related to request R04004)	4th Q, 2008	ESS/ITS
vi)	Make incremental enhancements to OASIS as an outgrowth of the NAESB March 29, 2005 conference on the future of OASIS (R05026). Status: Underway. Scoping statement completed by SRS and assignments made to BPS, ~~and~~ ESS/ITS and JISWG,.	~~2008 as determined~~	~~BPS, ESS/ITS~~
	1) Represent ALL pre-Order 888 ("grandfathered") transmission and ancillary services in current use in OASIS	2008 as determined	BPS, ESS/ITS
	2) Eliminate Masking of TSR tag source and sink when requested status is denied, withdrawn refused, displaced, invalid, declined, annulled or retracted	2008 as determined	ESS/ITS

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		Item Description	Completion[1]	Assignment[2]
	3)	Initiate standard that requires ALL historical transmission service reservations to be available for review up to a number of years in the past.	2008 as determined	ESS/ITS
	4)	Initiate standard that eliminates the disparity of posting "sensitive" information. This standard should also include procedures of user certification that allows access to this class of information. Status: Underway.	2008 as determined	JISWG
	5)	Enhance the TSR result postings to allow showing of (i) limiting transmission elements and (ii) available generation dispatch options that would allow acceptance of reservation request.	2008 as determined	ESS/ITS
	6)	Standardize the availability of TSR study result postings, eliminating practice of some Transmission Owners that charge for viewing these documents. Status: Completed. This item was completed with Recommendation (2008 AP Item 2.a.i.5, 2008 AP Item 2.a.i.6, and 2008 AP Items 2.a.ii.1-3) WEQ-001 Changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting	1st Q, 2008	ESS/ITS
vii)		Respond to issues in FERC Order No. 676 (Docket No. RM05-5-000) – NAESB WEQ Standards 001 9.7, (paragraph 51 of the order). Status: Underway. Assigned to group 4, reference 2007 WEQ AP item 2(a)(iv)(3)	2nd Q, 2008	ESS/ITS
b)		Develop and/or maintain standard communication protocols and cyber-security business practices as needed.		
i)		Address the surety assessment findings on NAESB PKI standards. Status: Complete, will be provided as a response to the U.S. DoE upon completion by the WGQ for their response to the findings.	1st Q, 2008	JISWG
ii)		Develop PKI standards for OASIS. Status: Not Started.	3rd Q, 2008	ESS/ITS
iii)		Develop PKI Standards for e-tagging. Status: Underway. eTagging items are linked to the transition of the Registry from NERC to NAESB.	2008	JISWG

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	Item Description	Completion[1]	Assignment[2]
iv)	Develop enhanced Electric Industry Registry (EIR), (R06027) Status: Underway. . The transition of the Registry from NERC to NAESB as part of this request should take place by yearend 2008.	2008	JISWG
c)	Develop needed business practice standards for organization/company codes for NAESB standards – and address current issues on the use of DUNs numbers. Status: Underway. Common code usage is linked to the transition of the Registry from NERC to NAESB.	2008	NAESB Staff with WEQ support
4	**Review and develop business practices standards to support e-Tariff program**		
	Develop business practices as needed to support the e-Tariff program including submittal of tariffs and metadata. (Docket No RM05-1-000) Status: Underway. Completed	1st Q 2008	Joint WEQ/WGQ e-Tariff Subcommittee
5	**Review and develop business practices standards to Demand Response, Demand Side Management and Energy Efficiency Programs**		
	Review and develop needed model business practices for a standardized method for quantifying benefits, savings, cost avoidance and/or the reduction in energy demand and usage derived from the implementation of demand side management and energy efficiency programs. This effort will include demand side response, energy efficiency programs and metering, including the 'curtailment service provider' program.		
a)	Develop matrix and business practice standards for measurement and verification for demand response programs in ISO/RTO footprint areas. Status: Underway	3rd Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee
b)	Develop matrix and business practice standards for measurement and verification for demand response programs in non-ISO/RTO footprint areas. Status: Underway.	3rd Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee
c)	Develop preamble for business practice standards for measurement and verification for demand response and energy efficiency programs. Status: Underway	4th Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee

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NORTH AMERICAN ENERGY STANDARDS BOARD

2008 WEQ Annual Plan Adopted by the Board of Directors on December 13, 2007

~~**Revised by the Board of Directors on March 28, 2008**~~**Proposed revisions to recommend to the Executive Committee as of May 1, 2008**

as suggested by the BPS, ESS/ITS, and SRS

	Item Description	Completion[1]	Assignment[2]
d)	Develop glossary for business practice standards Status: Underway	4th Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee
e)	Support retail development of matrix and model business practice standards for measurement and verification for demand response programs Status: Underway	4th Q, 2008	Joint WEQ/Retail DSM-EE Subcommittee
f)	Develop business practice standards to measure and verify energy reductions that are made to comply with a Renewable Portfolio Standard that included energy efficiency or a stand-alone Energy Efficiency Portfolio Standard. Status: Not Started	Phase 2	Joint WEQ/Retail DSM-EE Subcommittee
g)	Develop business practice standards to factor Demand Control and Energy Efficiency programs into reliability / supply decisions at the wholesale level for generation and transmission planning and operations. Status: Not Started.	Phase 2	Joint WEQ/Retail DSM-EE Subcommittee
h)	Develop business practice standards for cap and trade programs for green house gas Status: Not Started.	Phase 2	Joint WEQ/Retail DSM-EE Subcommittee
6	**Maintain existing body of Version 1 standards**		
a)	Review/revise WEQ 006 to remove/revise mandatory requirements for Interconnection Time Monitor (R07019) Status: ~~Not Started~~Underway.	3rd Q, 2008~~TBD~~	BPS
b)	Develop a NAESB time and inadvertent management business practice that provides additional inadvertent payback options and improved time control (R07020) Status: ~~Not Started~~Underway.	TBD	BPS
c)	Make consistency changes to Version 1.0 standards as directed by the WEQ Leadership Committee on December 12, 2007 (R08001 – BPS, ESS/ITS, R08002 - ESS/ITS, R08003 - ESS/ITS - BPS, R08004, R08005 - ESS/ITS) Status: Not Started.	TBD	BPS, ESS/ITS

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as suggested by the BPS, ESS/ITS, and SRS

	Item Description	Completion[1]	Assignment[2]
	PROVISIONAL ITEMS		
1	Develop and or modify business practices related to support of NERC effort on the NERC Resources and Transmission Adequacy and Inadvertent Interchange Data Standards BAL-006 revisions. Status: In review of the NERC development effort, Balancing Authority Controls (Project 2007-05), with Mr. Akens (TVA, NERC Drafting Team Leader) and Mr. Rodriquez (NERC Manager, Business Practice Coordination), it was determined that no changes would be required to NAESB standards. As such, NAESB leadership is not at this time determining if any development would be undertaken, which would then initiate a joint development effort. A letter to this effect was sent to NERC management. This assessment may however change as the NERC drafting team proceeds further in its development, so the provisional item remains on the 2008 WEQ Annual Plan.		
2	Develop business practice standards as requested by the regional and state advisory groups.		
3	Develop business practice standards as related to the Effectiveness Study of Competitive Wholesale Markets (Congressional Mandate), Electric Energy Market Competition Task Force, Docket No. AD05-17-000, issued by the FERC on October 13, 2005.		
4	Develop and/or maintain business practice standards to support gas-electric interdependencies • Respond to requests as received that are related to Docket No. RM05-28-000. • Respond directives related to the conclusions of the NAESB reports submitted in FERC Order No. 698, Docket Nos. RM05-5-001 and RM96-1-027.		
5	Review Market System Back-Up existing language and review of existing back-up language		
6	Review and Evaluation of whether to cutoff or put a size limit on the entities for which the standards apply		
7	Develop business practices for allocating capacity among requests received during a submittal window Order 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002 - Paragraph 805).		
8	Determine any needed NAESB action in support of the Interchange Distribution Calculator (IDC) and develop any necessary standards.		

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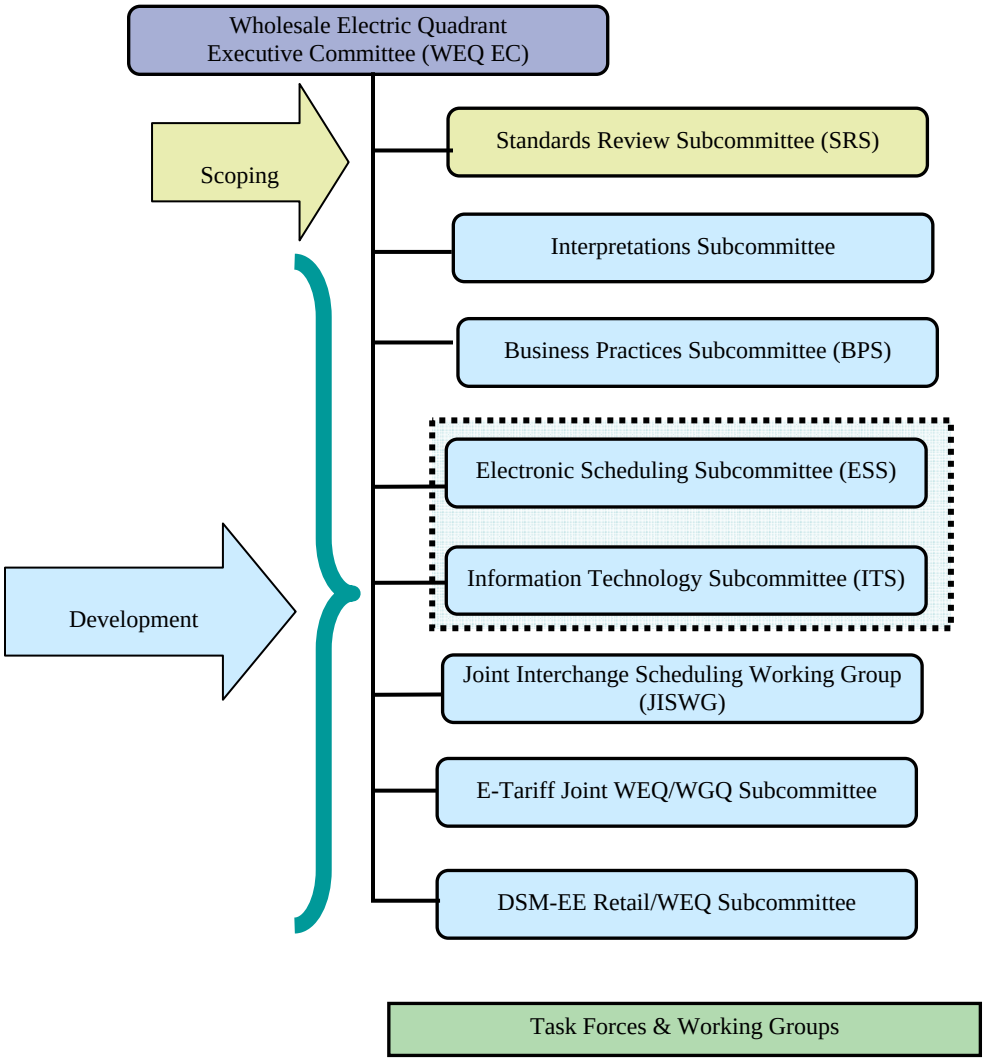

NAESB WEQ EC and Subcommittee Leadership:
Executive Committee: Kathy York (WEQ EC Chair) and Clay Norris (WEQ EC Vice Chair)
Standards Review Subcommittee: Narinder Saini, Ed Skiba
Interpretations Subcommittee: Robert Schwermann
Business Practices Subcommittee & Task Forces: Jim Busbin (TLR), Ed Skiba, ~~, J.T. Wood~~
Electronic Scheduling Subcommittee/Information Technology Subcommittee & Task Forces: Paul Sorenson, J.T. Wood, Marcie Otondo
Joint Interchange Scheduling Working Group (JISWG): Bob Harshbarger (NAESB), Jim Hansen (NERC)
e-Tariff Joint WEQ/WGQ Subcommittee (e-Tariff): Jane Daly (WEQ), Keith Sappenfield (WGQ)
DSM-EE Joint Retail/WEQ Subcommittee: Ruth Kiselewich and David Koogler (Retail), Roy True and Paul Wattles (WEQ)

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End Notes WEQ 2008 Annual Plan:

[1] Dates in the completion column are by end of the quarter for completion by the assigned committee. The dates do not necessarily mean that the standards are fully staffed to be implementable by the industry, and/or ratified by membership. If one item is completed earlier than planned, another item can begin earlier and possibly complete earlier than planned. There are no begin dates on the plan.

[2] The assignments are abbreviated. The abbreviations and committee structure can be found at the end of the annual plan document.

[3] For additional information, please see: http://www.naesb.org/pdf3/weq_bps100407w4.ppt for Phase II changes and http://www.naesb.org/pdf2/weq_bps070907w4.doc for Phase III changes.

[4] Joint Development Procedure is to be used by the NERC TLR Drafting Team and NAESB BPS.

[5] [5] For additional information, please see comments submitted by PJM and MISO for this Annual Plan Item: http://www.naesb.org/pdf3/weq_aplan102907w1.pdf.

[6] Joint Development Procedure is to be used by the NERC TLR Drafting Team and NAESB BPS.

[7] The June 1, 2008 dates included in this Annual Plan Item are assigned as a result of FERC extending deadlines to both NERC and NAESB on ATC related Order No. 890 items.

NORTH AMERICAN ENERGY STANDARDS BOARD

WEQ Executive Committee Meeting –Meeting Materials
May 13, 2008

TAB 8

Board Updates, Other Quadrant Efforts and Regulatory Updates

- Update materials are provided for:
  - Board of Directors – March 27, 2008 Draft Meeting Minutes with discussion on segments and blocks
  - Wholesale Gas and Retail key activities – WGQ Annual Plan, Retail Annual Plan, NAESB Bulletin
  - Regulatory Updates: summary report
- No action is expected of the WEQ EC.
- The materials in Tab 8 correspond to agenda item 8.

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April 18, 2008

TO: NAESB Board Members, Posting for Interested Industry Participants

FROM: Cory Galik, Meeting Administration/Project Manager

RE: Draft Minutes from the NAESB Board of Directors Meeting – March 27, 2008

NORTH AMERICAN ENERGY STANDARDS BOARD
NAESB BOARD OF DIRECTORS MEETING
March 27, 2008 – Marriot Houston Intercontinental Hotel - Houston, TX
Draft Minutes

1. Administration and Welcome

Mr. Desselle welcomed the Board members and guests in the room and on the phone. Mr. Booe read the antitrust guidelines. Ms. McQuade read the roster of the Board members and quorum was established.

The Board members reviewed the draft agenda included on page 14 behind tab 2 of the Board book. Mr. Ellsworth added Advisory Council to the list of new business and moved, seconded by Mr. Minneman, to adopt the agenda as revised. The motion passed without objection. The Board members reviewed the minutes from the Board meeting on December 13, 2007 included on page 16 behind tab 3 of the Board book. Mr. Minneman moved, seconded by Mr. Kruse, to adopt the minutes as drafted. The motion passed without objection. The final minutes are posted on the NAESB Board page: http://www.naesb.org/pdf3/bd121307fm.doc.

2. Reports from Board Committees

Resources Committee: Next, Mr. Brown provided an update of the work of the Resources Committee. The report was included behind tab 4 of the Board book, beginning on page 25. Mr. Brown noted that the work of the Resources Committee helped gain a net 2 new members. Potential areas for new membership include Demand Response Providers and Wind Energy Providers. There are open board seats in the Retail Electric, Retail Gas and Wholesale Electric Quadrants. Individuals will be contacted by Resources Committee members to determine their interest level in the vacancies. Ms. McQuade and Mr. Boswell will work on a copyright reminder letter

Ad Hoc Committee on Segment Blocks: Mr. Desselle reviewed the meeting held a few weeks ago. The review was included on page 55 behind tab 4 of the Board book. The group proposes changes to the governance documents to preclude segment blocks in under-populated segments (at least 50% of the seats in a segment for either the Board or EC are vacant). Segment blocks are an appropriate tool for NAESB but should rarely be utilized and not part of a routine voting strategy. When a segment block is expected at the Executive Committee level, board members of that segment will be contacted to determine if steps can be taken that would prevent a single segment block. Facilitators, which may be provided by the FERC as they have done so in the past, may also be requested of the Managing Committee to prevent single segment blocks. FERC staff assistance may be requested if needed to overcome technical questions. The board may be asked to take action revising governance documents at the June board meeting that are reflective of the ad hoc group's decisions.

3. Updates on specific standards development efforts

Next, the Board reviewed the progress of several standards development efforts underway.

WEQ and WGQ: e-Tariff Progress: Mr. Sappenfield provided the update for the e-Tariff efforts. The e-Tariff report was included behind tab 5, beginning on page 61 of the Board book. At the February 29 EC meeting the e-Tariff standard was voted on and passed. There were sixteen meetings since February 2007 and over 300 people worked on the project. FERC staff was also actively involved. Mr. Sappenfield thanked all those that helped,

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especially Ms. Daly, Ms. Davis, Mr. Burden and Mr. Brooks. The ratification is now underway and should complete on April 4. The standards will be filed with the FERC after the ratification process completes.

WEQ: FERC Order No. 890, Coordination with NERC, ATC deliverable deadlines, OASIS change progress: Ms. York provided the update of the NAESB standards development on FERC Order No. 890. The FERC Order No. 890 information begins on page 79 of the Board book behind tab 5. Ms. York noted that the ESS/ITS and BPS have met 17 times in the first quarter of the year. She thanked Mr. Skiba, Mr. Wood, Mr. Sorenson and Ms. Otondo and the team that has been meeting to get the work done. The WEQ EC has taken several steps to provide support for the subcommittees in their efforts to meet the FERC deadline of August 7 for ATC related business practices. The steps include practices for running efficient meetings, addressing repetitive comments, addressing late participants to the process who would request that issues be revisited, management tools including conceptual agreements on issues, maintenance of lists of motions and parking lots for issues. Also to be implemented are single topic conference calls to address specific proposed standards, and conference calls prior to the EC meetings to brief EC members on the issues and better prepare them to vote. Since that time, four recommendations have been voted out of the subcommittee. Ms. York pointed out that on page 79 of the Board book behind tab 5 is a letter that the subcommittee is attaching to any standards that needs close coordination with NERC. The letter is included because there may be delay on NERC delivery of products that could impact the NAESB August deadline. With the approach taken, we would proceed on through ratification, but would not file work products until we have been able to vet them against the NERC complementary reliability standards to determine if there are any adjustments to be made. Mr. Skiba stated that in addition to FERC Order No. 890, FERC has issued FERC Order No. 890-A. There is a mid-July deadline on tagging conditional firm that ESS/ITS has as a high priority. The subcommittee is working on these development projects linked to the deadlines and has made much progress in the last few months based on the guidance received from the Executive Committee. While the program is aggressive, we expect to make the dates.

WGQ: FERC Order No. 698 approach, schedule and progress: Mr. Novak provided the update of the work of the WGQ Business Practices Subcommittee to address FERC Order No. 698. Of the three topics involved in this order, 7b (Alternate Receipt Points Upstream of or an Alternate Delivery Point Downstream of a Point of Constraint) and 7a (index-based capacity release) have been voted out of the subcommittee, is now in industry comment and will be taken up by the EC for vote in May. The last topic, 7c (intraday nomination timeline) has several proposals. Ms. Van Pelt stated that in the last subcommittee meeting a list of criteria was developed to use to compare against the various models. NAESB has also received several state commission letters of support for building additional flexibility into the intraday nomination timeline through the inclusion of more intraday periods. Several sets of meetings have been scheduled to further address the intraday nomination timeline effort.

WEQ and Retail: DSM/EE efforts: Next, Mr. Koogler provided an overview of the DSM/EE efforts. The materials were included behind tab 5, beginning on page 146 of the Board book. The subcommittee has focused on demand response programs and has deferred EE to a later phase. Four sub-teams have been created (Preamble, Glossary, Wholesale Matrix and Retail Matrix). The Retail Matrix group has developed a work plan and is providing data into a matrix that describes DR programs operational or planned for the retail market, with characteristics of the programs highlighted with measurement and verification specifications that may be suitable for standards development. The data for the matrix has been gathered through phone/web interviews. The effort will continue through the second quarter on further data collection in the matrix, after which analysis of the findings should provide a basis for the development of retail standards in the third and fourth quarters. On the wholesale matrix effort, the matrix development is proceeding on a faster path and indeed has provided a basis from which the retail effort has grown. To date, more than 40 programs have been described to the wholesale matrix in five major categories with multiple M&V characteristics for each. The matrix should be the mechanism from which the areas for standards development can be identified. It is expected that in the third quarter, the group will begin to review draft wholesale M&V standards for the DR programs in place and administered by ISOs/RTOs. The wholesale matrix group is leading the retail group by at least one quarter. The ISO-RTO Council is planning a technical session in DC on April 21, during which much of the work on the wholesale side will be unveiled and discussed. Commissioner Wellinghoff is opening the session. Several meeting dates have been arranged to continue the

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standards development work, and the preamble and glossary efforts will be considered when the standards development for the two matrices is further along. To summarize the importance of this work on both the wholesale and retail fronts, Mr. Koogler noted that the North Carolina has taken regulatory action to support the NAESB DSM-EE standards, which can be found in NCUC Rulemaking Order, Docket No. E-100, Sub 113.

WGQ Gas Quality: Mr. Buccigross reviewed Gas Quality standards efforts found on page 166 behind tab 5 of the Board book. Request R06008 asked for modification of two NAESB standards, WGQ Standard No. 4.3.90 and WGQ Standard 4.3.92. Both changes were made and passed by the Executive Committee. Two new proposed standards, WGQ Standard 4.3.x1 and WGQ Standard 4.3.x3 failed to pass the Executive Committee due to a segment block. The recommendation, along with the modified standards, will be provided to the FERC. The FERC issued an order establishing a hearing in Docket no. RP07-504-000 regarding gas quality and tariff filings. A copy of the order can be found on page 171 behind tab 5 of the Board book. The order asked NAESB to develop additional gas quality standards. From the order, language was extracted to be added to the WGQ Annual Plan -- "develop a uniform set of standards regarding the posting of rapidly changing gas information applicable to those pipelines which are required under their tariffs to do so." The motion to amend the 2008 WGQ Annual Plan passed unanimously. This item was assigned to the WGQ Business Practice Subcommittee.

4. Executive Committee Reports

Ms. York provided the review of the Wholesale Electric Quadrant and reviewed the proposed changes to the WEQ 2008 Annual Plan. Ms. Burnett moved, seconded by Ms. Crockett, to adopt the revisions to the plan as highlighted by Ms. York. The motion passed without objection. Mr. Sappenfield reviewed the eTariff item that has been completed in the Wholesale Gas Quadrant. Mr. Sappenfield moved, seconded by Ms. Burnett, to adopt the revisions to the plan. The motion passed unanimously. Mr. Novak provided the review of the work of the Retail Quadrants. No changes were made to the retail plan at this time. There was a request that companies provide technical participation so the retail effort can proceed as planned to publish version 1.1 including the Texas Registration Model.

5. Membership and Financial Reports

Ms. McQuade reviewed the membership report included on page 222 of the Board book, behind tab 7. The membership profile notes a net increase of 2 members to date in 2008. On page 224 a list of the companies that have joined and those that have elected to resign their memberships was included. There were no questions regarding the membership report. It was noted that we will probably see some membership decline in the next few months as is typical but should make it up later in the year. The 2007 budget and financials for year-end were reviewed. The organization had a net profit for 2007 of $20,644.85, which was applied to the negative retained earnings that had accumulated when GISB transitioned to NAESB. Each year we buy down the negative retained earnings. For 2007 to 2008, the retained earnings moved from ($276,538.11) to ($255,893.26). The 2008 Financial Report and budget accrued as of January 31, 2008 are included in the Board book, beginning on page 234 behind tab 7. Ms. McQuade noted that the budget increased this year based on the expectation that there will be an increase in membership. Expenses are increasing as the number of meetings increases. Nonetheless, with only one month of data at hand and no major unanticipated changes, the estimated expenses and income do not reflect any items that were not already included in the budget.

6. Plan for March 2008 Board Meeting

Ms. McQuade stated that the June 2008 Board meeting is scheduled for June 26 at the Wyndam Greenspoint in Houston. The Board members were asked to contact her if they had any agenda items that should be addressed. The June Board meeting will be the meeting of the members as well.

7. Old and New Business

Mr. Ellsworth provided a review of the NAESB Advisory Council meeting held in Washington, DC during the NARUC winter meetings in February 2008. There were 32 members present. It was a good opportunity to update

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state commissioners and other government staff on NAESB activities as well as encourage commissions to join and become active in NAESB. The details were provided on page 239, behind tab 8 of the Bard book. Three meetings were noted by Ms. McQuade. She met with NARUC staff to urge their participation in standards development areas of interest to their constituency, which includes FERC Order No. 698, gas quality and DSM-EE. On March 27 and 28, Ms. McQuade and Mr. Desselle met with the FERC commissioners to discuss annual plans and progress made on key development efforts: FERC Order No. 890, FERC Order No. 698, eTariff, gas quality and DSM-EE. On March 20, Ms. McQuade and NERC staff met to continue an emphasis on coordination – specifically for Order no. 890, but also for other areas. Ms. McQuade also reminded everyone of the monthly update calls. It is an easy way to stay up to date with what NAESB is working on.

8. Adjourn

Mr. Templeton moved to adjourn. The meeting adjourned at 11:52 AM Central.

9. Board Attendance (Vacancies Omitted)

Wholesale Gas Quadrant

PRODUCERS SEGMENT		**ATTENDANCE:**
Jay Ellzey	Vice President Commercial Operations, Chevron Natural Gas	
William T. Benham	Vice President – Regulatory Affairs, BP Energy Company	
Keith Sappenfield	Regional Director – US Regulatory Affairs, EnCana Oil & Gas (USA) Inc.	In Person
Marty Patterson	Vice President – Commercial Operations, Foothills Energy Ventures LLC	In Person
Pete Frost	Director - Regulatory Affairs, ConocoPhillips Gas and Power Marketing	In Person
PIPELINE SEGMENT		
Jim Goldmann	Vice President - Transportation Services and Development, Alliance Pipeline LP	Phone
Bill Grygar	Vice President, Panhandle Eastern Pipe Line	
Susanna B. Barry	Vice President – Commercial Operations, Tennessee Gas Pipeline Company	In Person
Anne Bomar	Vice President, Dominion	
Richard Kruse	Senior Vice President, Spectra Energy Transmission	In Person
LOCAL DISTRIBUTION COMPANY (LDC) SEGMENT		
Clifton Olson	Vice President of Supply and Transmission, Energy East Corporation	Phone
Adrian Chapman	Vice President, Regulatory Affairs & Energy Acquisition, Washington Gas	In Person
Amy Hamilton	Vice President, Regulatory Affairs & Energy Acquisition, Washington Gas	In Person
Mike Novak	Asst. General Manager, National Fuel Gas Distribution Corporation	Phone
Lee Stewart	Senior Vice President, Gas Transmission, Southern California Gas Company	In Person
END USERS SEGMENT		
Valerie Crockett	Senior Energy & Policy Specialist, Tennessee Valley Authority	In Person
Timothy W. Gerrish	Director of Origination-Energy Marketing and Trading, Florida Power & Light	In Person
Tina Burnett	Natural Gas Resources Administrator, The Boeing Co.	In Person
Lori-Lynn C. Pennock	Senior Fuel Supply Analyst, Salt River Project	In Person
Jim Templeton	Principal, Comprehensive Energy Services	In Person

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SERVICES SEGMENT		
John Bretz	Vice President - Gas Marketing, Anadarko Energy Services Company	
Jim Buccigross	Vice President Energy Industry Practice, Group 8760 LLC	Phone
Bill Hebenstreit	Manager – Contract Administration, Cheniere Marketing, Inc.	In Person
Rusty Braziel	Managing Director, Bentek Energy, LLC	
Suzanne Calcagno	Director, Regulatory Compliance, UBS Energy, LLC	

Retail Electric Quadrant

DISTRIBUTORS SEGMENT		
David Koogler	Director – State Regulation, Dominion Virginia Power (SERC NERC Region)	In Person
Dennis Derricks	Director Regulatory Policy and Analysis, Integrys Energy Services, Inc.	Phone
Ruth Kiselewich	Director Special Projects and Supplier Services, Baltimore Gas & Electric Company (MAAC NERC Region)	Phone
Debbie McKeever	Market Advocate, Oncor	In Person
END USERS SEGMENT		
Sonny Popowsky	Consumer Advocate, Pennsylvania Office of Consumer Advocate	
SERVICE PROVIDERS SEGMENT		
Jim Minneman	Director of Business Services, PPL Solutions LLC	In Person
J Cade Burks	President, EC Power	In Person

Wholesale Electric Quadrant

TRANSMISSION SEGMENT		SUBSEGMENT:	ATTENDANCE
Dan Klempel	Director Transmission Regulatory Compliance, Basin Electric Power Cooperative	Muni/Coop	
John E. Lucas	Director - Transmission Policy and Services, Southern Company Transmission	IOU	Phone
Jerry Smith	Alliance/Partnership Manager, Arizona Public Service Co.	IOU	In Person
Jill Horswell	Director – FERC and RTO Internal Affairs, Allegheny Energy, Inc	at large	In Person
Terri Grabiak	Director – FERC and RTO Internal Affairs, Allegheny Energy, Inc.	at large	Phone
Michael Wells	Director – Market-Operations Interface, WECC	at large	
GENERATION SEGMENT			
Curtis Winterfeld	Vice President of Power Marketing, Deseret Generation & Transmission Cooperative	Muni/Coop	
Belinda Thornton	Senior Manager – Real Time Trading, Tennessee Valley Authority	Fed/State/Prov.	
Lou Oberski	Director – Electric Market Policy, Dominion Resources Services, Inc.	IOU	
Charles W. Severance	Manager – Supply & Wholesale Services, Integrys Energy Services, Inc.	IOU	In Person
Gloria Ogenyi	Vice President Energy Policy, Conectiv Energy Supply, Inc.	Merchant	
Ron Mucci	Manager – Regulatory Affairs, Williams Power Company	At-Large	
MARKETERS/BROKERS SEGMENT			
Roy True	Manager of RTO Market Development, ACES Power	Muni/Coop	In Person

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	Marketing		
Jeff Ackerman	Manager, Colorado River Storage Project Energy Management and Marketing Office, Western Area Power Administration	Fed/State/Prov.	In Person
Michael Grim	Director of Markets and Regulation, Luminant	Not IOU Affiliated	
Jim Cashin	Senior Manager of Policy, Electric Power Supply Association (EPSA)	at large	
Sam Forrest	Vice President, Energy Marketing and Trading, Florida Power & Light	IOU	In Person
R. Scott Brown	Vice President and Director, Exelon Generation Power Team	IOU	Phone
Rick Smead	Director, Navigant Consulting, Inc.	At-Large	
DISTRIBUTION/LOAD SERVING ENTITIES (LSE) SEGMENT		**SUBSEGMENT:**	
Arthur G. Fusco	Vice President and General Counsel, Central Electric Power Cooperative Inc.	Muni/Coop	Phone
Barry R. Lawson	Manager-Power Delivery, National Rural Electric Cooperative Association	Muni/Coop	Phone
Leonard Haynes	Executive Vice President – Supply Technologies, Renewables and Demand Side Planning, Southern Company Generation	IOU	Phone
Frank Johnson	Senior Vice President Electric Transmission and Distribution, Consumers Energy	IOU	
Thomas Burgess	Director – FERC Compliance, FirstEnergy Service Company	at large	In Person
Joe Hartsoe	Managing Director – Federal Policy, American Electric Power Service Corp.	at large	Phone
Bruce Ellsworth	New York State Reliability Council	At-Large	In Person
END USERS SEGMENT			
Thomas G. Dvorsky	Director of the Office of Electricity, Gas and Water at the New York State Department of Public Service	Regulator	
Michehl Gent	Open Access Technology International, Inc.	At-Large	
INDEPENDENT GRID OPERATORS/PLANNERS			
Michael Desselle	Vice President Process Integrity, Southwest Power Pool		In Person
Ray Giuliani	Vice President Market Operations, Electric Reliability Council of Texas (ERCOT)		In Person
Kevin Kirby	Vice President Market Operations, ISO New England, Inc.		In Person
Rana Mukerji	Vice President Market Structures, New York Independent System Operator, Inc. (NYISO)		Phone
Andy Ott	Vice President Markets, PJM Interconnection		Phone
William Phillips	Vice President Interregional Coordination & Policy, Midwest ISO (MISO)		
Don Tench	Director Planning & Assessments, Independent Electricity System Operator (IESO)		In Person

Retail Gas Quadrant

DISTRIBUTORS SEGMENT		
Alonzo Weaver	Vice President of Engineering and Operations, Memphis Light, Gas & Water Division	
William Bourbonnais	Vice President – Transmission, Wisconsin Public Service	

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Home Page: www.naesb.org

Ralph Cleveland	Corporation Senior Vice President – Engineering and Operations, AGL Resources, Inc.	
SERVICE PROVIDERS SEGMENT		
Leigh Spangler	President, Latitude Technologies Inc.	
Dave Darnell	President & CEO, Systrends USA	Phone
Greg Lander	Principal, Commerce Energy Group	

11. Other Attendance

Name	Organization	Attendance
Jonathan Booe	NAESB	In Person
Kathryn Burch	Spectra Energy Transmission	In Person
Christopher Burden	Williams Gas Pipeline	In Person
Deonne Cunningham	NAESB	In Person
Ed Davis	Entergy	In Person
Brenda Foster	Preferred Legal	In Person
Cory Galik	NAESB	In Person
Angela Gonzales	NAESB	In Person
Mark Gracey	Tennessee Gas Pipeline	In Person
Dona Gussow	FPL	Phone
Bill Lohrman	FERC	Phone
Rae McQuade	NAESB	In Person
Susan Munson	ERCOT	In Person
Marty Patterson	Foothills Energy Ventures	In Person
Marjorie Perlman	Energy East	Phone
Denise Rager	NAESB	In Person
Lisa Simpkins	Constellation Energy	In Person
Ed Skiba	Midwest ISO	In Person
Richard Smith	ExxonMobil	In Person
Veronica Thomason	NAESB	In Person
Larry Williford	OnCor	In Person
Eric Winkler	ISO New England	In Person
JT Wood	Southern Company	Phone
Charles Yeung	SPP	In Person
Kathy York	Tennessee Valley Authority	In Person

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NORTH AMERICAN ENERGY STANDARDS BOARD

2008 WGQ Annual Plan Adopted by the NAESB Board of Directors on March 27, 2008

	Item Description	Completion[1]	Assignment[2]
Damage Reporting for Natural Gas Pipeline Facilities			
1	Review and develop standards as appropriate to support posting of information as noted in Docket No. RM06-18-000, Order No. 682 and Docket No. RM06-18-001, Order No. 682-A. Review transmission line damage reporting to identify commonality and apply as appropriate. Status: Not Started.	4th Q 2008	BPS
Electronic Delivery Mechanisms and Related Activities			
2	Develop or amend WGQ technical standards, as appropriate, to address to the DoE Sandia National Laboratories 2006 surety assessment findings and recommendations. Status: Underway.	1st Q, 2008	BPS/EDM
Contracts Activities			
3	Update ISDA Gas Annex to correspond to the updated NAESB Base Contract for Sale and Purchase of Sale of Natural Gas, dated September 5, 2006. Status: Underway.	1st Q, 2008	Contracts
Gas-Electric Interdependency			
4	Respond to directives of FERC Order No. 698 issued 6-25-07, Docket Nos. RM05-5-001 and RM96-1-027 as related to the NAESB reports submitted in Docket No. RM05-28-000:		
	a. ¶ 56 of Order No. 698: "… Under the Commission regulations, the releasing shipper is responsible for clearly setting out the terms and conditions of the release and that would include the means for implementing the formula rate. This is also an issue on which NAESB can develop standards to ensure that such releases can be processed quickly and efficiently." (emphasis added)		
	i.) Develop business practice standards to address the threshold questions of ¶ 56 of Order No. 698: Status: Underway.	2nd Q, 2008	BPS
	ii.) Prepare fully staffed recommendation Status: Not started, dependent upon conclusion of Item 5(a)(i) and review and consideration of item 5(a)(i) by the WGQ EC.	TBD	BPS
	b. ¶ 63 of Order No. 698: "The Commission is not modifying its requirement for within-the-path scheduling as adopted in Order No. 637. The example posited by NAESB appears consistent with the within-the-path scheduling concept and with pipeline proposals that have been accepted. It would not be appropriate for the Commission here to try to provide generic clarification to cover all possible proposals by pipelines for according flexibility to shippers. These proposals will have to be judged on an individual basis. In addition, NAESB can consider through its consensus process possible standards for according increased receipt and delivery point flexibility."(emphasis added)		

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NORTH AMERICAN ENERGY STANDARDS BOARD

2008 WGQ Annual Plan Adopted by the NAESB Board of Directors on March 27, 2008

	Item Description	Completion[1]	Assignment[2]
	i.) Develop business practice standards to address the threshold questions of ¶ 63 of Order No. 698: Status: Underway.	2nd Q, 2008	BPS
	ii.) Prepare fully staffed recommendation Status: Not started, dependent upon conclusion of Item 5(b)(i) and review and consideration of item 5(b)(i) by the WGQ EC.	TBD	BPS
	c. ¶ 69 of Order No. 698: "As we stated in the NOPR, the Commission has recognized the interest of interruptible shippers in achieving business certainty by making the last intra-day nomination opportunity one in which firm nominations do not bump interruptible nominations. However, within the confines of current Commission policy, NAESB should actively consider whether changes to existing intra-day schedules would benefit all shippers, and provide better provide for coordination between gas and electric scheduling. In addition, the NAESB nomination timeline establishes only the minimum requirement to which pipelines must adhere..."(emphasis added)		
	i.) Develop business practice standards to address the threshold questions of ¶ 69 of Order No. 698: Status: Underway.	3rd Q, 2008	BPS
	ii.) Prepare fully staffed recommendation Status: Not started, dependent upon conclusion of Item 5(c)(i) and review and consideration of item 5(c)(i) by the WGQ EC.	TBD	BPS
Capacity Release			
5	Review capacity release transactions upload and related responses to determine suitability for EDI. Status: Not started, action pending submittal of request and process for request assignment.	3rd Q, 2008	BPS
Review and develop business practices standards to support e-Tariff program			
6	Develop business practices as needed to support the e-Tariff program including submittal of tariffs and metadata. (Docket No RM05-1-000) Status: Complete.	1st Q, 2008	Joint WEQ/WGQ e-Tariff
Customer Security Administration			
7	Review and develop standards as appropriate to support Customer Security Administration Standards (Comment Submittal, 10-29-07) Status: Not started, action pending submittal of request and process for request assignment.	TBD	TBD
Gas Quality Reporting			
8	Respond to directives of FERC Docket No. RP07-504-000: ¶ 10 "… develop a uniform set of standards regarding the posting of rapidly changing gas quality information applicable to those pipelines which are required by their tariffs to do so." (Docket No. RP07-504-000) Status: Not started	4th Q, 2008	BPS

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NORTH AMERICAN ENERGY STANDARDS BOARD

2008 WGQ Annual Plan to be Presented to the NAESB Board of Directors on March 27, 2008l

Item Description	Completion	Assignment
Program of Standards Maintenance & Fully Staffed Standards Work		
Business Practice Requests	Ongoing	Assigned by the EC[3]
Continue review against plan for migration to ANSI ASC X12 new versions as needed and coordinate such activities with DISA.	Ongoing	ANSI X12 Subcommittee
Information Requirements and Technical Mapping of Business Practices	Ongoing	Assigned by the EC[4]
Ongoing Interpretations for Clarifying Language Ambiguities	Ongoing	Assigned by the EC[4]
Ongoing Maintenance of Code Values and Other Technical Matters	Ongoing	Assigned by the EC[4]
Provisional Activities		
Respond to requests as received that are related to Docket No. AD06-11-000 (Market Transparency Reporting).		

Notes: (a) Priority is given to action items that are carry-overs from the 2007 Annual Plan.
(b) Any new activity should be preceded by a request from the submitter after which the annual plan will be revisited. The provisional items would only be addressed after a request is submitted or an order is issued by the FERC.

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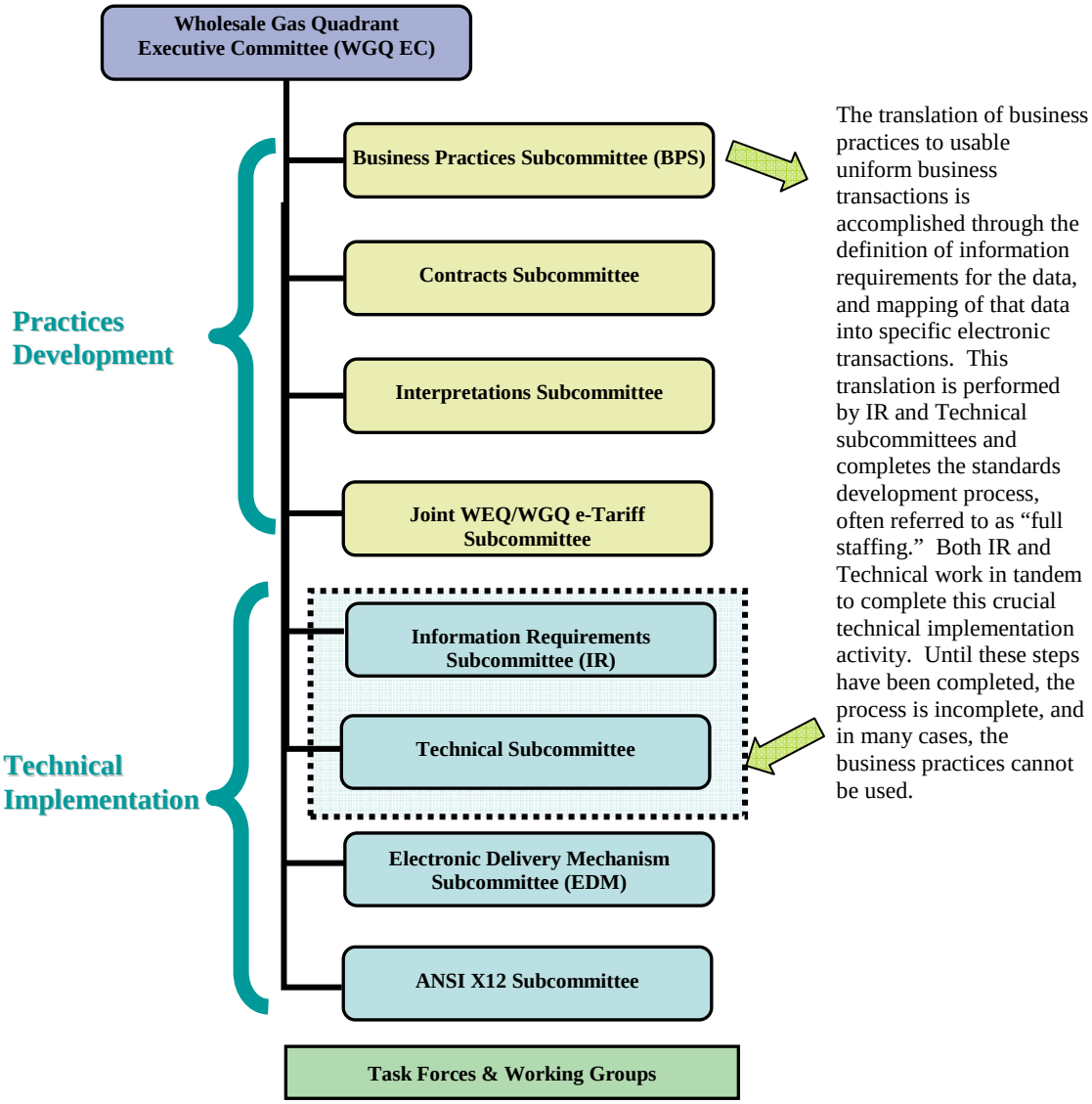

The translation of business practices to usable uniform business transactions is accomplished through the definition of information requirements for the data, and mapping of that data into specific electronic transactions. This translation is performed by IR and Technical subcommittees and completes the standards development process, often referred to as "full staffing." Both IR and Technical work in tandem to complete this crucial technical implementation activity. Until these steps have been completed, the process is incomplete, and in many cases, the business practices cannot be used.

NAESB 2008 WGQ EC and Subcommittee Leadership:

Executive Committee: Jim Buccigross, Chair and Mike Novak, Vice-Chair
Business Practices Subcommittee: Kim Van Pelt, Valerie Crockett, Dolores Chezar and Richard Smith
Information Requirements Subcommittee: Dale Davis
Technical Subcommittee: Kim Van Pelt
Contracts Subcommittee: Keith Sappenfield
Electronic Delivery Mechanism Subcommittee: Leigh Spangler, Christopher Burden
Interpretations Subcommittee: Paul Love
Joint WEQ/WGQ e-Tariff Subcommittee: Keith Sappenfield, Jane Daly

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End Notes WGQ 2008 Annual Plan:

[1] Dates in the completion column are by end of the quarter for completion by the assigned committee. The dates do not necessarily mean that the standards are fully staffed to be implementable by the industry, and/or ratified by membership. If one item is completed earlier than planned, another item can begin earlier and possibly complete earlier than planned. There are no begin dates on the plan.

[2] The assignments are abbreviated. The abbreviations and committee structure can be found at the end of the annual plan document.

[3] The EC assigns maintenance of existing standards on a request-by-request basis.

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NORTH AMERICAN ENERGY STANDARDS BOARD
2008 ANNUAL PLAN for the RETAIL GAS and ELECTRIC QUADRANTS
Adopted by the NAESB Board of Directors on December 13, 2007

	Item Number & Description[1]	Completion[2]	Assignment[3]
1	Electronic Retail Billing.		
	Develop Technical Electronic Implementation Standards – Electronic Retail Billing	1st Q 2008	TEIS
	Status: Underway		
2	Customer Enrollment, Drop and Account Information Change		
	a. Develop information requirements for submitting and receiving, processing and fulfilling a customer's request to enroll with or leave a supplier (including suppliers dropping customers) and for maintaining current customer account information, and for notifying affected parties.	1st Q, 2008	IR
	Status: Underway		
	b. Develop Technical Electronic Implementation Standards – Customer Enrollment, Drop and Account Information Change,	2nd Q 2008	TEIS
	Status: Underway		
3	Customer Enrollment, Drop and Account Information Change Using a Registration Agent		
	Develop practices when using a Registration Agent for submitting and receiving, processing and fulfilling a Customer's request to enroll with or leave a Supplier (including Suppliers dropping Customers) and for maintaining current Customer account information, and for notifying affected parties.		
	i) Customer Enrollment	4th Q 2007[1]	Texas Task Force/ BPS
	Status: Projected to be completed 4th Q 2007		
	ii) Customer Drop	1st Q 2008	Texas Task Force/ BPS
	Status: Underway		
	iii) Account Information Change	2nd Q 2008	Texas Task Force/ BPS
	Status: Not Started		
4	Review and Discuss application of any other existing model business practices for the Registration Agent model	3rd Q 2008	BPS
5	Customer Inquiries		
	Develop procedures for responding to customer inquiries directed to Distributors and/or Suppliers and for notification of the other party.	4th Q 2008	BPS
	Status: Not Started. Delayed to 2008 for completion because the registration agent model is separate from customer enrollments.		
6	Develop NAESB Certification checklist criteria for Retail Quadrants to be used in the NAESB Certification Program.	2009	TEIS
	Status: Not Started. Dependent upon publication of Version 1.1 at a minimum, but more dependent upon completion of Customer Choice efforts.		

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Adopted by the NAESB Board of Directors on December 13, 2007

	Item Number & Description[1]	Completion[2]	Assignment[3]
7	Address issues raised in the Department of Energy's Sandia National Laboratories on NAESB technical standards and respond to the surety assessment findings and recommendations. Status: Underway	1st Q 2008	TEIS
8	Review and develop needed model business practices for a standardized method for quantifying benefits, savings, cost avoidance and/or the reduction in energy demand and usage derived from the implementation of demand side management and energy efficiency programs. This effort will include demand side response, energy efficiency programs and metering, including the 'curtailment service provider' program. Status: Underway	2008	Joint WEQ/Retail DSM Subcommittee
	a. Develop matrix and business practice standards for measurement and verification for demand response programs in ISO/RTO footprint areas. Status: Underway	3rd Q, 2008	Joint WEQ/Retail DSM Subcommittee
	b. Develop matrix and business practice standards for measurement and verification for demand response programs in non-ISO/RTO footprint areas. Status: Underway	3rd Q, 2008	Joint WEQ/Retail DSM Subcommittee
	c. Develop preamble for business practice standards for measurement and verification for demand response and energy efficiency programs. Status: Underway	4th Q, 2008	Joint WEQ/Retail DSM Subcommittee
	d. Develop glossary for business practice standards Status: Underway	4th Q, 2008	Joint WEQ/Retail DSM Subcommittee
	e. Support retail development of matrix and model business practice standards for measurement and verification for demand response programs Status: Underway	4th Q, 2008	Joint WEQ/Retail DSM Subcommittee
	f. Develop business practice standards to measure and verify energy reductions that are made to comply with a Renewable Portfolio Standard that included energy efficiency or a stand-alone Energy Efficiency Portfolio Standard. Status: Not Started	Phase 2	Joint WEQ/Retail DSM Subcommittee
	g. Develop business practice standards to factor Demand Control and Energy Efficiency programs into reliability / supply decisions at the wholesale level for generation and transmission planning and operations. Status: Not Started.	Phase 2	Joint WEQ/Retail DSM Subcommittee
	h. Develop business practice standards to support cap and trade programs for green house gas. Status: Not Started.	Phase 2	Joint WEQ/Retail DSM Subcommittee

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Adopted by the NAESB Board of Directors on December 13, 2007

Item Number & Description[1]	Completion[2]	Assignment[3]
Program of Standards Maintenance & Fully Staffed Standards Work[4]		
Business Practice Requests	Ongoing	Assigned by the EC
Information Requirements and Technical Mapping of Business Practices	Ongoing	Assigned by the EC
Ongoing Interpretations for Clarifying Language Ambiguities	Ongoing	Assigned by the EC
Ongoing Maintenance of Code Values and Other Technical Matters	Ongoing	Assigned by the EC
Ongoing Development and Maintenance of Definitions	Ongoing	Glossary

Provisional Activities

Joint Effort:

Supplier Certification: Develop practices for Distribution Companies to register/certify new Suppliers when they seek to begin doing business in the Distribution Company's service area.

Modify TPA as necessary.

Review security standards as may be deemed necessary, such as Public Key Infrastructure (PKI).

Review existing body of model business practices for consistency and develop or modify model business practices as needed.

Retail Electric Quadrant Effort Only:

Retail Meter Data Validation, Editing & Estimating: Develop procedures for insuring the integrity and validity of retail customer metering data that is needed by utilities and suppliers for billing, etc. Issues related to unbundled or competitive metering are not to be considered.

Settlement Process: Reconcile energy schedules and energy delivered by suppliers within a given market. Note: will need to be coordinated with the WEQ for the REQ.

Retail Gas Quadrant Effort Only:

Examine Wholesale Gas Quadrant Non-EDM Standards for applicability to retail business practices.

Settlement Process: Reconcile energy schedules and energy delivered by suppliers within a given market.

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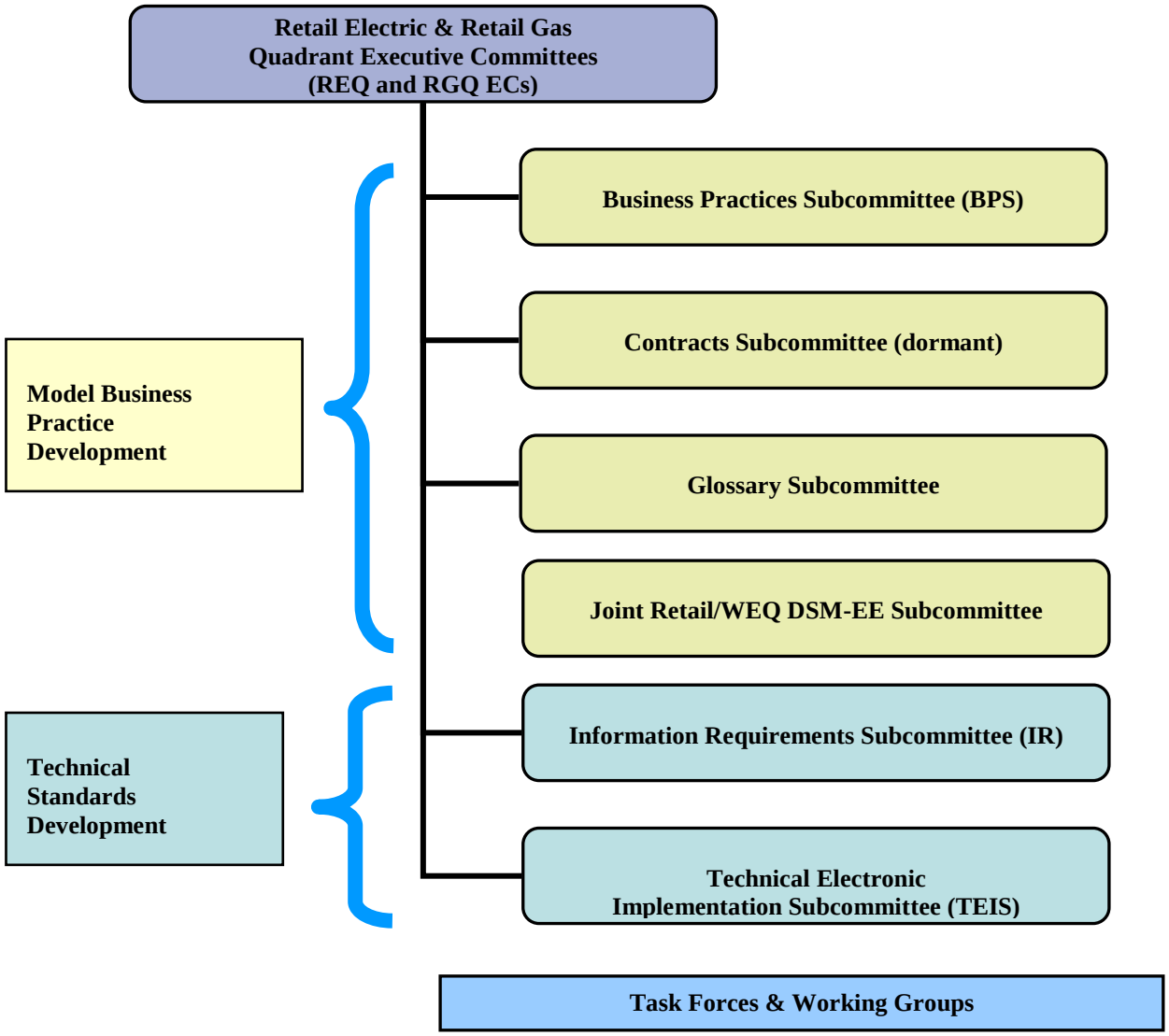

NAESB Retail Subcommittee Leadership: [5]

Executive Committee: Mike Novak, Chair (RGQ), Ruth Kiselewich, Chair (REQ)
Business Practices Subcommittee: Phil Precht (RGQ), Mary Edwards and Dan Jones (REQ)
Information Requirements Subcommittee: Jennifer Teel (REQ)
Technical Electronic Implementation Subcommittee: Dan Rothfuss (RGQ)
Glossary Subcommittee: Don Sytsma (RGQ), Mary Edwards and Patrick Eynon (REQ)
DSM-EE Subcommittee: Ruth Kiselewich, David Koogler (REQ), Roy True (WEQ), Paul Wattles (WEQ)

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End Notes Retail Plan:

[1] As outlined in the NAESB Bylaws, the REQ and RGQ will also address requests submitted by members and assigned to the REQ and RGQ through the Triage Process.

[2] Dates in the completion column are by end of the quarter for completion by the assigned committee. The dates do not necessarily mean that the standards are fully staffed to be implementable by the industry, and/or ratified by membership. If one item is completed earlier than planned, another item can begin earlier and possibly complete earlier than planned. There are no begin dates on the plan.

[3] The assignments are abbreviated. The abbreviations and committee structure can be found at the end of the annual plan document.

[4] This work is considered routine maintenance and thus the items are not separately numbered. The REQ and RGQ ECs will assign maintenance efforts on a request-by-request basis.

[5] The ECs and the subcommittees can create task forces and working groups to support their development activities for development of model business practices and technical standards.

NAESB Bulletin

March - May 2008 Volume 1, Issue 3

2008 Retail Annual Plan
2008 WEQ Annual Plan
2008 WGQ Annual Plan

NAESB Board of Directors
NAESB Executive Committee Members

NAESB Members
Membership Information
Copyright Report

2008 Calendar :

March 2008

- 03/03 - WEQ ESS/ITS Conf. Call
- 03/05 - Joint NERC/NAESB ATC/AFC Conf. Call
- 03/05 - NAESB Monthly Update Conf. Call
- 03/06 - WEQ SRS Conf. Call
- 03/10-13 - WEQ ESS/ITS/BPS Meeting (Phoenix, AZ)
- 03/12-13 - WGQ BPS Order 698 Meeting (Colorado Springs, CO)
- 03/17 - WEQ ESS/ITS Conf. Call
- 03/19-20 - WEQ JISWG Meeting (Houston, TX)
- 03/21 - Holiday - Good Friday (NAESB Closed)
- 03/24 - WEQ ESS/ITS Conf. Call
- 03/25-26 - WGQ Technical Meeting (Houston, TX)
- 03/25 - Retail BPS Conf. Call
- 03/26 - WGQ IR Meeting (Houston, TX)
- 03/26 - WEQ Leadership Meeting (Houston, TX)
- 03/26 - Retail Leadership Meeting (Houston, TX)
- 03/26 - NAESB Board Reception/Dinner (Houston, TX)
- 03/27 - NAESB Board Resources Meeting (Houston, TX)
- 03/27 - NAESB Board of Directors Meeting (Houston, TX)
- 03/28 - Demand Side Management/Energy Efficiency (DSM/EE) Meeting (Houston, TX)
- 03/28 - WEQ ESS/ITS/BPS Conf. Call
- 03/31 - WEQ ESS/ITS/BPS Conf. Call

April 2008

- 04/01-02- Joint NAESB WEQ BPS/NERC TLR Meeting (Carmel, IN)
- 04/03-04 - WEQ ESS/ITS Conf. Call
- 04/15 - WGQ Technical Meeting Richmond, VA)
- 04/15 - WEQ ESS/ITS Meeting (Charlotte, NC)
- 04/16-17 - WGQ IR Meeting (Richmond, VA)
- 04/16-17 - WEQ ESS/ITS/BPS Meeting (Charlotte, NC)
- 04/22-23 - WGQ BPS Order 698 Meeting (Washington, DC)
- 04/23 - WEQ SRS Conf. Call
- 04/29 - WEQ ESS/ITS Conf. Call
- 04/30 - WEQ ESS/ITS PBS Conf. Call

May 2008

- 05/01 - WEQ ESS/ITS/BPS Conf. Call
- 05/07 - WEQ ESS/ITS Conf. Call
- 05/12-13 - WEQ Executive Committee Meeting (Washington, DC)
- 05/12-13 - Retail BPS Meeting (Washington, DC)
- 05/14 - Retail Executive Committee Meeting (Washington, DC)
- 05/14 - WGQ IR Meeting (Washington, DC)
- 05/14-16 - WEQ ESS/ITS/BPS Meeting (Washington, DC)
- 05/15 - WGQ Executive Committee Meeting (Washington, DC)
- 05/16 - WGQ Technical Meeting (Washington, DC)
- 05/21-22 - WEQ JISWG Meeting (San Diego, CA)
- 05/21-22 - WEQ ESS/ITS/BPS Conf. Call
- 05/21 - NAESB Monthly Update Conf. Call
- 05/26 - Holiday - Memorial Day (NAESB Closed)
- 05/27 - WEQ ESS/ITS Conf. Call
- 05/28-29 - WEQ ESS/ITS/BPS Conf. Call
- 05/30 - Demand Side Management/Energy Efficiency (DSM/EE) Meeting (Holyoke, MA)

STANDARDS DEVELOPMENT

eTariff (WEQ and WGQ): The initial meeting was held on February 1, 2007 at the FERC, opened by Chairman Kelliher. Proposals from INGAA, EEI, AOPL and Texas Intrastate Association were given, along with a review by FERC staff of requirements to be met for an e-Tariff program. Since that initial meeting, we have held 26 days of meetings throughout the year, including meetings to address technical issues for XML schemas and telecommunication protocols. The eTariff recommendation for standards and implementation guide completed the industry comment and the WGQ EC and WEQ EC considered comments filed (due date was February 27) and made modifications to the recommended standards at the meeting held on February 29 in Houston. The vote on the standards has completed and was passed by both quadrants. The standards include five definitions, two business practice standards, and a technical implementation guide – all of which are considered NAESB standards The implementation guide includes instructions on how to electronically submit an eTariff XML filing package for a new, or modified existing or withdrawn/cancelled tariff, rate schedule or service agreement. The standards support a sheet based, section-based or whole document format for filing. The standards will now be processed through membership ratification and after ratification, will be filed with the FERC. [Recommendation, Implementation Guide, Chairs' Comments]

Gas Quality: The WGQ Executive Committee has acted on Request No. R06008 - gas quality standard changes to provide reporting of additional information on a more frequent basis and in formats that permitted analysis. Two standards failed via a segment block. The single segment failed standards addressed provisions for Wobbe Numbers or other alternative methods for interchangeability, and downloading of data in single files for the past 3 months. The ratification of the three standards completed in late 2007. On November 15, the FERC requested that NAESB undertake additional changes to the gas quality standards, which will be addressed by the Board and EC at its upcoming meetings. The FERC asked NAESB to develop a uniform set of standards regarding the posting of rapidly changing gas quality information. [Summary of Gas Quality Standards for R06008, FERC Order Establishing Hearing, Docket No. RP07-504-000]

DSM-EE Activities (Retail and WEQ): The scope of the first phase of standards development is measurement and verification quantity-based standards as related to demand response programs. Work is underway on identifying the M&V aspects of various DR programs administered in the wholesale market and in the retail market. A preamble and glossary are also being developed. The next meeting is March 28 in Houston, where the work done to date on the matrices, glossary and preamble will be reviewed and guidance given for the continuance of these efforts. The wholesale matrix should near completion and be presented at the March 28 meeting. [Wholesale Market DR Programs Matrix and Work Plan, Retail Market DR Programs Matrix and Work Plan]

Gas Contracts (WGQ): The NAESB Wholesale Gas Interpretations Subcommittee has prepared an interpretation regarding the use of the NAESB base contract as a forward contract or swap agreement. The interpretation is out for formal comment and after WGQ EC vote and member ratification, will be part of the standards for version 1.9 of the WGQ standards. The interpretation is being cited in several amicus briefs in front of the U.S. Court of Appeals for the 4th Circuit regarding a decision of the U.S. Bankruptcy Court in the applicability of safe harbors in *Hutson v. Smithfield Packing Co. (In re National Gas Distributors, LLC)*. [Request for Interpretation, Background Documents, Recommended Interpretation]

Update your membership - NAESB Mail Subscription Services. **Click Here**

Click on any underlined text and you can access more detailed reports.

Welcome New Members:

Arizona Public Service Company - Contacts: Tom Carlson, Kelly Daly (Wholesale Gas Quadrant, End User Segment)
Bentek Energy, LLC - Contact: E. Russell Braziel (Wholesale Gas Quadrant, Services Segment)
British Columbia Transmission Corporation - Contact: Janet Fraser (Wholesale Electric Quadrant, Transmission Segment, Fed/State/Prov. Sub segment)
EnergySouth Midstream, Inc. - Contact: Russell Murrell (Wholesale Gas Quadrant, Services Segment)
Foothills Energy Ventures, LLC - Contact: Marty Patterson (Wholesale Gas Quadrant, Producer Segment)
OGE Energy Resources, Inc. - Contact: Cary Metz (Wholesale Gas Quadrant, Services Segment)
Santee Cooper - Contact: Tom Abrams (Wholesale Electric Quadrant, Transmission Segment, Fed/State/Prov. Sub segment)
Vectren Retail, LLC - Contact: Tami Wilson (Retail Gas Quadrant, Supplier Segment)

NAESB Membership Total 335

Membership by quadrant is:

130	Wholesale Gas Quadrant
26	Retail Electric Quadrant
24	Retail Gas Quadrant
155	Wholesale Electric Quadrant

Net Membership Growth from 2007: 2 new members

CALENDAR OF ACTION ITEMS

WGQ Request for Comments on Recommendation for Interpretation C07003 - In the NAESB Base Contract for Sales and Purchase of Natural Gas, NAESB WGQ Standards No. 6.3.1, dated April 19, 2002 ("NAESB Base Contract"), are physical deliveries of natural gas made there under intended by NAESB to be subject to avoidance and potential unwinding pursuant to the fraudulent transfer provisions of Title 11 of the United States Code (the "Bankruptcy Code"), or did NAESB intend transactions under the NAESB Base Contract to constitute a "forward agreement,: and a "swap agreement" (as those terms are used in the Bankruptcy Code), thus exempting transfers under the NAESB Base Contract from avoidance and unwinding under the Bankruptcy Code - Due March 7, 2008.

WGQ Request for Comments on Recommendation for Interpretation C07002 - Request for Interpretation to clarify that on a Transportation Service Provider's (TSP) Informational Postings web site downloads of information can be in HTML or RTF format - Due March 7, 2008.

WEQ Membership Ratification for WEQ 2008 Annual Plan Item 2(i)7 - OASIS Exemptions Appendix C - Due March 13, 2008.

WEQ Request for Comments on WEQ 2008 Annual Plan Items 2.a.i.5, 2.a.i.6, and 2.a.ii.1-3:WEQ-001 changes for Rebid of Partial Service, Preconfirmation Priority, and Group 2: Metrics; Redispatch Cost Posting - Due March 21, 2008.

WEQ ESS/ITS Informal Request for Comments to address Order 890 concerning the Recommendation for Rollover Rights on Redirect on a Firm Basis - Due March 25, 2008.

STANDARDS DEVELOPMENT *(continued)*

Order 698 - Gas-Electric Interdependency: The FERC issued FERC Order No. 698, which adopted the gas-electric communication standards and highlighted areas for possible standards development: price indexing, redirects and changes to intraday nomination schedules. A proposal for redirects has been approved by the subcommittee and several proposals for price indexing have been reviewed, resulting in the drafting of several standards with others still under consideration. Most recently, a conference call was held on February 21 to review additional standards for price indexing, which is expected to complete in March – and a meeting was held on February 26-27 to review proposals on intraday timelines. The intraday timelines effort is proceeding more slowly, with several proposals under consideration. We have received a number of comments that indicate strong support for a bumpable intraday nomination period that is more closely aligned with the electric market clearing times. Comments in support of adding an additional bumpable period were received from Arizona Corporation Commission, Arizona Electric Power Corporative, Buckeye Power, Delaware Municipal Electric Corporation, El Paso Electric Company, Honeywell International, Kansas Corporation Commission, KeySpan/ National Grid, Missouri Public Service Commission, New York Independent System Operator, North Carolina Electric Membership Corporation, Old Dominion Electric Cooperative, Phelps Dodge, Salt River Project, Southwest Power Pool, Tucson Electric Power Company, Unisource Energy Services. The next meeting is scheduled for March 12-13 in Colorado Springs, where work will continue on price indexing and intraday nomination deadlines. [Order 698 Summary]

Order 890 and OATT Reform (WEQ): NAESB WEQ Subcommittees are working diligently to meet FERC deadlines. NAESB is to file ATC related standards no later than August 7, 2008. The ATC/TTC recommendations related to ATC/TTC narratives is out for industry comments and the standards related to related to load forecasts and peak loads is underway with the comment period to begin in mid-March. Neither of these efforts require joint development with NERC. NAESB is on schedule with other development tasks – both for ATC/TTC and for electronic scheduling related tasks, and we have taken steps via our last Executive Committee meeting to prioritize this work to ensure the deadlines are met. [Order 890 Work Plan, NAESB Development Process]

NAESB Primers and Training Courses:

April 23-24, 2008 - WGQ Contracts Standards and Models Course [Registration Form, Course Flier]
June 11-12, 2008 - WGQ Contracts Standards and Models Course
October 8-9, 2008 - WGQ Business Practice Standards Updates and Changes, Version 1.8
November 12-13, 2008 - WGQ Contracts Standards and Models Course

Additional training courses will be added for 2008. Please monitor the NAESB Primers and Training Courses web page for scheduling of additional courses.

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NAESB EXECUTIVE COMMITTEE MEETING MATERIALS
REGULATORY UPDATE

REGULATORY UPDATES:

- 4-11-08 Errata WEQ Version 1.0: An errata was filed with the FERC to correct a typographical error from 9 to 90.
- 4-15-08 eTariff NAESB submittal: NAESB provided the record and standards developed for the eTariff program to the FERC.
- 4-16-08 Joint Interface Committee NERC, NAESB and IRC submittal: NAESB, NERC and the IRC provided a letter indicating the JIC was no longer an operational group and the joint development process would now be used in its place.
- 4-17-08 NERC Request for Extension on Order No. 890: NERC requested an extension of time to provide the reliability standards to the FERC to support ATC and Order No. 890.
- 4-17-08 FERC NOPR on eTariff: The Commission provided a NOPR indicating its intent to adopt the NAESB standards for the eTariff program.
- 4-21-08 FERC NOPR on WEQ Version 1.0: The Commission provided a NOPR indicating its intent to adopt the NAESB standards for the eTariff program. A letter of concurrence from Commissioner Wellinghoff requested that NAESB modify its definition of ancillary services to specifically include demand resources. This should require a proposed change to the annual plan for the WEQ.
- 4-29-08 FERC Notice of Extension on Order No. 890: The Commission granted an extension to NERC for Order No. 890 related items and a corresponding extension to NAESB.