

NORTH AMERICA NDARDS BOARD 801 Travis, Suite 1675 • Houston, Texas 77002 • Phone: (713) 356-0060 • Fax: (713) 356-0067 email: naesb@naesb.org • Web Site Address: www.naesb.org

August 4, 2015 Filed Electronically

The Honorable Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street N.E., Room 1A Washington, D.C. 20426

RE: NAESB Update Report for Submittal to the Commission Concerning FERC Order No. 809, *Coordination* of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities (Docket No. RM14-2-000)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") is voluntarily submitting this report to the Federal Energy Regulatory Commission ("FERC" or "Commission") to supplement the prior reports submitted to the Commission in Docket Nos. RM14-2-000 and RM96-1-038 related to the April 14, 2014 Notice of Proposed Rulemaking, *Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities*, and FERC Order No. 809 ("Order").¹ The purpose of this report is to inform the Commission of action taken by the NAESB Board of Directors and NAESB membership in response to FERC Order No. 809, including the minor corrections submitted to the Commission to incorporate the 9:00 am Central Clock Time start to the operational gas day, and a summary of the activities the organization has taken to respond to the Commission's request in paragraph 107 of the Order related to electronic scheduling of electronic nominations and confirmations.

The cover letter, report and enclosures are being filed electronically in Adobe Acrobat[®] Portable Document Format (.pdf), with each enclosure bookmarked separately. The entire filing is also available on the NAESB website (<u>www.naesb.org</u>). Please feel free to call the office at (713) 356-0060 or refer to the NAESB website (<u>www.naesb.org</u>) should you have any questions or need additional information regarding the report.

Respectfully submitted,

Ras Mc guade

Ms. Rae McQuade President & COO, North American Energy Standards Board

¹ Order No. 809, *Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities*, 151 FERC ¶ 61,049, 80 Fed. Reg. 23,197 (2015) (to be codified at 18 CFR pt. 284).



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cc:

Chairman Norman C. Bay, Federal Energy Regulatory Commission Commissioner Tony Clark, Federal Energy Regulatory Commission Commissioner Collette Honorable, Federal Energy Regulatory Commission Commissioner Cheryl LaFleur, Federal Energy Regulatory Commission Commissioner Philip D. Moeller, Federal Energy Regulatory Commission

Mr. Michael Bardee, Director, Office of Electric Reliability, Federal Energy Regulatory Commission

Mr. Michael McLaughlin, Director, Office of Energy Market Regulation, Federal Energy Regulatory Commission

Mr. David Morenoff, General Counsel, Office of the General Counsel, Federal Energy Regulatory Commission

Ms. Jamie Simler, Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Ms. Valerie Crockett, Chairman and CEO, North American Energy Standards Board Mr. Michael Desselle, Vice Chairman, North American Energy Standards Board Mr. William P. Boswell, General Counsel, North American Energy Standards Board Mr. Jonathan Booe, Executive Vice President & CAO, North American Energy Standards Board

Enclosures (all documents noted in the appendices are available publicly on the NAESB website -

http://www.naesb.org)

- Appendix A Links to Minor Correction Filings
- Appendix B Links to June 1, 2015 Board of Directors Agenda, Meeting Minutes, and Work Papers
- Appendix C Links to the June 12, 2015 Notational Ballot, Comments, and Notational Ballot Results
- Appendix D NAESB 2015 WEQ Annual Plan
- Appendix E NAESB 2015 WGQ Annual Plan

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UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities

Docket No. RM 14-2-000

REPORT OF THE NORTH AMERICAN ENERGY STANDARDS BOARD

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The North American Energy Standards Board ("NAESB") is voluntarily submitting this report to the Federal Energy Regulatory Commission ("FERC or Commission") to inform the Commission of action taken by the NAESB Board of Directors and NAESB membership in response to FERC Order No. 809 ("Order").¹ This report supplements the two errata reports filed with the Commission on July 6, 2015 and is filed to clarify recent action by NAESB to support the Order. Additionally, a description of the activities the organization intends to undertake to satisfy the requests of the Order is included.

To support the following report, five enclosures are attached to this submittal.

- 1. Appendix A contains links to the Minor Correction Filings
- 2. Appendix B links to the agenda, minutes, and work papers from the June 1, 2015 Board of Directors Working Session
- 3. Appendix C provides links to the June 12, 2015 Board Notational Ballot, Comments, and Ballot Results
- 4. Appendix D includes the 2015 WEQ Annual Plan as modified at the direction of the Board of Directors on June 26, 2015
- 5. Appendix E includes the 2015 WGQ Annual Plan as modified at the direction of the Board of Directors on June 26, 2015

This report is intended solely as a status report from NAESB regarding activities to respond to the FERC Order. NAESB does not advocate that the Commission take a particular position on any of the issues presented.

NAESB has been working to support natural gas transportation scheduling and coordination with the electric industry since the Gas Industry Standards Board ("GISB") was expanded to NAESB and has actively developed standards in the area since 2004. As part of its latest efforts, NAESB modified existing standards to support the Commission's Notice of Proposed Rulemaking, *Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities* ("NOPR") issued on March 20, 2014 in Docket No. RM14-2-000.² These standards were submitted to the Commission on September 29, 2014³ and subsequently adopted through an April 16, 2015 Order. Per the initial request of the Commission in the NOPR, NAESB submitted two reports on July 6, 2015 that informed the Commission in the final Order. Additionally, the NAESB Board of Directors met and subsequently voted through a notational ballot to include items on the Wholesale Electric Quadrant ("WEQ") and Wholesale Gas Quadrant ("WGQ") annual plans to address the request of the Commission in the Order for the gas and electric industry to work through NAESB to explore the potential for "computerized scheduling when shippers and

¹Order No. 809, *Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities*, 151 FERC ¶ 61,049, 80 Fed. Reg. 23,197 (2015) (to be codified at 18 CFR pt. 284).

² Notice of Proposed Rulemaking, *Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities*, FERC Stats. & Regs. ¶32,700, 79 Fed. Reg. 18,223 (2014) (NOPR).

³ The September 29, 2014 NAESB Report to FERC in response to the Gas Electric Harmonization NOPR, may be accessed at the following link: <u>https://www.naesb.org/pdf4/ferc092914_naesb_geh_report_nopr032014.pdf</u>.

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confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary."⁴ These activities are described below.

Minor Corrections Submitted on July 6, 2015

On July 6, 2015, NAESB submitted *Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities - Errata for NAESB WGQ Standards, Version 2.0* to the Commission in Docket No. RM14-2-000⁵ to support the Order. The purpose of the filing was to inform the Commission of action taken by NAESB to adopt two minor corrections, MC15009 and MC15011 that incorporate the Commission's decision to adopt a 9:00 am Central Clock Time ("CCT") start to the natural gas day into the standards and make modifications for the purpose of consistency. The two minor corrections integrate the Commission's regulations into the NAESB WGQ Business Practice Standards as provided for in Paragraph 11 of the March 20, 2014 NOPR ⁶ and Paragraph 15 of the final Order.⁷ The two minor corrections are both designed to update NAESB final actions in support of WGQ Annual Plan Item 11c (Parts 1 & 2), as adopted by the Commission. The two minor corrections are necessary only if the Commission does not adopt a final rule incorporating version 3.0 of the standards in time for an April 1, 2016 implementation.⁸

In addition to the filing described above, NAESB simultaneously submitted a companion report, *Standards for Business Practices of Interstate Natural Gas Pipelines - Errata for NAESB WGQ Standards, Version 3.0*,⁹ in Docket No. RM14-2-000 to support the Order. The purpose of the report was to notify the Commission of action taken by NAESB to adopt two minor corrections, MC15009 and MC15012. MC 15009 revises Version 3.0 of the NAESB WGQ Standards to include the 9:00 am CCT start for the natural gas day. Minor correction MC15012, divided into Part A and Part B, was approved by the WGQ Executive Committee through a notational ballot on May 29, 2015 and submitted for a two week comment period ending on June 15, 2015. No comments on the minor correction were submitted and the modifications were incorporated into Version 3.0 of the NAESB WGQ standards to support WGQ Annual Plan Item 11c (Parts 1 & 2) and MC14008, and Part B corrects errors to the standards that were found in the review process. On July 16, 2015, the Commission issued a Notice of Proposed Rulemaking that targets an April 1, 2016 effective date for version 3.0 of the standards and incorporates the modifications made through MC15009.

Action Taken to Support ¶107 of FERC Order No. 809

Additionally, in the Order, the Commission requested that the gas and electric industry work through NAESB to explore the potential for "computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary."¹⁰ In response to this request, NAESB scheduled a working session of its Board of Directors on June 1, 2015 to discuss a proposal to revise the 2015 WEQ and WGQ Annual Plans to include items for the consideration of standards development for electronic scheduling among other items.¹¹ As part of this proposal, it was recommended that development of a recommendation on electronic scheduling follow a similar path to the one utilized for the Gas-Electric Harmonization standards, in that a recommended direction for standards development be made to the Board of Directors prior to the initiation of the subcommittee standards development process.

⁴ Order No. 809, *supra* note 1 at P 107.

⁵ The July 6, 2015 NAESB Report to FERC containing MC15009 and MC15011 for Version 2.0 may be accessed at the following link: <u>https://www.naesb.org/pdf4/ferc070615_naesb_errata_wgq_v2.0_ferc_order809.pdf</u>.

⁶ NOPR, *Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities, supra* note 2, at P 11. ⁷ Order No. 809, *supra* note 1, at P 15.

⁸ Notice of Proposed Rulemaking, *Standards for Business Practices of Interstate Natural Gas Pipelines*, 152 FERC ¶ 61, 055(update when published in Fed. Reg.) (2015) (Version 3.0 NOPR).

⁹ The July 6, 2015 NAESB Report to FERC containing MC15009 and MC15012 for Version 3.0 may be accessed at the following link: <u>https://www.naesb.org/pdf4/ferc070615_naesb_errata_wgq_v3.0_ferc_order809.pdf</u>. ¹⁰ *Id*.

¹¹ In addition to the item on electronic scheduling, the agenda for the June 1, 2015 working session included a discussion on a proposed revision to the 2015 WEQ and WGQ Annual Plans to the include an item for standards development related to the electronic submission of certain FERC forms such as Forms 2 and 2a - (titled "eForms"). This was requested by the Commission on April 16, 2015 in Docket No. AD15-11-000, and was the subject of a June 10, 2015 FERC Technical Conference.

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During the June 1, 2015 board working session,¹² NAESB board members discussed the timing for beginning the planning stage of the potential electronic scheduling standards development project. As proposed, the Gas-Electric Harmonization Forum ("Forum") would be reactivated for the purpose of planning -- proposing a timeline and framework for the standards development effort to the Board of Directors for consideration, prior to any standards development work being initiated. Through the discussion, a divergence of opinions of the members concerning the appropriate timing of the project became apparent; some board members supported responding to the Commission's directive by initiating planning in 2015 and other board members favored support of the Commission's directive, but postponing any planning action until 2016. Those in support of beginning planning in 2015 noted that initiating the planning process would be required in 2015 if the board is to make decisions in 2016 concerning the direction of the standards development. Those in support of beginning the planning in 2016 noted that planning for a standards development effort prior to the completion of the implementation of the Order may be premature, as many of the technical experts needed to ensure robust and informed discussion on electronic scheduling might not be available to either support the planning effort, or inform those who were supporting the planning effort, until after the April 2016 implementation of system modifications supporting the Order. Concerns were also cited that the Commission may not have intended for NAESB to address electronic scheduling through the Forum. Additionally, while most agreed that the gas and electric industries needed to jointly address electronic scheduling as the constraints of one industry would inform the development of cohesive standards, some suggested that the Commission did not intend for the gas and electric industries to work together, but rather to work independently on the issue, and only come together when joint standards were needed.

As a result of the varying feedback, the Chair of the Board of Directors recommended the distribution of a notational ballot to present the options discussed during the working session. The participants in the working session supported the recommendation, and as a result, NAESB distributed the notational ballot on June 12, 2015 and members were asked to respond by June 26, 2015. The use of notational ballots is permitted by the NAESB Bylaws¹³, and all decisions, other than changes to the certificate or bylaws, require simple majority is needed for passage from the board members of each quadrant.¹⁴

Through the notational ballot, the board was asked to consider changes to the 2015 WEQ and WGQ Annual Plans that would initiate the planning process by the Forum for the electronic scheduling project in 2015 or to begin the planning process in 2016.¹⁵ The two options were presented in annual plan items that contained mirrored language calling for the creation, through the Forum, of a standards development timeline and framework addressing electronic scheduling to be considered by the Board of Directors once completed. Under the two proposals, both the proposed timeline and framework for standards development would require approval from the Board of Directors prior to making any assignments for subsequent work. The only difference between the two proposals was the date in which the Forum should initiate its planning to respond to the electronic scheduling directive in the Order.

Fifty-nine members responded to the notational ballot out of a total of seventy-nine seated board members. Two sets of comments were provided with the ballots. The proposal to modify the 2015 WEQ and WGQ Annual Plans to move forward with work by the Gas-Electric Harmonization Forum beginning in 2015, failed to achieve a simple majority of each quadrant's board members, with 66 percent of board members that submitted ballots in favor and 34 percent of the board members that submitted ballots opposed. The proposal to modify the 2015 WEQ and WGQ Annual Plans to begin the planning work by the Forum beginning in 2016, passed the simple majority threshold with 89 percent of the board members that submitted ballots voting in favor and 11 percent of the board members that submitted ballots voting in favor and 11 percent of the board members that submitted ballots voting in favor and 11 percent of the board members that submitted ballots voting in favor and 11 percent of the board members that submitted ballots voting in favor and 11 percent of the board members that submitted ballots voting in favor and 11 percent of the board members that submitted ballots voting record can be found in Appendix C, the document titled "NAESB Board of Directors Notational Ballot Results – June 26, 2015." Appendix C also includes the ballot and comments provided.

 ¹² The draft minutes for the June 1, 2015 NAESB Board of Directors working session may be accessed at the following link: https://www.naesb.org/pdf4/bd060115dm.docx.
 ¹³ NAESB Operating Practices, Section 1.III, Lines 63-74. The NAESB Operating Practices may be accessed at the following

¹³ NAESB Operating Practices, Section 1.III, Lines 63-74. The NAESB Operating Practices may be accessed at the following link: <u>http://www.naesb.org/pdf/operating_procedures.pdf</u>.

 $^{^{14}}$ *Id*.

¹⁵ In addition two other items requested for board determination through the national ballot, One of the items called for changes to the WEQ and WGQ 2015 Annual Plans to include eForms development in response to the June 10, 2015 FERC Technical Conference. The other item asked the Board of Directors to vote on changes to the 2015 WEQ Annual Plan for routine updates as proposed by the WEQ Executive Committee.

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Next Steps

As a result of the notational ballot results, the NAESB 2015 WEQ and WGQ Annual Plans were modified to reflect the board decision that the Forum will commence planning the electronic scheduling standards development in 2016. NAESB intends to move forward with the planning for the standards development process for this effort in 2016 responding to the request of the Order. As always, NAESB appreciates the guidance of the Commission and the leadership of the Board of Directors, and looks forward to working with the industry to develop standards which will lead to a seamless marketplace for wholesale and retail natural gas and electricity, as recognized by its customers, business community, participants, and regulatory entities.

Appendices:

- A. NAESB Wholesale Gas Quadrant Minor Correction Filings for Versions 2.0 and 3.0
- B. June 1, 2015 Board of Directors Working Session Announcement, Work Papers, and Minutes
- C. June 12, 2015 Board of Directors Notational Ballot, Comments and Voting Record Links
- D. NAESB Wholesale Electric Quadrant 2015 Annual Plan
- E. NAESB Wholesale Gas Quadrant 2015 Annual Plan

Appendix A: Links to NAESB Wholesale Gas Quadrant Minor Correction Filings for Versions 2.0 and 3.0

	Appendix A – Links to NAESB Wholesale Gas Quadrant Minor Correction Filings for Versions 2.0 and 3.0					
Filing Date Filing Links Minor Correction Filings		Minor Correction Filings				
07-06-15	FERC Filing: https://www.naesb.org/pdf4/ferc070615_naesb_errata_wgq_v2.0_ferc_order809 .pdf.	FERC Filing: Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities - Errata for NAESB WGQ Standards, Version 2.0 to support FERC Order No. 809 (Docket No. RM14-2-000)				
07-06-15	FERC Filing: https://www.naesb.org/pdf4/ferc070615_naesb_errata_wgq_v3.0_ferc_order809 .pdf.	FERC Filing: Standards for Business Practices of Interstate Natural Gas Pipelines - Errata for NAESB WGQ Standards, Version 3.0 to support FERC Order No. 809 (Docket No. RM96-1 et al)				

Appendix B: Links to Board of Directors Working Session Announcement, Work Papers, and Minutes

	Appendix B – Links to Board of Directors Working Session Announcement, Work Papers, and Minutes					
Date of Session	Link to Minutes	Link to Announcement and Agenda	Links to Work Papers			
06-01-15	Board Working Session Minutes: https://www.naesb.org/pdf4/bd060115dm.docx.	Board Working Session Announcement and Agenda: https://www.naesb.org/pdf4/bd060115a.docx.	Work Papers: Natural Gas Council letter to FERC_May 15, 2015: https://www.naesb.org/pdf4/bd060115w1.pdf. Desert Southwest Pipeline Stakeholder (DSPS) Comments May 18, 2015: https://www.naesb.org/pdf4/bd060115w2.pdf. AGA, INGAA and APGA Request for Clarification of Order 809 to FERC May 28, 2015: https://www.naesb.org/pdf4/bd060115w3.pdf.			

Appendix C: Board of Directors Notational Ballot, Comments and Voting Record Links

	Appendix C – Board of Directors Notational Ballot, Comments and Voting Record Links				
Date	Notational Ballot and Voting Record Links	Links to Comments:			
06-12-15	Notational Ballot on Amendments to the WGQ and WEQ Annual Plans due June 26, 2015: <u>https://www.naesb.org/pdf4/bd061215ballot.docx</u> Voting Record June 26, 2015: <u>https://www.naesb.org/pdf4/bd061215ballot_results.docx</u> .	Notational Ballot Comments Submitted by D. Field: <u>https://www.naesb.org/pdf4/bd061215ballot_comments_dougfield.pdf</u> . Notational Ballot Comments Submitted by J. Peress: <u>https://www.naesb.org/pdf4/bd061215ballot_comments_jonathanperess.pdf</u> .			

		Item Description	Completion ⁱ	Assignment ⁱⁱ	
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)	Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection – Permanent Solution ¹	TBD	BPS	
		Note: Consideration should be given to provisional item 2.a. Work is being coordinated with the IDC Association. Status: Full Staffing			
	b)	Perform consistency review of WEQ-008 Transmission Loading Relief Business Practice Standards and develop recommendation. ² Status: Full Staffing	TBD	BPS	
	c)	Disturbance Control Standard (DCS) (BAL-002) Coordination with NERC <u>Project 2010-14.1 Phase 1 of Balancing Authority Reliability-based Controls:</u> <u>Reserves</u> Status: Monitor	TBD	BPS/TIMTF	
	d)	Revise TLR level 5 to be treated similarly to TLR Level 3 in terms of treating the next hour allocation separately from that of current hour. ($R11020$) Status: Full Staffing	TBD	BPS	
	e)	Develop, modify or delete business practice standards to support request <u>R14002</u> (NERC <u>Project 2012-05 ATC Revisions (MOD A</u>)). ³ Status: Started	2 nd Q, 2015	BPS	
	f)	Develop, modify or delete business practices standards to support NERC activities related to NERC Time Error Correction (BAL-004-0) Status: Monitor	TBD	BPS/TIMTF	

 $^{^2}$ In some sections of WEQ-008 it appears that the standards are applicable to all of the Interconnections and other it appears that the standards are only applicable to the Eastern Interconnection. The title indicates the standards are applicable to the Eastern Interconnection. ³The FERC NOPR issued June 19, 2014, available at the following link: <u>http://www.ferc.gov/whats-new/comm-meet/2014/061914/E-17.pdf</u>.

NORTH AMERICAN ENERGY STANDARDS BOARD 2015 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT Adopted by the Board of Directors on June 26, 2015

			Item Description	Completion ⁱ	Assignment ⁱⁱ
2. Develop business practice standards in support of the FERC RM05-25-000 and RM05-17-000 (OA					ATT Reform) ⁴
	a)		lop version 3 business practice standards to better coordinate the use of the t nission providers.	ransmission syste	m among neighboring
		Statu	s: Underway		
	Request R05004 was expanded to include the <u>Order No. 890 (Docket Nos.RM05-17-000 and RM02-25-000)</u> , (<u>Ord 890-A (Docket Nos. RM05-17-001, 002 and RM05-25-001, 002</u>), and <u>Order No. 890-B (Docket Nos. RM05-17-03 RM05-25-03)</u> "Preventing Undue Discrimination and Preference in Transmission Services"				
	i) Group 4: Preemption; Request No. <u>R05019 (Part of Preemption and Competition)</u>				
			Status: Started	2016	OASIS
		ii)	Group 6: Miscellaneous (Paragraph 1627 ⁵ of FERC Order No. 890)		
			 Paragraphs 1627 of Order 890 – Posting of additional information or OASIS regarding firm transmission curtailments Status: Not Started 	n TBD	OASIS/BPS
			 Redispatch Cost Posting to allow for posting of third party offers of planning redispatch services. Status: Not Started 	TBD	OASIS/BPS

- **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) Make remaining incremental enhancements to OASIS as an outgrowth of the NAESB March 29, 2005 conference on the future of OASIS (<u>R05026</u>).

Scoping <u>statement</u> completed by SRS. There were a number of assignments from the Standards Request. The outstanding items are included below:

 Eliminate Masking of TSR tag source and sink when requested status is denied, withdrawn refused, displaced, invalid, declined, annulled or retracted Status: Completed

⁴ FERC Order No. 890, issued February 16, 2007, can be accessed from the following link:

http://www.naesb.org/doc_view4.asp?doc=ferc021607.doc.

⁵ Paragraph 1627 of FERC Order No. 890, issued February 16, 2007: We agree with suggestions for the posting of additional curtailment information on OASIS and, therefore, require transmission providers, working through NAESB, to develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments. Transmission providers need not implement this new OASIS functionality and any related business practices until NAESB develops appropriate standards. These postings must include 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. This information is in addition to the Commission's existing requirements: (1) when any transmission provider must state on OASIS the reason why the transaction could not be continued or completed; (2) information to support any such curtailment or interruption, including the operating status of facilities involved in the constraint or interruption, must be maintained for three years and made available upon request to the curtailed or interrupted customer, the Commission's Staff, and any other person who requests it; and, (3) any offer to adjust the operation of the transmission provider's system to restore a curtailed or interrupted transaction must be posted and made available to all curtailed and interrupted transmission customers at the same time.

		Item Description	Completion ⁱ	Assignment ⁱⁱ
	2)	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: Completed	2 nd Q, 2015	OASIS
	3)	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. Status: Not Started (upon initiation of this item by NAESB, a completion date will be determined)	TBD	OASIS/BPS
b)	-	ents for OASIS to use data in the Electric Industry Registry (<u>R12001</u>) ot Started	TBD	OASIS
. De	velop and/	or maintain standard communication protocols and - cybersecurity b	usiness practice	s as needed.
a)	Develop condition	modifications for WEQ-012 as needed to reflect current market s		
	A	eview annually at a minimum, the accreditation requirements for uthorized Certification Authorities to determine if any changes are eeded to meet market conditions. ⁶ atus: Started	2015	Cybersecurity Subcommittee
b)		VEQ standards for impact of XML vulnerability exploits and make ions as needed to standards and functional specifications arted	TBD	Cybersecurity Subcommittee/ CISS
c)	current ve	and modify standards as needed to support and/or complement the ersion of the NERC Critical Infrastructure Protection Standards ⁷ and any vities of the FERC related to cybersecurity. arted	2 nd Q, 2015	Cybersecurity Subcommittee
Ma	aintain exis	ting body of Version 3.x standards		
a)	"System_	nt with ¶51 of FERC Order No. 890-A, add AFC and TFC values to the Attribute" data element of the NAESB Standard WEQ-003: OASIS ata Dictionaries. (<u>R08011</u>) ompleted	2 nd Q, 2015	OASIS
b)	Correct V Status: C	VEQ 013-2.6.7.2. – Resale off OASIS (<u>R08027</u>) ompleted	2 nd Q, 2015	OASIS
c)		uage to WEQ-001-4 Online Negotiation and Confirmation process to able 4-3 (<u>R09003</u>) sarted	2016	OASIS
d)	without t	new OASIS mechanism that allows for the merger of like reservations he use of the resale mechanism (<u>R09015</u>) ot Started	TBD	OASIS

⁶ The "NAESB Accreditation Requirements for Authorized Certification Authorities" can be found at:

http://www.naesb.org/member_login_check.asp?doc=certification_specifications.docx. ⁷ http://www.nerc.com/pa/Stand/Pages/CIPStandards.aspx

	Item Description	Completion ⁱ	Assignment ⁱⁱ
e	 Improve transparency to allow customers to determine whether they have been treated in a non-discriminatory manner by posting of additional information on OASIS when service is denied (i.e. refused or declined) by customer(s) using new SAMTS process across multiple transmission systems to serve their NITS load on multiple systems. (<u>R12006</u>) Status: Not Started 	TBD	OASIS/BPS
f	Review WEQ-004, EIR Business Practice Standards, e-Tag Specification, and e- Tag Schema to make the necessary modifications to recognize the Market Operator Role within the Electric Industry Registry Status: Started	2015	CISS
5. E	evelop or modify standards to Support <u>FERC Order No. 676-E</u> , (Docket No. RM	05-5-013)	
a	Develop standards to support the Transmission Provider right to reassess the availability of conditional firm (See $\P 72^8$) Status: Completed	2 nd Q, 2015	OASIS
7. D	evelop or modify standards to Support <u>FERC Order No. 676-H</u> (Docket No. RMC	05-5-022)	
a	Consistent with FERC Order Nos. 890 and 676-H, modify NAESB standards WEQ-001-14.1.3 and WEQ-001-15.1.2 to provide for a one-day requirement for posting Available Transfer Capability narratives. (See ¶ 29). Status: Completed	1 st Q, 2015	OASIS
b	 Modify NAESB standards WEQ-001-9.5, WEQ-001-10.5, and related standards to be consistent with the Commission's policy in <i>Dynegy Power Marketing, Inc.</i>, 99 FERC ¶ 61,054 (2002) and <i>Entergy Services, Inc.</i>, 137 FERC ¶ 61,199 (2011), <i>order on reh'g and compliance</i>, 143 FERC ¶ 61,143 (2013), 148 FERC ¶ 61,209 (2014). (See ¶ 49). Status: Completed 	1 st Q, 2015	OASIS
c	Revise NAESB standard WEQ-001-106.2.5 to clarify when Transmission Providers may refuse a request for terminating secondary network service based on the availability of capacity. (See ¶ 59). Status: Completed	1 st Q, 2015	OASIS
d	 Consider Bonneville Power Administration comment concerning the treatment of a conditional point-to-point reservation included in a coordinated group when displaced through preemption. (See ¶ 65). Completed 	1 st Q, 2015	OASIS
	evelop and/or modify standards to support FERC Order Instituting Proceeding t rotocols for Commission Forms (Docket No. AD15-11-000) ⁹	o Develop Elect	tronic Filing
a		TBD	Joint WEQ/WGQ FERC Forms Subcommittee

⁸ 72. However, we reiterate here the Commission's finding in Order No. 890 that a transmission provider is permitted to extend its right to reassess the availability of conditional firm service. Since the Version 002.1 Standards do not specifically address this issue, we would ask the industry, working through NAESB, to continue to look at additional business practice standards facilitating a transmission provider's extension of its right to perform a reassessment.
⁹ The FERC Order Instituting Proceeding to Develop Electronic Filing Protocols for Commission Forms, issued on April 16, 2015, can be found

⁹ The FERC Order Instituting Proceeding to Develop Electronic Filing Protocols for Commission Forms, issued on April 16, 2015, can be found through the following hyperlink: <u>https://www.naesb.org/pdf4/ferc041615_electronic_filing_protocols_forms.pdf</u>

		Item Description	Completion ⁱ	Assignment ⁱⁱ		
9.	9. Gas-Electric Coordination					
	a)	Review FERC Order No. 809 ¶ 107 issued in Docket No. RM14-2-000 ¹⁰ regarding computerized scheduling and provide recommended direction concerning the development of standards or modifications to existing standards as needed to support the request of the Commission ¹¹ The recommended direction will require board approval, for both the timeline to be pursued and the framework for standards development Status: Not Started, and <i>planning not to be started before 2016</i>	TBD	Gas-Electric Harmonization Forum, NAESB Board of Directors, WEQ EC & WGQ EC		
	b)	Resulting from the efforts of annual plan item 9(a), develop standards as needed and directed by the Board of Directors, which are specifically assigned to the WEQ Status: Not Started, dependent on completion of item 9(a).	TBD	WEQ EC and relevant subcommittees		

¹⁰FERC Order No. 809 can be found through the following hyperlink: https://www.ferc.gov/whats-new/comm-meet/2015/041615/M-1.pdf ¹¹FERC Order No. 809 ¶107. While NAESB's modified standards represent an improvement over the currently effective standards, we continue to recognize that additional intraday nomination opportunities could promote more efficient use of existing pipeline infrastructure and provide additional operational flexibility to all pipeline shippers, including gas-fired generators. The modified NAESB standards reflect reduced intraday processing times from the current NAESB standards (i.e., three hours instead of the current four hours), and existing operational limitations, including the manual processes utilized by pipelines for processing nominations, may affect the ability of the gas industry to add additional standard nomination cycles applicable to all shippers. However, the use of computerized scheduling would appear to provide an opportunity for faster and more frequent scheduling of intraday nominations for those shippers and their confirming parties willing to commit to scheduling electronically. We request that gas and electric industries, through NAESB, explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary. Providing such an option would enable those entities that need greater scheduling flexibility to have their requests processed expeditiously.

NORTH AMERICAN ENERGY STANDARDS BOARD 2015 ANNUAL PLAN for the WHOLESALE ELECTRIC QUADRANT As Proposed by the WEQ Annual Plan Subcommittee

ONAL ITEMS

1. Gas/Electric Coordination

a) Conduct assessment to determine if Electric Industry Requirements documented in WEQ-011 Gas / Electric Coordination should be considered reliability requirements and transition to NERC.

2. **Optional Work to Extend Existing Standards**

- a) Prepare recommendations for future path for TLR¹ (Phase 2) in concert with NERC, which may include alternative congestion management procedures². Work on this activity is dependent on completing 2010 WEQ Annual Plan 1.a (Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection Phase 1).
- b) Develop needed business practice standards for organization/company codes for NAESB standards and address current issues on the use of DUNs numbers. Common code usage is linked to the transition of the Registry from NERC to NAESB.

3. **Pending Regulatory or Legislative Action**

- a) Determine NAESB action needed to support FERC Action Plan for Smart Grid Technology.
- b) Develop business practice standards for cap and trade programs for greenhouse gas.
- c) Develop standards as needed based on FERC Order No. 1000. (NAESB Analysis of FERC Order No. 1000)
- d) Develop standards as needed in support of Variable Energy Resources (VERs) final order (RM10-11-000). (<u>NAESB</u> <u>Comments 3-2-11, FERC NOPR RM10-11-000, FERC Final Order No. 764, Docket No. RM10-11-000³</u>)
- e) Develop and/or modify Demand Response Standards as needed in response to the Supreme Court decisions regarding the final D.C. Circuit ruling on FERC Order No. 745

¹ Phase 2 of the Parallel Flow Visualization looks at developing options for and reporting of the most cost effective alternatives to achieve curtail obligations assigned during Phase 1.

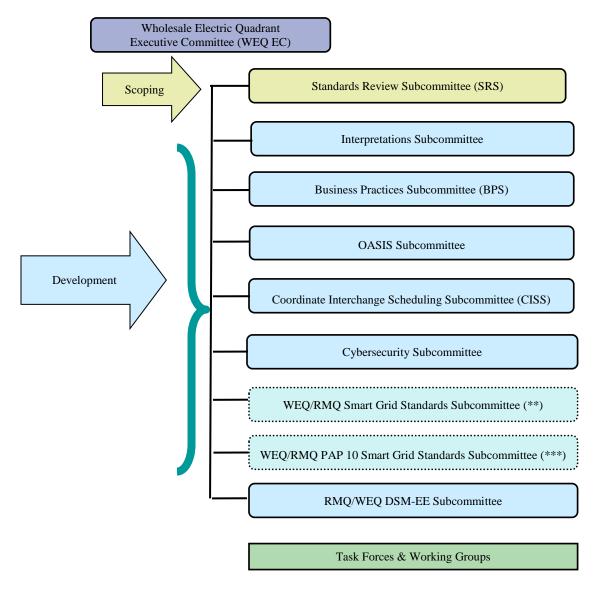
² For additional information, please see comments submitted by PJM and Midwest ISO for this Annual Plan Item: http://www.naesb.org/pdf3/weq_aplan102907w1.pdf.

³ For FERC Final Order No. 764, Docket No. RM10-11-000, specifically paragraph nos. 146 and 182 should be reviewed:

^{146.} The Commission concludes that an independent review of NERC standards and NAESB business practices is not necessary prior to the implementation of intra-hour scheduling. As noted by NERC, several entities currently offer intra-hour scheduling without any apparent conflict with Reliability Standards. NERC comments that it does not believe there are any existing standards that prohibit industry from implementing intra-hour scheduling, and no commenters have pointed to specific NAESB business practices that prevent industry from implementing intra-hour scheduling. The Commission therefore concludes that it is not necessary to delay adoption of the intra-hour scheduling requirements of this Final Rule pending further review of NERC Reliability Standards and NAESB business practices. To the extent industry believes it is beneficial to refine one or more existing NERC Reliability Standards or NAESB business practices to reflect intra-hour scheduling, stakeholders can use existing processes to pursue such refinements.

^{182.} Some commenters request that the Commission standardize protocols for reporting meteorological or forced outage data required by this Final Rule. The Proposed Rule did not contain standard protocols for data reporting and, as a result, the merits of such a requirement have not been fully addressed in the record. Whether standardization of data communications would facilitate or hinder development of power production forecasting may implicate a variety of data and communications issues that would benefit from broad industry input through standards development processes such as those used by NAESB and other organizations.

WHOLESALE ELECTRIC QUADRANT EXECUTIVE COMMITTEE AND SUBCOMMITTEE STRUCTURE



NAESB WEQ EC and Active Subcommittee Leadership:

Executive Committee (EC): Kathy York (Chair) and Bob Harshbarger (Vice Chair)
Standards Review Subcommittee (SRS): Rebecca Berdahl
Interpretations Subcommittee: Ed Skiba
Business Practices Subcommittee (BPS) & Time and Inadvertent Management Task Force (TIMTF): Jason Davis, Ross
Kovacs, Narinder Saini
Open Access Same Time Information System (OASIS) Subcommittee: J.T. Wood, Alan Pritchard

Coordinate Interchange Scheduling Subcommittee (CISS): Bob Harshbarger (NAESB), Joshua Phillips (NERC)

Cybersecurity Subcommittee: Jim Buccigross

Demand Side Management-Energy Efficiency (DSM-EE) REQ/WEQ Subcommittee: Roy True (WEQ), Paul Wattles (WEQ), and Eric Winkler (RMQ)

Inactive Subcommittees:

e-Tariff Joint WEQ/WGQ Subcommittee (e-Tariff): Keith Sappenfield (WGQ)

- (**) The Smart Grid Standards Subcommittee is a joint group of the retail electric and wholesale electric quadrants with other standards development groups such as OASIS (Organization for the Advancement of Structured Information Standards, not Open Access Same Time Information Systems related to NAESB standards and FERC actions), CalConnect, FIX and UCAIug, among others. Direction may be given from NIST, DoE or FERC and the group reports jointly to the NAESB Board Smart Grid Strategic Steering Committee and the WEQ and RMQ ECs.
- (***) The PAP 10 Smart Grid Standards Subcommittee is a joint group of the retail electric and wholesale electric quadrants with other standards development groups such as OASIS, UCAIug, OpenADE, ZigBee, ASHRAE, EIS Alliance, NARUC and includes other groups. Direction may be given from NIST, DoE or FERC and the group reports jointly to the NAESB Board Smart Grid Strategic Steering Committee and the WEQ and RMQ ECs.

NORTH AMERICAN ENERGY STANDARDS BOARD 2015 Annual Plan for the Wholesale Gas Quadrant Adopted by the Board of Directors on June 26, 2015

	Item Description	Completion ⁱⁱⁱ	Assignment ^{iv}
1. Updat	te Standards Matrix Tool for Ease of Use ^v		
a.	Update the reference tool developed for Version 2.1 to reflect modifications applicable to Version 3.0 Status: Not Started – Pending Publication of Version 3.0	TBD	IR/Technical
2. Electr	ronic Delivery Mechanisms		
a.	Review minimum technical characteristics in Appendices B, C, and D of the WGQ QEDM Manual, and make changes as appropriate. Status: Not Started	2015	EDM
3. Gas-E	Sectric Coordination		
a.	Develop new standards and modify existing standards, as necessary, to support FERC order(s) issued in Docket No. RM14-2-000.	2 nd Q, 2015	Executive Committee
b.	Review FERC Order No. 809 ¶ 107 issued in Docket No. RM14-2- 000^{1} regarding computerized scheduling and provide recommended direction concerning the development of standards or modifications to existing standards as needed to support the request of the Commission ² The recommended direction will require two-step board approval, for both the timeline to be pursued and the framework for standards development	TBD	Gas-Electric Harmonization Forum, NAESB Board of Directors, WEQ EC & WGQ EC
	Status: Not Started, and <i>planning not to be started before 2016</i>		
c.	Resulting from the efforts of annual plan item 3(b), develop standards as needed and directed by the Board of Directors, which are specifically assigned to the WGQ. Status: Not Started, dependent on completion of item 3(b).	TBD	WGQ EC and relevant subcommittees
	op and/or modify standards to support FERC Order Instituting Pro- cols for Commission Forms (Docket No. AD15-11-000) ³	oceeding to Deve	lop Electronic Filing
a.	Develop business practices as needed to support electronic filing protocols for submittal of FERC Forms Status: Not Started	TBD	Joint WEQ/WGQ FERC Forms Subcommittee
Program	of Standards Maintenance & Fully Staffed Standards Work		
Busi	ness Practice Requests	Ongoing	Assigned by the EC ^{vi}
	tinue review against plan for migration to ANSI ASC X12 new ions as needed and coordinate such activities with DISA.	Ongoing	ANSI X12 Subcommittee
Info	rmation Requirements and Technical Mapping of Business Practices	Ongoing	Assigned by the EC ³

¹FERC Order No. 809 can be found through the following hyperlink: https://www.ferc.gov/whats-new/comm-meet/2015/041615/M-1.pdf ²FERC Order No. 809 ¶107. While NAESB's modified standards represent an improvement over the currently effective standards, we continue to recognize that additional intraday nomination opportunities could promote more efficient use of existing pipeline infrastructure and provide additional operational flexibility to all pipeline shippers, including gas-fired generators. The modified NAESB standards reflect reduced intraday processing times from the current NAESB standards (i.e., three hours instead of the current four hours), and existing operational limitations, including the manual processes utilized by pipelines for processing nominations, may affect the ability of the gas industry to add additional standard nomination cycles applicable to all shippers. However, the use of computerized scheduling would appear to provide an opportunity for faster and more frequent scheduling of intraday nominations for those shippers and their confirming parties willing to commit to scheduling electronically. We request that gas and electric industries, through NAESB, explore the potential for faster, computerized scheduling when shippers and confirming parties all submit electronic nominations and confirmations, including a streamlined confirmation process if necessary. Providing such an option would enable those entities that need greater scheduling flexibility to have their requests processed expeditiously. ³The FERC Order Instituting Proceeding to Develop Electronic Filing Protocols for Commission Forms, issued on April 16, 2015, can be found through the following hyperlink: https://www.naesb.org/pdf4/ferc041615_electronic_filing_protocols_forms.pdf

NORTH AMERICAN ENERGY STANDARDS BOARD 2015 Annual Plan for the Wholesale Gas Quadrant Adopted by the Board of Directors on June 26, 2015

Item Description	Completion ⁱⁱⁱ	Assignment ^{iv}
Interpretations for Clarifying Language Ambiguities	Ongoing	Assigned by the EC ³
Maintenance of Code Values and Other Technical Matters	Ongoing	Assigned by the EC ³
Maintenance of eTariff Standards	As Requested	Assigned by the EC ³

Provisional Activities

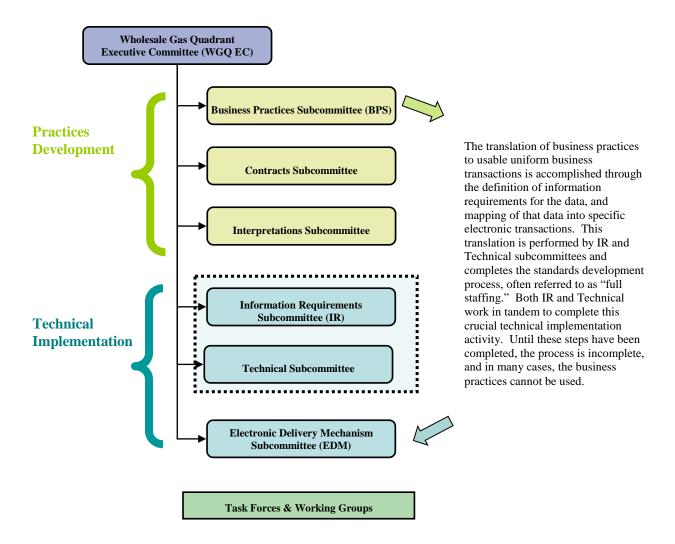
 Develop standards as needed in support of Variable Energy Resources (VERs) final order (RM10-11-000). (<u>NAESB</u> <u>Comments 3-2-11</u>, <u>FERC NOPR RM10-11-000</u>, <u>FERC Final Order RM10-11-000</u>⁴) In review of the NAESB standards, the Gas/Electric Operational Communications Standards may require changes, and other standards may be required or modified to support gas-electric coordination.

2. Develop standard wholesale contract for short term sale, purchase or exchange of Liquefied Natural Gas (LNG).

⁴ For FERC Final Order, Docket No. RM10-11-000, specifically paragraph nos. 146 and 182 should be reviewed:

^{146.} The Commission concludes that an independent review of NERC standards and NAESB business practices is not necessary prior to the implementation of intra-hour scheduling. As noted by NERC, several entities currently offer intra-hour scheduling without any apparent conflict with Reliability Standards. NERC comments that it does not believe there are any existing standards that prohibit industry from implementing intra-hour scheduling, and no commenters have pointed to specific NAESB business practices that prevent industry from implementing intra-hour scheduling. The Commission therefore concludes that it is not necessary to delay adoption of the intra-hour scheduling requirements of this Final Rule pending further review of NERC Reliability Standards and NAESB business practices. To the extent industry believes it is beneficial to refine one or more existing NERC Reliability Standards or NAESB business practices to reflect intra-hour scheduling, stakeholders can use existing processes to pursue such refinements.

^{182.} Some commenters request that the Commission standardize protocols for reporting meteorological or forced outage data required by this Final Rule. The Proposed Rule did not contain standard protocols for data reporting and, as a result, the merits of such a requirement have not been fully addressed in the record. Whether standardization of data communications would facilitate or hinder development of power production forecasting may implicate a variety of data and communications issues that would benefit from broad industry input through standards development processes such as those used by NAESB and other organizations.



NAESB 2015 WGQ EC and Subcommittee Leadership:

Executive Committee: Jim Buccigross, Chair and Dale Davis, Vice-Chair Business Practices Subcommittee: Kim Van Pelt, Paul Jones, Sylvia Munson Information Requirements Subcommittee: Dale Davis, Rachel Hogge Technical Subcommittee: Kim Van Pelt Contracts Subcommittee: Keith Sappenfield Electronic Delivery Mechanism Subcommittee: Leigh Spangler

Appendix E: NAESB Wholesale Gas Quadrant 2015 Annual P

	Time Shifts All times CT	Current NAESB Standards	NOPR	No Gas Day Start Time Specified
	Timely day-ahead Nom Deadline	11:30 AM	1:00 PM	1:00 PM
Timely	Confirmations			4:30 PM
Timery	Schedule Issued	4:30 PM	4:30 PM	5:00 PM
	Start of Gas Flow	9:00 AM	4:00 AM	
	Evening Day-ahead Nom Deadline	6:00 PM	6:00 PM	6:00 PM
Evening	Confirmations	9:00 PM	9:00 PM	8:30 PM
Evening	Schedule Issued	10:00 PM	10:00 PM	9:00 PM
	Start of Gas Flow	9:00 AM	4:00 AM	
	ID1 Nom Deadline	10:00 AM	8:00 AM	10:00 AM
	Confirmations	1:00 PM	10:00 AM	12:30 PM
	Schedule Issued	2:00 PM	11:00 AM	1:00 PM
ID1	Start of Gas Flow	5:00 PM	12:00 Noon	2:00 PM
	Hours of Flow	16 hours	16 hours	
	IT Bump Rights	bumpable	bumpable	bumpable
	EPSQ	33%	33%	
	ID2 Nom Deadline	5:00 PM	10:30 AM	2:30 PM
	Confirmations	8:00 PM	1:00 PM	5:00 PM
	Schedule Issued	9:00 PM	2:00 PM	5:30 PM
ID2	Start of Gas Flow	9:00 PM	4:00 PM	6:00 PM
	Hours of Flow	12 hours	12 hours	
	IT Bump Rights	no bump	bumpable	bumpable
	EPSQ	50%	50%	
	ID3 Nom Deadline		4:00 PM	7:00 PM
	Confirmations		5:00 PM	9:30 PM
	Schedule Issued		6:00 PM	10:00 PM
ID3	Start of Gas Flow		7:00 PM	10:00 PM
	Hours of Flow		9 hours	
	IT Bump Rights		bumpable	no bump
	EPSQ		63%	

	Time Shifts All times CT	Current NAESB Standards	NOPR	No Gas Day Start Time Specified
ID4	ID4 Nom Deadline		7:00 PM	
	Confirmations		8:00 PM	
	Schedule Issued		9:00 PM	
	Start of Gas Flow		9:00 PM	
	Hours of Flow		7 hours	
	IT Bump Rights		no bump	
	EPSQ		71%	

End Notes NAESB Wholesale Electric Quadrant 2015 Annual Plan and Wholesale Gas Quadrant 2015 Annual Plan

End Notes WEQ 2015 Annual Plan:

ⁱ Dates in the completion column are by end of the quarter for completion by the assigned committee, sub-committee or task force. 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.

ⁱⁱ The assignments are abbreviated. The abbreviations and sub-committee structure can be found at the end of the annual plan document.

End Notes, WGQ 2015 Annual Plan:

ⁱⁱⁱ 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.

^{iv} The assignments are abbreviated. The abbreviations and committee structure can be found at the end of the annual plan document.

^v As business issues are presented to the Information Requirements Subcommittee and Technical Subcommittee, those business issues will be given precedence over WGQ 2015 Annual Plan Item No. 1.

^{vi} The EC assigns maintenance of existing standards on a request-by-request basis.