-----Original Message-----

From: Chris Norton <[CNorton@amppartners.org](mailto:CNorton@amppartners.org)>

Sent: Tuesday, August 27, 2019 1:16 PM

To: naesb <[naesb@naesb.org](mailto:naesb@naesb.org)>

Subject: FW: NAESB WEQ Request for Formal Comments on Recommendations to Support Standards Request R19008 and 2019 WEQ Annual Plan Item 3.h/Standards Request R18011 – Due September 18, 2019

AMP submits the following comment on R19008. The recommendation is to add the following language:

X004-1.9 Each BA shall only implement or operate a Pseudo-Tie that is included in the NAESB EIR publication.

If it is possible for a pseudo-tie to be inadvertently dropped from the EIR publication, there should be language that allows BAs sending, receiving, and or on the path of a pseudo-tie to allow the pseudo-tie to be implemented or continue operation provided the pseudo-tie owner provided notification of the pseudo-tie.

Chris Norton

American Municipal Power, Inc.

1111 Schrock Road, Suite 100

Columbus, OH 43229

Phone: (614)540-6417

-----Original Message-----

From: [naesbmail@naesb.org](mailto:naesbmail@naesb.org) [<mailto:naesbmail@naesb.org>]

Sent: Monday, August 19, 2019 3:00 PM

To: Chris Norton

Subject: NAESB WEQ Request for Formal Comments on Recommendations to Support Standards Request R19008 and 2019 WEQ Annual Plan Item 3.h/Standards Request R18011 – Due September 18, 2019

Dear Wholesale Electric Quadrant Members and Interested Industry Participants,

The following recommendations were approved by the WEQ Coordinate Interchange Scheduling Subcommittee. An industry comment period begins today, August 19, 2019 and ends at the close of business on September 18, 2019 for the following Wholesale Electric Quadrant recommendations:

Recommendations:

Standards Request R19008 – Review of NAESB WEQ Business Practice Standards following NERC Standards Efficiency Review retirements affecting the INT Family of Reliability Standards

Recommendation: <https://nam03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fnaesb.org%2Fmember_login_check.asp%3Fdoc%3Dweq_r19008_rec.docx&amp;data=02%7C01%7Ccnorton%40amppartners.org%7C8637a30af10144a6b56408d724d77a6a%7C7f4d0b31d7cb498497827cc0c70caf1a%7C0%7C1%7C637018380227868425&amp;sdata=PRdBckTAM1Eme1PgmLsrwKgvUKhFiIqBWUfiMcYt6vU%3D&amp;reserved=0>

2019 WEQ Annual Plan Item 3.h/Standards Request R18011 – Request regarding the implementation of WEQ-004 Appendix D Commercial Timing Tables for WECC

Recommendation: <https://nam03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fnaesb.org%2Fmember_login_check.asp%3Fdoc%3Dweq_2019_api3h_r18011_rec2.docx&amp;data=02%7C01%7Ccnorton%40amppartners.org%7C8637a30af10144a6b56408d724d77a6a%7C7f4d0b31d7cb498497827cc0c70caf1a%7C0%7C1%7C637018380227868425&amp;sdata=McRFzfoAsvwI9wPVbFUL4Y7C19mr21shIUIXwKW7nx0%3D&amp;reserved=0>

All interested parties, regardless of membership status within NAESB, are eligible to submit comments for consideration. The Wholesale Electric Quadrant Executive Committee will review the recommendation and consider for vote at the meeting following the close of the comment period. This meeting will be open, as all NAESB meetings, and we encourage those who submit comments to attend.

All comments received by the NAESB office by end of business on September 18, 2019 will be posted on the Request and Standards Activity Applicable to Wholesale Electric Quadrant page (<https://nam03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fnaesb.org%2Fweq_request.asp&amp;data=02%7C01%7Ccnorton%40amppartners.org%7C8637a30af10144a6b56408d724d77a6a%7C7f4d0b31d7cb498497827cc0c70caf1a%7C0%7C1%7C637018380227868425&amp;sdata=AwMttD5JrlhX3yrpIik9nPeQhaMB2Cn5jFhf7SNzxqQ%3D&amp;reserved=0>) and forwarded to the Wholesale Electric Quadrant Executive Committee members for their consideration. If you have difficulty downloading the recommendations, please call the NAESB office at (713) 356-0060.

Best Regards,

Caroline Trum

NAESB Deputy Director

cc: Rae McQuade, President