



## NORTH AMERICAN ENERGY STANDARDS BOARD

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November 28, 2018  
Filed Electronically

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

RE: Federal Energy Regulatory Commission Standards for Business Practices and Communication Protocols  
for Public Utilities Notice of Proposed Rulemaking (Docket No. RM05-5-026)

Dear Ms. Bose:

The North American Energy Standards Board ("NAESB") requests that the Federal Energy Regulatory Commission ("FERC" or "Commission") consider these out of time comments as responsive to an issue raised by another commenter, Jonathan E. Hardis, pursuant to the Commission's *Standards for Business Practices and Communication Protocols for Public Utilities Notice of Proposed Rulemaking* issued on October 4, 2018 in Docket No. RM05-5-026. NAESB voluntarily submits these comments to provide clarity to the issues under consideration, to ensure a complete record, and to assist the Commission in its decision-making process.

The cover letter and comments are being filed electronically in Adobe Acrobat® Portable Document Format (.pdf). The entire filing is also available on the NAESB web site ([www.naesb.org](http://www.naesb.org)). Please feel free to call the office at (713) 356-0060 or refer to the NAESB website ([www.naesb.org](http://www.naesb.org)) should you have any questions or need additional information regarding the standards development effort.

Respectfully submitted,

Ms. Rae McQuade

President & COO, North American Energy Standards Board

cc: Chairman, Neil Chatterjee, Federal Energy Regulatory Commission  
Commissioner, Richard Glick, Federal Energy Regulatory Commission  
Commissioner, Cheryl A. LaFleur, Federal Energy Regulatory Commission  
Commissioner, Kevin J. McIntyre, Federal Energy Regulatory Commission

Mr. Andrew Dodge, Director, Office of Electric Reliability, Federal Energy Regulatory Commission

Mr. James Danly, General Counsel of the Commission, Federal Energy Regulatory Commission

Mr. Michael Goldenberg, Senior Attorney, Office of General Counsel, Federal Energy Regulatory Commission

Ms. Anna Cochrane, Director, Office of Energy Market Regulation, Federal Energy Regulatory Commission

Ms. Jignasa Gadani, Acting Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Mr. Michael Desselle, Chairman and Chief Executive Officer, North American Energy Standards Board

Mr. Jonathan Booe, Vice President and CAO, North American Energy Standards Board

Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Mr. James B. Robb, President and Chief Executive Officer, North American Electric Reliability Corporation

Mr. Mark Lauby, Senior Vice President and Chief Reliability Officer, North American Electric Reliability Corporation

Mr. Charles A. Berardesco, Senior Vice President, General Counsel, and Corporate Secretary, North American Electric Reliability Corporation



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**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

**Standards for Business Practices and Communication )  
Protocols for Public Utilities )**

**Docket No. RM05-5-026**

The North American Energy Standards Board (“NAESB”) submits these comments in reply to the comments of Jonathan E. Hardis filed pursuant to the October 4, 2018 *Standards for Business Practices and Communication Protocols for Public Utilities Notice of Proposed Rulemaking* (“NOPR”) issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”) in Docket No. RM05-5-026. NAESB requests that the Commission consider these out of time comments for the purpose of providing clarity, ensuring a full and complete record, and assisting the Commission in its decision-making process. These comments serve to clarify the notice provided by NAESB regarding the time error correction standards development effort and speak to the openness and balance of interest provided for by the NAESB standards development process. This filing supplements the information provided to the Commission by NAESB in reports previously submitted on March 27, 2017<sup>1</sup> and December 8, 2017.<sup>2</sup> Further information surrounding manual time error correction and the North American Electric Reliability Corporation standards development process is available in Commission Docket No. RD17-1-000. These comments are not meant to advocate for any particular position or the adoption of any NAESB standard or body of work but rather are solely informational in nature.

NAESB is accredited by the American National Standards Institute (“ANSI”) and serves as a non-profit 501(c)(6) standards development organization for the purpose of developing voluntary, consensus-based standards and model business practices that streamline the transactional processes of the natural gas and electric industries by promoting more competitive and efficient services in the wholesale and retail gas and electric markets. As an ANSI accredited organization, NAESB is obligated to adhere to the ANSI principles of standards development, including openness, which requires timely, clear, and meaningful notice of a standards development activity, and balancing of interests, meaning that no one interest comprises a majority of the membership body.<sup>3</sup> These, among others, are defined within the NAESB Bylaws as governing principles for the organization.

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<sup>1</sup> The NAESB Status Report on the Reservation of WEQ-006 Manual Time Error Correction Business Practice Standards is available at the following link: [https://naesb.org/pdf4/ferc032717\\_time\\_error\\_correction\\_status\\_report.pdf](https://naesb.org/pdf4/ferc032717_time_error_correction_status_report.pdf).

<sup>2</sup> The NAESB Report to FERC on WEQ Standards for Business Practices and Communication Protocols for Public Utilities, WEQ Version 003.2 is available at the following link: [https://naesb.org/pdf4/ferc120817\\_weq\\_version\\_003.2\\_filing.pdf](https://naesb.org/pdf4/ferc120817_weq_version_003.2_filing.pdf)

<sup>3</sup> American National Standards Institute, *ANSI Essential Requirements: Due Process Requirements for American National Standards* 5 (2018). This document is available on the ANSI website through the following link:

The NAESB governing principle of openness is adhered to throughout the standards development process and includes publicly noticed meetings, agendas, and items set for discussion and/or possible vote. This allows for all interested parties, regardless of membership, to have the opportunity to participate in standards development. To ensure a balance of interests so that no one group has the ability to exert undue influence over any decision in the standards development process, NAESB structure is comprised of quadrants that are divided into segments. The segments are self-determined by each quadrant and represent the various interests within a given market. This structure helps provide everyone an equal seat at the table during the standards development process. Currently, the NAESB membership body is comprised of over 300 entities representing a broad spectrum of the gas and electric markets, including wholesale and retail end users and various public agencies such as state public utility commissions. Further, in the spirit of both openness and balance, participation in the NAESB standards development process, including voting at the subcommittee level, is open to all interested parties, regardless of membership within NAESB.

As with all NAESB standards development efforts since the organization's inception as the Gas Industry Standards Board over two decades ago, the Time Error Correction effort was conducted to conform with the NAESB governing principles described above. As part of this effort, NAESB distributed notice to over 750 individuals from more than 200 different entities regarding the subcommittee standards development effort, the formal comment period for the resulting recommendation to reserve and modify the standards, and the intent of the NAESB Wholesale Electric Quadrant Executive Committee to consider and vote on the recommended standard reservations and modifications.

NAESB appreciates the opportunity to provide these comments to the Commission. As has been done in the past, NAESB will support the Commission's direction in whichever manner deemed appropriate by the Commission. If there are any questions or additional information is required, please do not hesitate to contact the NAESB office (713-356-0060 or [naesb@naesb.org](mailto:naesb@naesb.org)).