




April 14, 2015

NAESB
801 Travis Street
Suite 1675
Houston, TX 77002

SUBJECT: Comments on Recommendation for WEQ Annual Plan Item 7b

OATI is submitting these comments in regards to the public comment period for the Recommendation for Wholesale Electric Quadrant (WEQ) Annual Plan Item 7b, Redirect on a Firm Basis.

OATI understands the complexity of the business process for Redirects on a Firm Basis, and supports the OASIS Subcommittee's direction on handling Redirects on a Firm Basis for unconditional parent reservations as stated in the Recommendation. However, OATI is concerned that, if the standard is silent on the process to be used for Redirects on a Firm Basis for conditional parent reservations and defers to individual Transmission Provider's practices, then a wide disparity between Providers in how such requests are treated may result. This is exactly the opposite intent of developing Industry standards. There is also a concern that, depending on the extent of Transmission Provider differences in implementing their own business practices, the overall costs for such implementation would be higher than if a standardized approach could be established. 

OATI respectfully requests that the Executive Committee consider remanding this recommendation back to the OASIS Subcommittee or form an Executive Committee Task Force to address the treatment of conditional parent reservations in the Redirects on a Firm Basis standard.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul R. Sorenson", with a long, sweeping horizontal line extending to the right.

Paul R. Sorenson
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Attach.
PRS:SM
c: Kevin Sarkinen
Mary Brown
Sasan Mokhtari

Filename: OATI Comments on Redirect Recommendation SM 041415