**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Recommendations:** 2015 WEQ Annual Plan Item 2(a)(i)(2) – Long-Term Firm Rollover Rights Competition

**Submitted By:** IESO,MISO, PJM, SPP

**Date:** January 19, 2016

The ISOs/RTOs request that the following comments be considered prior to the Wholesale Electric Quadrant’s Executive Committee approving the Long-Term Firm Rollover Rights Competition Recommendation.

1. We appreciate the OASIS Subcommittee creating a definition for Eligible Rollover Capacity when documenting the requirements for Long-Term Firm Rollover Rights for Point-to-Point competition. Similarly, we believe a term should be defined for Designated Network Resource competition. The standards use the phrase “encumbered transmission capability,” which is not a defined term. We recommend that encumbered transmission capability be a defined term.
2. The subcommittee has defined the term Rollover Exercising Customer. It is clearly documented in WEQ-001 who the Rollover Exercising Customer is. We request a review of WEQ-002, WEQ-003, and WEQ-to determine if specific references to customer and Transmission Customer be changed to Rollover Exercising Customer. The sections to review include:
	1. Section 002-101-3.3.1
		1. The new paragraph added references “customer”
		2. The Usage column for RENEWAL\_DUE\_TIME references Transmission Customer
	2. Section 002-101-3.3.10
		1. The new paragraph added references “customer”
		2. The Usage column for RENEWAL\_DUE\_TIME references Transmission Customer
	3. Section 003-0
		1. Definition of Data Element for RENEWAL\_DUE\_TIME references Transmission Customer
	4. Section 013-106
		1. The new paragraph added references “customer”
3. We recommend that formatting inconsistencies be addressed. For example:
	1. Sections xx001-20.8.3.1 and xx001-20.8.3.2 contain both 10 point and 11 point fonts
	2. Sections xx001-20.6.3 and xx001-20.6.4 are not blocked similar to other requirements; starting with line 2, the text is indented, which is inconsistent standard formatting.
4. Many Transmission Providers have a deadline for customers to enter long term requests for study. There are also many processes that were developed to ensure the set of data studied was representative of the expected transmission utilization. Due to the new long term competition proposals in this standard, we recommend adding language that allows for a Transmission Provider to require a deadline by which all renewals, extensions, and competitions must be completed. This language would ensure that the myriad of study process in place across the nation are not damaged. Of particular concern is that a DNR renewal (or PTP vs a PTP, etc.) initiates a competition within the NAESB timeline, however the competition results in a long term PTP request being withdrawn from a study due to its successful competition for those DNR rights. The standards do not appear to allow a Transmission Provider to ensure the completion of the competition before its study processes are started.
	1. The language proposed would be a requirement for both PTP and DNR requests, and could be placed as xx1-20.10.10: The Transmission Provider may specify in its business practices that the competition timeline in xx001-xx Apendix –xx must be completed by a set point ahead of the initiation of its study processes. If the Transmission Provider does not post this required completion time in its business practice then the timeline in section XX will be used for competition.