**Options to address R18011**

**OPTION 1:**

**For: 1**

**Against: 13**

**Comment:**

* Very complex programmatically, meets need.
* Doesn’t address the request

Complexity: 5 - Highest

Change the system to complete the market assessments for the GPE, LSE, TPSE, MO, and Transmission Service Provider Conduct Market Assessments.

* 1. Each entity has its own timer for completing the market assessments
		1. No “Act on by” timestamp is sent to Approval entities

**Possible Implementation – Option 1:**

1. Sink BA receives initial e-Tag request and the e-Tag is updated with an e-Tag Creation Date/Time stamp (Authority/XML).
2. Sink BA distributes an Assessment Request to all Approval Entities listed on the e-Tag. On each individual Approval Entity’s receipt of the Assessment Request, the e-Tag is updated with an Initial Distribution Received Date/Time stamp.
	* 1. Implementation options:
			1. An automated “received response” to the Sink BA will be used as the Initial Distribution Received Date/Time stamp (Authority/Internal) this is unique to each approval entity.
			2. When initial distribution is received by each entity the Approval Entity will distribute an official Initial Distribution Received Date/Time stamp (Approval/XML) that will be sent back to the Sink BA and recorded on the e-Tag.

**EVALUATION RULE 1:** The time between the e-Tag Creation Date/Time stamp (Authority/XML) and the *latest* Initial Distribution Received Date/Time stamp (the last Approval Entity to receive an Approval Request) must be less than or equal to one minute. (*Note: The Entity responsible for being compliant with EVALUATION RULE 1 is the SINK BAA.*)

1. Passive or Active Approval or Denial response is sent by each Approval Entity back to the Sink BA.
2. Upon the Sink BA’s receipt of each individual Approval/Denial response, the e-Tag is updated with each Approval Entity’s Assessment Received Date/Time stamp (Authority/XML).

**EVALUATION RULE 2:**  For each individual Approval Entity, the time between an Approval Entity’s Initial Distribution Received Date/Time stamp and that Approval Entity’s Assessment Received Date/Time stamp (Authority/XML) must be less than or equal to the Assessment Period listed in column B of the WEQ-004 Timing Tables. (*Note: The Entities responsible for being compliant with EVALUATION RULE 2 is each individual Approval Entity listed on the e-Tag.*)

**EVALUATION RULE 3:** The *latest* Assessment Received Date/Time stamp (Authority/ XML) received by the Sink BA from all Approval Entities listed on the e-Tag must be greater than or equal to the Confirmed Interchange Preparation Time listed in column D of the WEQ-004 Timing Tables, plus one minute. (*Note: The Entities responsible for being compliant with EVALUATION RULE 3 is each individual Approval Entity listed on the e-Tag.*)

1. On stamp action of the *latest* Assessment Received Date/Time stamp (Authority/XML), the Sink BA compiles and sends the Final Distribution to all Approval Entities and the e-Tag is updated with a Final Distribution Sent Date/Time stamp (Authority/Internal).
2. On each individual Approval Entity’s receipt of the Final Distribution sent by the Sink BA, the e-Tag is updated with a Final Distribution Received Date/Time stamp.

**EVALUATION RULE 4:** The time between Final Distribution Sent Date/Time stamp (Authority/Internal) and the *latest* Final Distribution Received Date/Time stamp must be less than or equal to one minute. (*Note: The Entity responsible for being compliant with EVALUATION RULE 4 is the Sink BA.*)

**Potential Drawbacks:**

* Approval impacts could extend the current total approval window, adding time to the approval process if an Approval Entity experiences a delay in receipt of the assessment request. (per requester extending the windows would not be helpful).
* An additional rule may be needed if Approval Entities passive approval time limits exceed the total time in WEQ-004 Timing Tables Columns A & B, due to delays from the initial distribution.
* High complexity with additional messages and time stamps to synch and communicate.
* Potentially new timestamps for message exchanges, could be expanding scope.
* Late Tag timing window complexities with the boundaries and definitions of the receipt time.

**OPTION 2:**

**For:** 8

**Against:** 2

Complexity: 3 – Less than Option 1 and 4.

Impact: Change to software implementation, the e-Tag Specification and the WEQ-004 timing table

Change start of the “Act on by” timestamp of the market assessment to the same time as receipt of Authority Service (removing the 1-minute distribution window), *utilizing the existing data fields and schemas.*

* 1. Same timer set for all entities to complete the market assessments
		1. Same “Act on by” timestamp sent to all Approval entities

**Possible Implementation – Option 2:**

1. Sink BA receives initial e-Tag request and the e-Tag is updated with an e-Tag Creation Date/Time stamp (Authority/XML).
2. Passive or Active Approval or Denial response is sent by each Approval Entity back to the Sink BA.
3. Upon the Sink BA’s receipt of each individual Approval/Denial response, the e-Tag is updated with each Approval Entity’s Assessment Received Date/Time stamp (Authority/XML).

**EVALUATION RULE 1:**  For each individual Approval Entity, the time between the e-Tag’s e-Tag Creation Date/Time stamp (Authority/XML) and each individual Approval Entity’s Assessment Received Date/Time stamp (Authority/XML) must be less than or equal to the Assessment Period listed in column B of the WEQ-004 Timing Tables. (*Note: The Entities responsible for being compliant with EVALUATION RULE 2 is each individual Approval Entity listed on the e-Tag.*)

**EVALUATION RULE 2:** The *latest* Assessment Received Date/Time stamp (Authority/XML) received by the Sink BA from all Approval Entities listed on the e-Tag must be greater than or equal to the Confirmed Interchange Preparation Time listed in column D of the WEQ-004 Timing Tables, plus one minute. (*Note: The Entities responsible for being compliant with EVALUATION RULE 3 is each individual Approval Entity listed on the e-Tag.*)

1. On stamp action of the *latest* Assessment Received Date/Time stamp (Authority/XML), the Sink BA compiles and sends the Final Distribution to all Approval Entities and the e-Tag is updated with a Final Distribution Sent Date/Time stamp (Authority/Internal).
2. On each individual Approval Entity’s receipt of the Final Distribution sent by the Sink BA, the e-Tag is updated with a Final Distribution Received Date/Time stamp.

**EVALUATION RULE 3:** The time between Final Distribution Sent Date/Time stamp (Authority/Internal) and the *latest* Final Distribution Received Date/Time stamp must be less than or equal to one minute. (*Note: The Entity responsible for being compliant with EVALUATION RULE 4 is the Sink BA.*)

**Potential Drawbacks:**

* Loss of time for approvals compared to the current allotted time if the message distribution is delayed
* Some Approval Entities may receive less time than others due to distribution times

**Potential Benefits:**

* Potentially more simplistic implementation
* All responses are received within the same time period allotted in WEQ-004 Timing Table Column B
* Maintains alignment of timing language in Column B of the NAESB WEQ-004 Timing Table and INT 006-4 Timing Table

**OPTION 3:**

**For:** 6

**Against:** 6

Complexity: Low (2) more than Option 5 and less than option 2

Impact: WEQ-004

Change NAESB WEQ-004 to clarify the timing market assessment periods as currently implemented with no e-Tag software functionality changes.

Column B timing requirements begin after the completion of the posted Column A timing requirements, regardless of the Sink BA’s system performance in completing Column A’s requirements.

Measurement starts with the submittal time of the RFI to the Authority Service.

Must define the window times

**Potential Benefits:**

* Lower impact to industry, continues to function as normal
* Ensures timing table column B assessment period is fully provided to approvals
* Clarifies the requirements of the table

**Potential Drawbacks:**

* Allows column B assessment period to take place before the distribution window to ends
* Questions around INT 6
* May not address the Request

**OPTION 4:**

**For:** 0

**Against:** 12

Complexity: High – less than option 1 but higher than option 2

Impact: WEQ-004, e-Tag Specification, Software Implementation.

Queue any assessment responses by the Approval Entity received prior to the initial 1 minute distribution window.

**Possible Implementation – Option 4:**

1. Sink BA receives initial e-Tag request and the e-Tag is updated with the following Date/Time stamps:
	* e-Tag Creation Date/Time stamp (Authority/XML) – Time equal to the Sink BAA’s initial receipt of the e-Tag request.
	* Initial Distribution Window Date/Time stamp (Authority/Internal) – Time equal to the e-Tag Creation Date/Time stamp (Authority/XML), plus one minute.
2. This changed to focus upon the Authority Service….Sink BA distributes an Assessment Request to all Approval Entities listed on the e-Tag. On each individual Approval Entity’s receipt of the Assessment Request, the e-Tag is updated with an Initial Distribution Received Date/Time stamp. If the Approval Entity’s receipt of the Assessment Request is less than or equal to the Initial Distribution Window Date/Time stamp, the Initial Distribution Received Date/Time stamp will be equal to the Initial Distribution Window Date/Time stamp.

**EVALUATION RULE 1:** No Approval Entity’s Initial Distribution Received Date/Time stamp shall be later than the Initial Distribution Window Date/Time stamp. (*Note: The Entity responsible for being compliant with EVALUATION RULE 1 is the SINK BA.*)

1. Passive or Active Approval or Denial Assessment Response is sent by each Approval Entity back to the Sink BA.
2. Upon the Sink BAA’s receipt of each individual Assessment Response, the e-Tag is updated with each Approval Entity’s Assessment Received Date/Time stamp (Authority/XML). For any Assessment Responses that are received by the Sink BAA earlier than the Initial Distribution Window Date/Time stamp (Authority/Internal), The Assessment Responses will be placed in a queue by the Sink BAA until a time that is equal to the Initial Distribution Window Date/Time stamp (Authority/Internal). When the Initial Distribution Window Date/Time stamp (Authority/Internal) time is reached, these early Assessment Responses in the queue will be processed and updated with an Assessment Received Date/Time stamp (Authority/XML) that is equal to the later of the Initial Distribution Window Date/Time stamp (Authority/Internal) or the actual time in which they were processed.

**EVALUATION RULE 2:**  For each individual Approval Entity, the time between an Approval Entity’s Initial Distribution Window Date/Time stamp and that Approval Entity’s Assessment Received Date/Time stamp must be less than or equal to the Assessment Period listed in column B of the WEQ-004 Timing Tables. (*Note: The Entities responsible for being compliant with EVALUATION RULE 2 is each individual Approval Entity listed on the e-Tag.*)

**EVALUATION RULE 3:** The *latest* Assessment Received Date/Time stamp (Authority/XML) received by the Sink BAA from all Approval Entities listed on the e-Tag must be greater than or equal to the Confirmed Interchange Preparation Time listed in column D of the WEQ-004 Timing Tables, plus one minute. (*Note: The Entities responsible for being compliant with EVALUATION RULE 3 is each individual Approval Entity listed on the e-Tag.*)

1. On stamp action of the *latest* Assessment Received Date/Time stamp (Authority/XML), the Sink BAA compiles and sends the Final Distribution to all Approval Entities and the e-Tag is updated with a Final Distribution Sent Date/Time stamp (Authority/Internal).
2. On each individual Approval Entity’s receipt of the Final Distribution sent by the Sink BAA, the e-Tag is updated with a Final Distribution Received Date/Time stamp.

**EVALUATION RULE 4:** The time between Final Distribution Sent Date/Time stamp (Authority/Internal) and the *latest* Final Distribution Received Date/Time stamp must be less than or equal to one minute. (*Note: The Entity responsible for being compliant with EVALUATION RULE 4 is the Sink BAA.*)

**Potential Drawbacks:**

* Does not resolve Power Ex issue that approval entities are receiving more time than column B
* Lacks transparency regarding total time for evaluation in column B
* Entities would potentially have additional wait time to see the approval of their request compared to current system design
* Additional timestamps computations required
* Confusion for operators not seeing their timestamps recorded until the one minute window closes

**Potential Benefits:**

* All entities would only have column b time window for *recording* approval

**OPTION 5:**

**For:** 3

**Against:** 8

Complexity: Lowest

Impact: None

As is no change needed to NAESB WEQ-004 or e-Tag software functionality

* 1. Same timer set for all entities to complete the market assessments
		1. Same “Act on by” timestamp sent to all Approval entities
	2. NAESB Standards are not enforcing NERC Standards, but should not prevent adherence
	3. Entities in Column B are responsible for ensuring compliance with NERC INT-006-4 timing requirements and the NAESB WEQ-004 timing requirements

Potential Benefits:

* No impacts to tagging systems that are in place today

Potential Drawbacks

* Questions regarding compliance, Entities are responsible for their compliance, and software may not match standards
* Does not address the confusion between the standards and the implementation(programming)