



MEMO

TO: North American Energy Standards Board (NAESB)

FROM: Paul R. Sorenson, Senior Vice President Central Markets Strategy

DATE: September 11, 2019

SUBJECT: Request regarding the implementation of WEQ-004 Appendix D - Commercial Timing Tables for Western Electricity Coordinating Council (WECC)

Open Access Technology International, Inc. (OATI) respectfully submits the following comments in response to the above cited Standards Recommendation currently posted by NAESB for formal comment.

The Recommendation proposes to modify the footnotes associated with the timing table for "...all Interconnections except WECC", footnotes 1 through 4, and with the timing table "...for WECC", footnotes 5 through 8. The footnotes for the two tables are identical. However, the footnote citations for the WECC Timing Table Column B reference footnotes 3 and 8. OATI believes it would be more appropriate to change this reference to cite Table's footnotes 7 and 8.

Based on the back-and-forth discussions on how to interpret the interaction between Columns A and B timing requirements as actually implemented in e-Tag that were brought out in Subcommittee deliberations on this topic, OATI suggests that the following modifications to footnote 3 and 7 may be appropriate to remove any ambiguity on how e-Tag vendors are to implement tag approval timing:

³ Measurement starts at the time of receipt, by the Sink BA's e-Tag Authority Service, of the RFI or any subsequent modifications, i.e., the Authority Service will set the ActOnByTime in the e-Tag to be the time of receipt of the RFI plus the Market Assessment response time.

⁷ Measurement starts at the time of receipt, by the Sink BA's e-Tag Authority Service, of the RFI or any subsequent modifications, i.e., the Authority Service will set the ActOnByTime in the e-Tag to be the time of receipt of the RFI plus the Market Assessment response time.