**COMMENTS**

**Quadrant:** Wholesale Electric Quadrant

**Recommendation:** **Number:** WEQ 2012 Annual Plan Item 4.c.i-ii / R11014 / R11015 (Part 2)

**Title:** Develop modifications for WEQ-012 as needed to reflect current market conditions (Authorized Certification Authority Standard and Credentialing Practice (R11014). Technology Review and Upgrade for NAESB Public Key Infrastructure Standard WEQ-012 (R11015))

**Submitted By:** Standards Review Subcommittee

**Date:** August 9, 2012

Under the Standards Review Subcommittee (SRS) Scope of Work, which was approved by the SRS on February 1, 2011, the SRS agreed to review recommendations and if subcommittee deemed appropriate, they would submit advisory comments to the Executive Committee (EC) for consideration. As stated in the Scope of Work these comments are “not intended to change the scope of the Business Practices or recommendation, but to provide consistency and uniformity across all WEQ Business Practices.”

The Standards Review Subcommittee has identified that the following two definitions are in the current glossary standard (WEQ-000) and are different from those proposed in the recommendation.

**General Comments:**

* If “certificate authority” and “certification authority” represent the same entity, the SRS suggests using one term or the other to eliminate possible confusion.
* Numerous sections have the original text deleted and the new language added “are specified in the Accreditation Document.” It is unclear why these sections are not marked “Reserved.” The SRS suggests that these sections should be marked “Reserved.”
* Accreditation Document needs to be consistently capitalized. Sometimes it is listed as “Accreditation document” and other times it is listed as “accreditation document” or “Accreditation Document.”
* There are multiple references the NAESB Certification Program. What is posted on the NAESB website is tagged as “Board Certification Committee Authorized Certificate Authority Process.” The SRS suggests that it would be helpful to consistently use the same reference name that is currently posted on the NAESB website.
* The standards reference published works of the Internet Engineering Task Force of the Internet Society. The WEQ recently removed references to “International Performance Measurement and Verification Protocol” (IPMVP) from WEQ-021. The reason for deleting the reference was:

*The Wholesale Electric Quadrant does not want to introduce confusion to the NAESB Business Practice Standard by referencing another organization’s standard and protocols that may change and represents concepts differently than what the NAESB process intended.*

Using the same logic as applied to WEQ-021, the SRS suggests that specific references to other document’s sections such as “(RFC3647 Section 1)” be removed from the standards. Also, the following last four paragraphs in the Business Practice Standards be deleted:

 This Business Practice Standard WEQ-012 references published works of the Internet Engineering Task Force of The Internet Society.

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**Specific Comments:**

Introduction

* In the second paragraph “Certification Authorities” is capitalized but it is not a defined term.

Scope

* Last paragraph needs to be reformatted.

Commitment to Open Business Practice Standards

* “and Technology” should be deleted. This appears to be a carry over of when the abbreviation of NIST was added.

Section 12.1.9.1

* SRS suggests changing “employ” to “employs.”
* There is a reference to the NAESB TSIN registry. The TSIN registry is a NERC product. NAESB will be implementing the EIR. This reference needs to be corrected.