



**Comments on Standards Recommendation
WEQ 2009 AP Item (1.a) R05020; WEQ 2009 AP Item (3.a.vii)
October 8, 2009**

The following are comments submitted by Open Access Technology International, Inc. (OATI) on the above Standards Recommendation open for public comment.

General Comment on the Recommendation:

Redlined changes are not apparent in the posted version of this recommendation. Prior to submittal for action by the WEQ Executive Committee the JESS or NAESB Staff should clearly indicate in 'hard' redline and underscored or strike-out text the suggested changes being recommended. In both the Recommendation proper and the attachment to the Recommendation for modifications to WEQ-004, all references to the "Electronic Tagging Functional Specification" should be made consistent and be either "Version 1.8.1 Electronic Tagging Functional Specification" or "Electronic Tagging Functional Specification Version 1.8.1" (see comment on WEQ-004-2).

Specific Comments on the Attachment to the Recommendation, Standard WEQ-004:

004-1: It is unclear of the exact intent in removing the reference to where the required RFI should be submitted. If the intent is to remove the Interchange Authority (IA) from the standard, there are numerous references to the IA first in the Applicability paragraph and later in the body of the standard (see 4.6.1, 4.8, 4.9, 4.10, and 4.18) that remain in the Recommendation as drafted. If this is to be a global change to remove the Interchange Authority reference, then there needs to be more modifications than just what is shown in the Recommendation.

004-2: Wording of this Standard has a problem - "...shall be an the e-tag...". The cite for version of the Tagging specification should either be "Version 1.8.1 Electronic Tagging Functional Specification" or "Electronic Tagging Functional Specification Version 1.8.1" and be made consistent with all other such references.

Once the Tagging Specification is cited as the means for communicating the RFI, all references to the Interchange Authority could be changed to cite the (e-Tag) Authority Service, assuming removal of the IA from the Standard is the intent. However, this does not alleviate the problem that while modifications and Approval Entity actions, etc. are submitted to the Interchange Authority (or Authority Service) (4.6.1, 4.8, 4.9, etc.), the recommended standard as drafted is silent as to where the RFI is submitted in the first place.

Since Standard 004-2 is where the e-Tag becomes synonymous with RFI, it is recommended that the initial submission requirement be included/identified early in the standard in 004-2 or sub-standard:

004-2 Until other means are adopted by NAESB, the primary method of submitting the Request For Interchange (RFI) shall be an e-Tag communicated to and managed by the Authority Service designated by the Sink Balancing Authority using protocols compliant with the Version 1.8.1 Electronic Tagging Functional Specification.

Including the submission responsibility or obligation on the Sink Balancing Authority may be considered duplicative of work being done in the NERC Coordinate Interchange Standard drafting, but there are other instances where the same information is repeated in both the NAESB Standards and NERC Standards, e.g., the Tag Timing table. Removing the identification of where the initial RFI must be submitted in 004-1 introduces unnecessary ambiguity into the WEQ-004 Standards for no apparent benefit and should be rectified in the final Recommendation presented to the WEQ EC.