



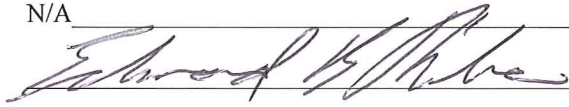
North American Energy Standards Board

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**NAESB Wholesale Electric Quadrant
Ratification Ballot - Due August 20, 2010
Submit via Email (naesb@naesb.org) or Fax (713-356-0067)**

Please vote in favor of or in opposition to the Executive Committee (EC) action taken on July 7, 2010 and approved via notational ballot on July 16, 2010:

Support	Oppose	Recommendations:
		<p>2010 WEQ Annual Plan Item 6(a) Requirements Specifications for Common Electricity Product and Pricing Definition – for NIST PAP03</p> <p>Recommendation (Redline): http://www.naesb.org/member_login_form.asp?doc=weq_rat072110_weq_2010_api_6a_rec_redline.doc</p> <p>Recommendation (Clean): http://www.naesb.org/member_login_form.asp?doc=weq_rat072110_weq_2010_api_6a_rec_clean.doc</p>
		<p>2010 WEQ Annual Plan Item 6(b) – Requirements Specifications for Common Scheduling Mechanism for Energy Transactions – for NIST PAP04:</p> <p>Recommendation (Redline): http://www.naesb.org/member_login_form.asp?doc=weq_rat072110_weq_2010_api_6b_rec_redline.doc</p> <p>Recommendation (Clean): http://www.naesb.org/member_login_form.asp?doc=weq_rat072110_weq_2010_api_6b_rec_clean.doc</p>
		<p>2010 WEQ Annual Plan Item 6 (c) – Requirements Specifications for Wholesale Standard DR Signals – for NIST PAP09</p> <p>Recommendation: (Redline): http://www.naesb.org/member_login_form.asp?doc=weq_rat072110_weq_2010_api_6c_rec_redline.doc</p> <p>Recommendation (Clean): http://www.naesb.org/member_login_form.asp?doc=weq_rat072110_weq_2010_api_6c_rec_clean.doc</p>

Member Name:	Edward Skiba _____
Segment:	Independent Grid Operators / Planners _____
Sub-Segment:	N/A _____
Member Signature:	 _____
Member Company:	Midwest ISO _____
Date:	August 19, 2010 _____
Midwest ISO is abstaining from supporting or opposing these recommendations. For additional information on why it is abstaining, see accompanying comments.	

Ratification Ballot Comments

Quadrant: Wholesale Electric Quadrant

Recommendations: WEQ 2010 AP Item 6 (a) / REQ Annual Plan Item 9(a); Requirements Specification for Common Electricity Product and Pricing Definition – for NIST PAP03,
WEQ 2010 AP Item 6 (b) / REQ Annual Plan Item 9(b); Requirements Specification for Common Scheduling Mechanism for Energy Transactions – for NIST PAP04, and
WEQ 2010 AP Item 6 (c); Requirements Specifications for Wholesale Standard DR Signals – for NIST PAP09

Submitted By: Midwest ISO

Date: August 19, 2010

Midwest ISO is supportive of the content within the recommendations for:

- 2010 WEQ AP Item 6 (a) Requirements Specifications for Common Electricity Product and Pricing Definition – for NIST PAP03
- 2010 WEQ Annual Plan Item 6(b) – Requirements Specifications for Common Scheduling Mechanism for Energy Transactions – for NIST PAP04, and
- 2010 WEQ Annual Plan Item 6 (c) – Requirements Specifications for Wholesale Standard DR Signals – for NIST PAP09.

Midwest ISO believes that NAESB has accomplished the tasks it was assigned and recognizes that NAESB approval is needed to formalize the documents developed by NAESB so that they can be considered complete. We also recognize that during the February 13, 2010, NAESB Advisory Council provided direction to file the PAP related documents with the Commission:

“Mr. Wollman expressed a preference that NAESB include its PAP efforts into its established filing procedures at FERC, which is also agreeable to FERC staff. The standards should be submitted in late second quarter 2010 to the FERC as part of the WEQ Version 2.2 standards filing.”

Midwest ISO is concerned that the Advisory Council made a decision without fully understanding the content of the documents being developed under the 2010 WEQ AP Items 6 (a-c) and questions if the recommendations should in fact be treated as Business Practice Standards. All three of the recommendations have the following language: “The use cases included in these Business Practice Standards are not to be required or exhaustive and are provided for clarification purposes.” If the content of the recommendations is not required or exhaustive and is only provided for clarification purposes, Midwest ISO questions whether the WEQ Business Practice Standards Version 2.2 is the best tool for NAESB to move these documents forward. Based on historical information the Business Practice Standards are filed with the Commission, the Commission issues a NOPR, followed by an Order, and Public Utilities are required to incorporate the NAESB Business Practice Standards by reference into

their tariffs. By the process NAESB has chosen for addressing the 2010 WEQ AP Items 6 (a-c) use cases that are not required and are only intended for clarification could be included in a Public Utility's tariff.

From the February 13, 2010, meeting notes, it is unclear as to the reasoning behind the Advisory Council's decision. If the intent was to protect NAESB's intellectual capital investment the documents could be copyrighted. NAESB uses this process on a regular basis as was done with the *Electronic Tagging Functional Specification Version 1.8.1*. If the intent was to provide the documents to the Commission to reaffirm that NAESB is completing its Smart Grid assignments this could be handled through informational filings similarly to what NAESB submitted in its July 8, 2010, *Progress Report on Standards Development to Support Coordination of Requests for Transmission Service Across Multiple Transmission Systems (Docket No. RM05-5-013, Order No. 676-E)*.

Midwest ISO is concerned with statements in the recommendations that if they were to be included in the Midwest ISO tariff, even by reference, are beyond the control of Midwest ISO. For example, "CalConnect and the Organization for the Advancement of Structured Information Standards will work together to define the common communication of date time and interval to meet the needs of smart grid transaction communications as well as for building systems integration, enterprise interaction, and financial transactions." How can Midwest ISO be accountable for having these organizations work together?

As mentioned in the outset of these comments, Midwest ISO is supportive of the content of the documents developed and agrees it is important for the content to be approved by NAESB to provide input to other organizations working on subsequent tasks associated with these Smart Grid PAPs. However, Midwest ISO believes that the mechanism selected (WEQ Business Practice Standards Version 2.2) is not the appropriate mechanism for providing this information to these groups or to the Commission. Midwest ISO, regrettably, is abstaining from voting in support of these three recommendations.