

North American Energy Standards Board

801 Travis Street, Suite 1675, Houston, Texas 77002 Phone: (713) 356-0060, Fax: (713) 356-0067, E-mail: naesb@naesb.org Home Page: www.naesb.org

NAESB Wholesale Electric Quadrant Ratification Ballot - Due November 29, 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 October 22, 2010 and approved via notational ballot on October 29, 2010:

Support	Oppose	Recommendations:
		WEQ 2010 Annual Plan Item 6(d) - Business Practices and Information Models to Support Priority Action Plan 10 – Standardized Energy Usage Information
		Recommendation http://www.naesb.org/member_login_check.asp?doc=weq_rat102910_weq_2010_ap_6d_rec.d oc

W. L. W.	
Member Name:	Edward Skiba
Segment:	Independent Grid Operators / Planners
Sub-Segment:	N/A
Member Signature:	Ishood & //hh
Member Company:	Midwest ISO
Date:	November 20, 2010
	Midwest ISO is abstaining from supporting or opposing the recommendation and is submitting comments as to why it is abstaining.



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Ratification Ballot Comments

Quadrant:

Wholesale Electric Quadrant

Recommendations:

WEQ 2010 Annual Plan Item 6(d) - Business Practices and Information Models to Support Priority Action Plan 10 – Standardized Energy Usage

Information,

Submitted By:

Midwest ISO

Date:

November 20, 2010

Midwest ISO is supportive of the content within the recommendation for WEQ 2010 Annual Plan Item 6(d) - Business Practices and Information Models to Support Priority Action Plan 10 – Standardized Energy Usage Information. Midwest ISO believes that NAESB has accomplished the task it was assigned and recognizes that NAESB approval is needed to formalize the documents developed by the Smart Grid Subcommittee on Priority Action Plan 10 so that they can be considered complete. We also recognize that during the February 13, 2010, meeting the 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 (d), and questions if the recommendations should in fact be treated as Business Practice Standards. The recommendation has the following language:

"The energy usage information model and these model business processes and practices are not required of System Operators. As the energy usage information model and these business processes and practices evolve, System Operators may determine that use of the energy usage information model in these Business Practice Standards can be applied to other information."

The recommendation was developed with the understanding by some participants in the subcommittee, that, as written, these Business Practice Standards were not applicable to the Wholesale Electric Quadrant. Rather, the recommendation was being developed so that the Retail Electric and Wholesale Electric Quadrants had similar Smart Grid Business Practice Standards. The Business Practice Standards being ratified indicate the standards are not presently applicable to wholesale markets:

"The business processes and practices described below are not presently applicable to wholesale markets because wholesale markets do not generally communicate directly with end-use customers and are not the system of record for individual end-use customer energy usage information or individual end-use customer load forecast. The energy usage information model and these model business processes and practices are not required of System Operators. As the energy usage information model and these business processes and practices evolve, System Operators may determine that use of the energy usage information model in these Business Practice Standards can be applied to other information."



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As mentioned in the outset of these comments, Midwest ISO is supportive of the NAESB work regarding moving Smart Grid forward 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 this Smart Grid PAP. 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 this recommendation.