



NAESB. It is such revisions and changes from prior versions of the WEQ Business Practice Standards and the incorporation by reference of Version 003.2 Standards into the Commission's regulations as enforceable mandatory requirements on which the Commission requests comments in the instant proceeding.<sup>4</sup> Accordingly, SPP commends to the Commission for full consideration<sup>5</sup> SPP's respective, earlier-filed comments on the Version 003.1 Standards<sup>6</sup> and the proposed retirement and removal of the incorporation by reference of the WEQ-006 Time Error Correction Business Practice Standards,<sup>7</sup> and offers these additional comments as to the implementation plan for the combined Version 003.1 and Version 003.2 Standards, and the proposed exclusion of the preamble to WEQ-001-9 for redirects on a firm basis, WEQ-001-14.1.3 and 001-15.1.2 for Available Transfer Capability ("ATC") narrative timing, and WEQ-001-106.2.5 for terminating Secondary Network Transmission Service capacity.

SPP incorporates by reference at Attachment R-1 of its Open Access Transmission Tariff the current versions of the NAESB WEQ Business Practice Standards incorporated by reference into the Commission's regulations as specified in Part 38.

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<sup>4</sup> See Version 003.2 Standards NOPR at P 1.

<sup>5</sup> See *Id.* (in recognition of the Commission's statement that, "[c]omments already filed on the revisions made by NAESB in the WEQ Version 003.1 Standards will be given full consideration and need not be replicated in response to this NOPR.").

<sup>6</sup> *Standards for Business Practices and Communication Protocols for Public Utilities*, Joint Comments of Southwest Power Pool, Inc. and the Midcontinent System Operator, Inc. Docket No. RM05-5-025 (Sept. 26, 2016).

<sup>7</sup> See *Standards for Business Practices and Communication Protocols for Public Utilities*, Comments of Southwest Power Pool, Inc. in Support of Notice of Proposed Rulemaking, Inc. Docket No. RM05-5-026 (Nov. 13, 2018).

## **II. COMMENTS**

### **A. Implementation Plan for the Combined Version 003.1 and Version 003.2 NAESB Standards**

In the Version 003.2 Standards NOPR, the Commission proposes to adopt the WEQ Version 003.2 Standards, which include the entirety of the WEQ Version 003.1 Standards, with the addition of certain revisions and corrections. The Open Access Same-Time Information System (“OASIS”) Implementation Plan contained in the Version 003.2 WEQ-002 OASIS Standards calls for an eighteen-month implementation divided into two phases. This Implementation Plan recommended for the implementation of the Version 003.2 Standards was predicated on completion of the Version 003.1 Standards, which called for a six-month implementation. In combining the requirements for implementation of both the Version 003.1 and Version 003.2 Standards, the current Version 003.2 Implementation Plan would be incorporated by reference and dictate an eighteen-month implementation.

SPP believes that by combining the Version 003.1 and Version 003.2 implementation, the Version 003.2 WEQ-002 Implementation Plan should be extended by the six-month implementation previously recommended for the Version 003.1 Standards. The two-phased approach (development and testing) should be retained, with each phase representing a twelve-month period.

### **B. Proposed Rejection of the Incorporation of Certain NAESB WEQ Business Practice Standards**

The Commission proposes to amend Part 38 of the Code of Federal Regulations to incorporate by reference the NAESB Standards listed in (b)(2) as follows: “(2) WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.2 (Version

003.2, Dec. 8, 2017) with the exception of Standards 001-9 (preamble), 001-14.1.3, 001-15.1.2 and 001-106.2.5).<sup>8</sup>

### **1. Preamble to NAESB Standard WEQ-001-9**

The Commission proposes to exclude Standard WEQ-001-9 (preamble) due to its inclusion of an option for the Transmission Provider to allow for firm redirects from conditional parent reservations if they post a business practice to that effect.

In the Version 003.2 Standards, the same preamble was added to Standard WEQ-001-10 for redirects on a non-firm basis. This preamble was added to the WEQ-001-10 Standards to avoid potential ambiguities in the treatment of redirects on a non-firm basis versus redirects on a firm basis. SPP would support NAESB activities in developing Standards to limit non-firm redirects to unconditional firm parent reservations. It would seem appropriate for the WEQ-001-10 (preamble) also to be excluded from the Version 003.2 Standards incorporated by reference until such time that NAESB establishes Standards for handling redirects from conditional parent reservations.

### **2. NAESB Standards WEQ-001-14.1.3 and WEQ-001-15.1.2**

SPP observes that an inconsistency in the Version 003.1 Standards NOPR regarding the proposed incorporation of revised standards on the timing of required ATC narrative postings has been carried forward in the Version 003.2 Standards NOPR.<sup>9</sup> At paragraph 27 of the Version 003.1 Standards NOPR, the Commission “propose[s] to incorporate by reference, into the Commission’s regulations at 18 CFR 38.1, NAESB’s revised standards on the timing of the required posting of the ATC narratives, as set forth in NAESB’s WEQ

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<sup>8</sup> Version 003.2 Standards NOPR at 38 at proposed 18 C.F.R. § 38.1(b)(2) (emphasis added).

<sup>9</sup> *See supra* note 8.

Version 003.1 Business Practice Standards,” yet, at page 43 of the Version 003.1 Standards NOPR, the Commission proposes that Part 38.1(b)(2) of its regulations be amended to exclude the 001-14.1.3 and 001-15.1.2 Standards. Absent discussion or other clarification in the Version 003.2 Standards NOPR, SPP believes these proposed exclusions to be in error, and requests that the Commission incorporate both the 001-14.1.3 and 001-15.1.2 Standards by reference in its regulations in connection with its incorporation of Version 003.2 Standards.

### **3. NAESB Standard WEQ-001-106.2.5**

Similarly, the Version 003.2 Standards NOPR also contains a proposal to exclude WEQ-001-106.2.5 from the Commission’s regulations.<sup>10</sup> Absent discussion or further clarification and given the Commission’s prior proposal in the Version 003.1 Standards NOPR to incorporate the Standard (albeit followed by an inconsistent proposed amendment to the text of its regulations to exclude the Standard),<sup>11</sup> SPP concludes the proposed exclusion of WEQ-001-106.2.5 also to be an oversight, and requests that the Standard be incorporated by reference in the Commission’s regulations. Absent the incorporation of this Standard, SPP notes that there would appear to be no recourse for the Transmission Provider to respond should a Network Integration Transmission Service Customer fail to submit an accurate termination request.

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<sup>10</sup> *Id.*

<sup>11</sup> Version 003.1 Standards NOPR at PP 31, 43.

### III. CONCLUSION

SPP respectfully requests that the Commission accept and consider the foregoing comments in this proceeding.

Respectfully submitted,

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