

From: Terry Bilke  
Sent: Friday, February 06, 2004 8:37 AM  
To: naesb@naesb.org  
Subject: Wholesale Electric Quadrant Request For Comments

I received the announcement below indirectly and then found the posting on the NAESB site, but it was not clear to me how to submit comments. If there is a particular form and recipient, please let me know.

In general, the posted standard appears to be pro forma. Our ultimate comments depend on the expected disposition of the standard.

If the standard is to be voluntary and used by those that chose to do so, then this standard is fine. On the other hand, if it is NAESB's intention to file this with the FERC with the intention that it be adopted by jurisdictional entities, we have one procedural and one substantive concern.

From a procedural standpoint, it appears inappropriate to announce a nearly 400 page standard, to a very limited audience, with one month to comment (and no apparent process to assure thoughtful comments are addressed) before sending it to the NAESB Executive Committee for approval.

The primary concern we noted in the proposed standard was the timing requirements for processing of long-term Firm service requests. The timing is shorter than most transmission providers that are required to coordinate the sale of service with other neighboring providers and also have to perform system impact studies.

Again, since there was only a month available to go through this document, there may well be things we missed in a quick reading of it.

Respectfully,  
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