

3/31/04

p. 0 of 2

To: NAESB Office
(Wholesale Electric Quadrant)
(713) 356-0067 (F)

From: John Hormozi
Los Angeles Dept. of Water & Power
(818) 771-6606 (F)
(818) 771-6775 (O)

Re: "Coordinate Interchange Business Practices"
(Std. Request # R03013)

Comment: RFI Standard 7.0, as submitted, requires the IA to communicate RFI status changes to, among others, Generator PSEs, Load-Serving PSEs, and PSEs holding the associated transmission rights. It is my understanding that, in this instance, the proposed standard does not accurately reflect WECC Business Practices in implementation of NERC Policy 3.

Typical transaction chains in the Western Interconnection include numerous PSEs that do not fall into the above categories. These PSEs, who are parties to "static" transactions, need updated RFI status information to support after-the-fact business checkouts and account reconciliation.

Attached is an excerpt from the proposed standard, marked in order to reflect the current (and probable future) "e-tagging" practice within the Western Interconnection.

In case of questions, please feel free to contact me at the phone number above, or at john.hormozi@ladwp.com.

W/Thanks, J. Hormozi

p. 2 of 2



RECOMMENDATION TO NAESB EXECUTIVE COMMITTEE
For Quadrant: Wholesale Electric Quadrant

Requesters: NAESB Members of the Joint Interface Committee
Request No.: R03013
Request Title: Coordinate Interchange Business Practices

RFI Standard 4.0 A completed RFI shall contain, at a minimum, the required information specified in the most current version of the **NAESB RFI Datasheet** (attached).

RFI Standard 5.0 On behalf of the Requesting PSE, the IA shall verify approvals from all involved Approval Entities (e.g. TSP-for transmission reservations, BA-for ramping start/end times and rate, RA-reliability analysis, Generator/Load PSE) prior to being confirmed and implemented in accordance with the NERC Coordinate Interchange Standard.

RFI Standard 5.1 The Requesting PSE shall submit required RFI information and data in accordance with the timing requirements of the most current version of the **NAESB RFI Submission and Response Timetable** (attached).

RFI Standard 5.2 Until such time as other protocols are established by NERC and/or NAESB, timing requirements for the submission and approval of the completed RFI shall be in accordance with NERC Policy 3 Appendix 3A1.

RFI Standard 6.0 All requests for approval/validation of the completed RFI by the IA during the Arranged Interchange Period shall be assessed in accordance with the timing requirements of the most current version of the **NAESB RFI Submission and Response Timetable**. The results of that assessment shall be promptly communicated by the IA back to all involved parties.

RFI Standard 6.1 Any denial of a RFI request by any Approval Entity shall be communicated to the IA and Requesting PSE and accompanied by the reason for such denial.

RFI Standard 7.0 The IA shall be responsible for communicating changes on the status of the RFI to all involved parties of the RFI, including BAs, IAs, RAs, counterparty PSE (Generator or Load Serving), and the TSPs, and the PSEs holding the associated transmission rights necessary to support the transaction. *In the Western Interconnection, this shall include all PSEs named in the RFI.*

RFI Standard 8.0 The primary method for submitting a RFI to the IA shall be by electronic means using protocols to be determined by NAESB.

RFI Standard 8.1 A backup or redundant electronic system shall be available for immediate use should the primary electronic means become disabled.

RFI Standard 8.2 Submitting a RFI to the IA via facsimile is acceptable only as a last resort when the electronic means and its required backup or redundant system are not available.