

North American Energy Standards Board

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VIA E-MAIL

August 16, 2007

Kris Zadlo Vice President, Transmission Calpine Corporation 717 Texas Ave. Suite 1000 Houston, Texas 77002 krisz@calpine.com

RE: NAESB Request No. R05026 - Thirteen proposed enhancements to Incrementally

improve OASIS

Dear Mr. Zadlo:

On October 11, 2005, Terry Dodson submitted a Request for Standards Development on behalf of Calpine to the North American Energy Standards Board (NAESB) to develop modifications to the existing NAESB OASIS business practice standards to incrementally improve OASIS functionality. This request was triaged to the NAESB Wholesale Electric Quadrant (WEQ) and numbered Request No. R05026 (the Request).¹

The Request was submitted as a result of the March 2005 NERC/NAESB Future of OASIS Conference. The conference addressed the July 2000 Advanced Notice of Proposed Rulemaking (ANOPR) RM00-10-000 on communications between customers and Transmission Providers, electronic scheduling, dynamic notification, and generator run status information. Calpine and Dynegy made a presentation at the Future of OASIS Conference that provided the message that standards implemented in a non-uniform or standardized scale continue to be inefficient and that allowing for regional differences generally equals less then efficient results. The Minutes from the Future of OASIS Conference and the letter from NAESB to FERC Chairman Wood on the results of the Future of OASIS Conference are posted on the NAESB website.² Following the conference, the NAESB office worked with Mr. Cox of Dynegy and Mr. Dodson of Calpine to develop the Request. Mr. Dodson submitted the resulting Request on behalf of Calpine.

The Request includes thirteen proposed modifications to existing OASIS standards and functionality. Due to the number and nature of the modifications proposed in the request, it was determined that the NAESB WEQ Standards Review Subcommittee (SRS) would develop a Scoping Document to add additional clarification to what modifications would need to be made to address the Request. The SRS, with the assistance of the WEQ Electronic Scheduling Subcommittee and Information Technology Subcommittee (ESS/ITS), developed the Scoping

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¹ Request No. R05026 is posted on the NAESB website at: http://www.naesb.org/pdf2/r05026.doc.

² Minutes from the Future of OASIS Conference are posted on the NAESB website at: http://www.naesb.org/pdf2/weq_ess_oasis2_032905rm.doc. The letter from NAESB to FERC Chairman Wood on the results of the Future of OASIS Conference is posted on the NAESB website at: http://www.naesb.org/pdf2/weq_jiswg050205w3.pdf.

Document over the course of several months. The Scoping Document is posted on the NAESB website.³

The Scoping Document was presented to the WEQ Executive Committee on May 8, 2007. The WEQ Executive Committee provided a disposition of each of the thirteen items within the request. The disposition of the items can be found in the WEQ Executive Committee posted on the NAESB website.⁴ It was determined that several items would need additional clarification before a disposition for those items could be determined:

C: Adapt OASIS systems to better interface directly with energy trading platforms

• This enhancement would include OASIS capability to reference Energy Sale Tag as a cross reference and provide for a more effective method of verifying complete tags. Such a standard does not exist in a uniform method. If developed, it would allow for better understanding of transmission service use by the market. This enhancement is commercial and should be developed on a national level. This is a new enhancement or standard and would affect all market participants

G: Use same TSR tag number when status is changed to recall; do not create a new TSR tag number for this event.

- When a service request is submitted and confirmed but there is a mistake and subsequent recall, the status of the tag does not change. Rather, a new order is created. It then becomes difficult to confirm a service request because of the need to locate the new order. This enhancement would improve the market through better communication to Transmission customers and provide for more efficiency in transmission service procurement. This enhancement is commercial in nature and should be national in its scope
- I: Allow for multiple Redirect TSR numbers to be entered on the same Original reservation tag.
 - To redirect with an end point at a different location requires a new reservation tag. The status of the old tag is not changed. A new number is assigned for redirect. It would be more efficient to update the old tag for market participants. This change is commercial in nature and should be national in its scope

Any additional information you can provide on the above referenced items or the other ten items in the Request would be greatly appreciated by the volunteers who plan to develop business practice standards to address the Request. In addition, participation by Calpine representatives on the subcommittees for the development of these items would provide additional assurance that the business practice standards developed address the needs of Calpine outlined in the request.

If you have any questions, or need additional information, please contact me at 713-356-0060 or lkennedy@naesb.org.

Best regards, Laura Kennedy

Laura Kennedy Director, Standards Development, NAESB

³ Scoping Document for R05026 is posted on the NAESB website at: http://www.naesb.org/pdf2/weg_srs112006a1.doc.

⁴ The WEQ Executive Committee draft minutes for the May 8, 2007 meeting are posted on the NAESB website: http://www.naesb.org/pdf2/weq_ec050807dm.doc.

cc: Rae McQuade, NAESB President