



## NORTH AMERICAN ENERGY STANDARDS BOARD

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July 23, 2019  
Filed Electronically

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E., Room 1A  
Washington, D.C. 20426

RE: Standards for Business Practices and Communication Protocols for Public Utilities Notice of Proposed Rulemaking (Docket No. RM05-5-027)

Dear Ms. Bose:

The North American Energy Standards Board (NAESB) herewith submits this report to the Federal Energy Regulatory Commission (“FERC” or “Commission”) regarding errata to Version 003.2 of the NAESB Wholesale Electric Quadrant (WEQ) Business Practice Standards, provided to the Commission on December 8, 2017. This report is intended to supplement the previous status update filed by NAESB on June 5, 2019 in the same docket. This report is voluntarily submitted by NAESB and impacts the Version 003.2 WEQ standards, currently the subject of the FERC Notice of Proposed Rulemaking (NOPR) issued by the Commission on May 16, 2019 in Docket No. RM05-5-027. The Version 003.2 WEQ standards were ratified by the NAESB membership and submitted to the Commission on December 8, 2017. The minor correction included in this report, MC19011, was adopted by the WEQ Executive Committee on June 3, 2019.

This report is being filed electronically in Adobe Acrobat® Portable Document Format (.pdf). All of the documents are also available on the NAESB website ([www.naesb.org](http://www.naesb.org)). Please feel free to call me at (713) 356-0060 or refer to the NAESB website ([www.naesb.org](http://www.naesb.org)) should you have any questions or need additional information regarding the errata to the NAESB WEQ Version 003.2 standards or any other NAESB work products.

Respectfully submitted,

Ms. Rae McQuade  
President & COO, North American Energy Standards Board

cc: Chairman Neil Chatterjee, Federal Energy Regulatory Commission  
Commissioner Richard Glick, Federal Energy Regulatory Commission  
Commissioner Cheryl A. LaFleur, Federal Energy Regulatory Commission  
Commissioner Bernard L. McNamee, Federal Energy Regulatory Commission



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July 23, 2019

Ms. Anna Cochrane, Director, Office of Energy Market Regulation, Federal Energy  
Regulatory Commission

Mr. James Danly, General Counsel of the Commission, Federal Energy Regulatory  
Commission

Mr. Andrew Dodge, Director, Office of Electric Reliability, Federal Energy Regulatory  
Commission

Ms. Jignasa Gadani, Director, Office of Energy Policy and Innovation, Federal Energy  
Regulatory Commission

Mr. Michael Goldenberg, Senior Attorney, Office of General Counsel, Federal Energy  
Regulatory Commission

Mr. Jonathan Booe, Vice President and CAO, North American Energy Standards Board

Mr. William P. Boswell, General Counsel, North American Energy Standards Board

Mr. Michael Desselle, Chairman and Chief Executive Officer, North American Energy  
Standards Board

Mr. James B. Robb, President and Chief Executive Officer, North American Electric  
Reliability Corporation

Mr. Mark Lauby, Senior Vice President and Chief Reliability Officer, North American  
Electric Reliability Corporation

Mr. Charles A. Berardesco, Senior Vice President, General Counsel, and Corporate  
Secretary, North American Electric Reliability Corporation

**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

**Standards for Business Practices )  
And Communication Protocols for Public Utilities )**

**Docket No. RM05-5-027**

**REPORT OF THE NORTH AMERICAN ENERGY STANDARDS BOARD**

The North American Energy Standards Board (NAESB) is voluntarily submitting this report in accordance with the FERC Notice of Proposed Rulemaking (NOPR) *Standards for Business Practices and Communication Protocols for Public Utilities* issued on May 16, 2019 in Docket No. RM05-5-027.<sup>1</sup> This report supplements the NAESB report submitted to the Commission on June 5, 2019 in the above referenced docket<sup>2</sup> and is filed to update the Commission on the June 3, 2019 WEQ Executive Committee adoption of the minor correction MC19011, included in this report.<sup>3</sup>

On May 23, 2019, NAESB received a request from the North American Electric Reliability Corporation (NERC) for minor correction MC19011, which proposed to remove references to retired NERC Reliability Standards in the NAESB WEQ-003 (Open Access Same-Time Information Systems (OASIS) Data Dictionary). NERC, in conjunction with the Texas Reliability Entity (Texas RE), approved the proposed retirement of NERC Reliability Standard IRO-006-TRE-1 – IROL and SOL Mitigation in the ERCOT Region on November 7, 2018 and subsequently filed a joint petition for approval of the retirement with the Commission on December 14, 2018 in Docket No. RD19-2-000.<sup>4</sup> The Commission approved the retirement via a letter order issued on January 29, 2019.<sup>5</sup>

In accordance with the NAESB procedures for the minor correction process, the NAESB office distributed the minor correction for WEQ Executive Committee consideration and vote on May 24, 2019 through a notational ballot. At the close of the notational ballot period on June 3, 2019, the minor correction was adopted by the Executive Committee by achieving the requisite simple majority support with 33 votes in favor and no votes in opposition. The minor correction was posted for a two-week comment period following Executive Committee approval beginning on June 4, 2019 and ending on June 17, 2019. No comments were received and the minor correction was made effective on July 3, 2019.

This report is organized into four appendices. Appendix 1 references the specific minor correction and is followed by Appendix 2 which contains the NAESB Wholesale Electric Quadrant (WEQ) Executive Committee

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<sup>1</sup> Notice of Proposed Rulemaking, *Standards for Business Practices and Communication Protocols for Public Utilities*, 84 Fed. Reg. 24050 (May 16, 2019), 167 FERC ¶ 61,127 (2019).

<sup>2</sup> The June 5, 2019 NAESB Report to FERC, *Federal Energy Regulatory Commission Standards for Business Practices and Communication Protocols for Public Utilities Notice of Proposed Rulemaking*, was filed in Docket No. RM05-5-027 and may be accessed at the following link: [https://www.naesb.org/pdf4/naesb060519\\_comments\\_ferc\\_nopr051619\\_weqv003.2.pdf](https://www.naesb.org/pdf4/naesb060519_comments_ferc_nopr051619_weqv003.2.pdf).

<sup>3</sup> Minor Correction MC19011 is posted to the NAESB website and available at the following link: [https://naesb.org/member\\_login\\_check.asp?doc=weq\\_mc19011.pdf](https://naesb.org/member_login_check.asp?doc=weq_mc19011.pdf).

<sup>4</sup> The December 14, 2018 NERC and TRE Report to FERC, *Joint Petition of the North American Electric Reliability Corporation and Texas Reliability Entity, Inc. for Approval of Retirement of Regional Reliability Standard IRO-006-TRE-1*, can be accessed at the following link: <https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/IRO-006-TRE-1%20Retirement%20Petition.pdf>.

<sup>5</sup> Letter Order, *Petition of the North American Electric Reliability Corporation for Approval to Retire Regional Reliability Standard IRO-006-TRE-1*, FERC Docket No. RD19-2-000 (January 29, 2019).

action approving MC19011. Appendix 3 is comprised of the notice to WEQ membership of the WEQ Executive Committee adoption of MC19011. Finally, Appendix 4 references the Procedures for Minor Corrections as excerpted from the NAESB Operating Procedures.

The list of appendices shown below in tabular form include the FERC docket number for the amended standard, the version of standard amended, and a description of the amendments:

<b>Appendix No.</b>	<b>Minor Correction Description</b>
Appendix 1	<p><b>MC19011</b> applies to Docket No. RM-05-5-027 and WEQ-003 Open Access Same-Time Information Systems (OASIS) Data Dictionary within Version 003.2 of the NAESB WEQ Business Practice Standards in which the Federal Energy Regulatory Commission issued a Notice of Proposed Rulemaking on May 16, 2019.</p> <p><u>Errata to Version 003.2 NAESB WEQ Business Practice Standards:</u></p> <p>NAESB WEQ-003-0 Business Practice Standard (Open Access Same-Time Information Systems (OASIS) Data Dictionary): The purpose of the minor correction is to modify WEQ-003-0 to remove references from two data elements and their definitions. Both data elements, PROCEDURE_NAME and PROCEDURE_LEVEL, contain references to the retired NERC Reliability Standards IRO-006-TRE-1 – IROL and SOL Mitigation in the ERCOT Region, approved by the Commission for retirement on January 29, 2019.</p>
Appendix 2	NAESB WEQ Executive Committee notational ballot results approving the NAESB WEQ minor correction.
Appendix 3	Notice to WEQ members of Executive Committee adoption of the MC19011.
Appendix 4	NAESB operating procedures for minor clarifications and corrections to standards.

We appreciate the opportunity to provide this minor correction to the Commission. This minor correction, MC19011, impacts Version 003.2 of the NAESB WEQ standards currently the subject of the May 16, 2019 FERC NOPR in Docket No. RM05-5-027. If there are any questions or additional information is required, do not hesitate to contact the NAESB office (713-356-0060, naesb@naesb.org).

Appendix 1 contains **Minor Correction MC19011**, minor correction to Version 003.2 of the NAESB WEQ-003 Business Practice Standards: Open Access Same-Time Information Systems (OASIS) Data Dictionary.

**MC19011**  
**North American Energy Standards Board**  
**As approved by the WEQ Executive Committee on June 3, 2019**  
**Request for Minor Correction/Clarification of a NAESB Business Practice Standard,**  
**Model Business Practice or Electronic Transaction**

Date of Request: May 23, 2019

1. Submitting Entity & Address:

The North American Electric Reliability Corporation  
3353 Peachtree Rd NE Suite 600, North Tower  
Atlanta, GA 30326

2. Contact Person, Phone #, Fax #, Electronic Mailing Address:

Name: Howard Gugel  
Title: Vice President and Director of Engineering and Standards  
Phone: 404-446-9693  
Fax: n/a  
E-mail: [Howard.gugel@nerc.net](mailto:Howard.gugel@nerc.net)

3. Version and Standard Number(s) suggested for correction or clarification:

NAESB WEQ Business Practice Standards Version 003.2, WEQ-003-0

## MC19011

**North American Energy Standards Board  
 As approved by the WEQ Executive Committee on June 3, 2019  
 Request for Minor Correction/Clarification of a NAESB Business Practice Standard,  
 Model Business Practice or Electronic Transaction**

4. Description of Minor Correction/Clarification including redlined standards corrections:

**WEQ-003-0 Definition of Data Element**

OASIS Data Dictionary Element Name	Alias	Field Format: minimum characters {type of ASCII} maximum characters	Restricted Values	Definition of Data Element
PROCEDURE_NAME	PROCNAME	0{ALPHANUMERIC}25	Valid Values: NERC TLR WECC USF <del>NERC TRE</del> {Registered}	Name of a transmission security procedure: - NERC TLR as defined in NERC Standard IRO-006- EAST-2  - WECC USF as defined in WECC Policy IRO-006- WECC-2  <del>- NERC TRE as defined in NERC Standard IRO-006-TRE-1</del>  - Local procedure as registered by Transmission Providers
PROCEDURE_LEVEL	PROCLVL	1{ALPHANUMERIC}25	Valid Values: {NERC TLR Levels} {WECC USF Levels} <del>{NERC TRE Levels}</del> {Registered}	Levels or stages associated with actions to be taken in implementation of a transmission security procedure as defined in:  - NERC TLR Standard IRO-006-EAST-2 for the NAESB Business Practice Standards WEQ-008 TLR procedure  - WECC USF Policy IRO-006-WECC-2 for the WECC USF procedure  <del>- NERC TRE Standard IRO-006-TRE-1</del>  - Local procedures as registered by Transmission Providers

*Revised April 3, 2012*

## **MC19011**

**North American Energy Standards Board**

**As approved by the WEQ Executive Committee on June 3, 2019**

**Request for Minor Correction/Clarification of a NAESB Business Practice Standard,  
Model Business Practice or Electronic Transaction**

5. Reason for of Minor Correction/Clarification:

The Texas RE Board of Directors approved the retirement of IRO-006-TRE-1 on September 12, 2018. The NERC Board of Trustees subsequently approved the retirement on November 7, 2018. The FERC approved the retirement on January 29, 2019 in Docket No. RD19-2-000.

**Appendix 2 – NAESB WEQ Executive Committee Notational Ballot Results  
Approving NAESB Wholesale Electric Quadrant Minor Correction  
July 23, 2019**

Appendix 2 contains the notational ballot of the NAESB Wholesale Electric Quadrant Executive Committee and the action taken by the Wholesale Electric Quadrant Executive Committee to approve the following minor correction:

<b>Appendix No.</b>	<b>NAESB WEQ Executive Committee Notational Ballot</b>
Appendix 2	MC19011 as approved by the WEQ Executive Committee on June 3, 2019. Results: <a href="https://www.naesb.org/pdf4/weq_ec052419ballot_results.docx">https://www.naesb.org/pdf4/weq_ec052419ballot_results.docx</a>



**Appendix 3 – Notice to WEQ Members of Executive Committee Adoption of Minor Correction  
July 23, 2019**

Appendix 3 contains the correspondence sent to all Wholesale Electric Quadrant members notifying them of the Executive Committee action taken on the minor correction, requesting comments that opposed the minor correction, and informing them of future actions and timelines related to the minor correction.

<b>Appendix No.</b>	<b>Correspondence/Notice</b>
Appendix 3	MC19011 – Request for Comments due June 17, 2019: <a href="https://www.naesb.org/pdf4/weq_mc060419reqcom.doc">https://www.naesb.org/pdf4/weq_mc060419reqcom.doc</a> No Comments Received

Appendix 4 contains the excerpt from the NAESB Operating Procedures detailing the procedures to be followed for minor clarifications and corrections to existing NAESB WEQ Business Practice Standards.

### **Procedures for Minor Corrections as excerpted from the NAESB Operating Procedures**

#### **D. Minor Clarifications and Corrections to Standards**

Minor clarifications and corrections to existing standards include: (a) clarifications or corrections made by a regulatory agency to standards that are of a jurisdictional nature, or by the American National Standards Institute or its successor; (b) clarifications or corrections to the format, appearance, or descriptions of standards in standards documentation; (c) clarifications or corrections to add code values to tables; and (d) clarifications and corrections that do not materially change a standard. Any request for a minor clarification or correction to an existing standard should be submitted in writing to the executive director. This request shall include a description of the minor clarification or correction and the reason the clarification or correction should be implemented.

##### **1. Processing of Requests**

The executive director shall promptly notify the EC and any appropriate subcommittee(s) of the receipt of the request. The members of the applicable quadrant's EC shall promptly determine whether the request meets the definition of a minor clarification or correction. Through the decision of the vice chair of the applicable quadrant, this determination may be delegated to one of the quadrant's subcommittees, with the concurrence of the subcommittee chair, in which case the subcommittee shall make a prompt decision.

If the request is determined to meet the definition of minor clarification or correction, the applicable quadrant's EC, with input from any subcommittee(s) to which the request has been forwarded, shall act on the request within one month of its receipt. A meeting to discuss the request is not required; the decision may be made by notational vote. A simple majority of the votes received shall determine the outcome. The members of the applicable quadrant's EC shall be given at least three working days to consider and vote on the request.

##### **2. Public Notice**

The results of the vote on the request for a minor clarification or correction shall be posted on the NAESB website and the members of the applicable quadrant shall be notified of the request by e-mail. If the request has been approved by the applicable quadrant's EC, the notification shall include a brief description of the request, the contact name and number of the requester so that further information can be obtained, and the proposed effective date of the clarification or correction. Any interested party shall have an opportunity to comment on the request, and the comments shall be posted on the NAESB website. The comment period is two weeks.

##### **3. Final Disposition of Approved Requests**

If no comments are received on an approved request, the standard shall be clarified or corrected as specified in the approved request on the effective date proposed. If comments are received, they shall be forwarded to the members of the applicable quadrant's EC for consideration. Each comment requires a public written response from the applicable quadrant's EC. The applicable quadrant's EC shall determine whether changes are necessary as a result of the comments. Members of the applicable quadrant's EC shall be given three working days to consider the comments and determine the outcome, which shall be decided by a simple majority of the votes received. A meeting to discuss the request is not required; the decision may be made by notational vote. The standard shall be clarified or corrected in accordance with the outcome of the vote, effective with the completion of voting, and notice thereof shall be posted on the NAESB website. In the case of minor corrections which are discovered during the editorial

**Appendix 4 – NAESB Operating Procedure for Minor Clarifications and Corrections to Standards  
July 23, 2019**

review process of publication of a new version and are categorized as clarifications under (b) or (c) above<sup>1</sup>, the proposed effective date may be (i) two weeks from the date of public notice, following simple majority approval by the applicable Quadrant(s) EC(s) of the shortened effective date, or (ii) one month from the date of the public notice. For all others, the proposed effective date of the minor clarification or correction shall normally be one month from the date of the public notice upon simple majority approval of the applicable Quadrant(s) EC(s).

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<sup>1</sup> Minor clarifications and corrections to existing standards include: (a) clarifications or corrections made by a regulatory agency to standards that are of a jurisdictional nature, or by the American National Standards Institute or its successor; (b) clarifications or corrections to the format, appearance, or descriptions of standards in standards documentation; (c) clarifications or corrections to add code values to tables; and (d) clarifications and corrections that do not materially change a standard.