



NORTH AMERICAN ENERGY STANDARDS BOARD

801 Travis, Suite 1675 • Houston, Texas 77002 • Phone: (713) 356-0060 • Fax: (713) 356-0067
email: naesb@naesb.org • Web Site Address: www.naesb.org

May 16, 2011
via mail and electronic mail

Dr. Andrei Kirilenko
Chief Economist, Office of the Chief Economist
U.S. Commodity Futures Trading Commission
1155 21st Street, NW
Washington DC 20581

RE: Notice requesting nominations for the Subcommittee on Data Standardization under the Technology Advisory Committee

Dear Dr. Kirilenko,

Please find attached the nomination of the North American Energy Standards Board (“NAESB”) member Wayne Moore to the Subcommittee on Data Standardization under the Technology Advisory Committee. Should Mr. Moore be accepted, he will be representing NAESB. We are grateful for the opportunity to be considered for participation in the Data Standardization Subcommittee and are available to answer any questions or provide any additional information necessary to support the Commodity Futures Trading Commission efforts as subcommittee members are selected.

With Best Regards,

Jonathan Booe

Jonathan Booe, Deputy Director, NAESB

cc: Chairman Gary Genslar, U.S. Commodity Futures Trading Commission
Commissioner Michael Dunn, U.S. Commodity Futures Trading Commission
Commissioner Jill E. Sommers, U.S. Commodity Futures Trading Commission
Commissioner Bart Chilton, U.S. Commodity Futures Trading Commission
Commissioner Scott D. O’Malia, U.S. Commodity Futures Trading Commission

Mr. Michael Bardee, General Counsel of the Commission, Federal Energy Regulatory Commission
Mr. Mason Emmett, Director, Office of Energy Policy and Innovation, Federal Energy Regulatory Commission

Ms. Rae McQuade, President, NAESB
Ms. Valerie Crockett, Chairman of the NAESB Board of Directors
Mr. William P. Boswell, NAESB General Counsel
Mr. Michael D. Desselle, Wholesale Electric Quadrant Vice Chairman of the NAESB Board of Directors
Mr. Ralph Cleveland, Retail Gas Quadrant Vice Chairman of the NAESB Board of Directors
Mr. J. Cade Burks, Retail Electric Quadrant Vice Chairman of the NAESB Board of Directors

The North American Energy Standards Board (NAESB) is an American National Standards Institute (ANSI) accredited, non-profit 501(c)(6) corporation formed with the support of the U. S. Department of Energy (DoE) for the purpose of developing voluntary standards and model business practices designed to promote more competitive and efficient natural gas and electric services that streamline the transactional processes of the natural gas and electric industries. NAESB and its predecessor organization, the Gas Industry Standards Board (GISB), have developed voluntary consensus based standards in these industries for nearly twenty years with the support of the Federal Energy Regulatory Commission (FERC), the DoE, the North American Electric Reliability Corporation (NERC), the National Association of Regulatory Utility Commissioners (NARUC) and state utility commissions among other governmental and industry agencies¹. For those energy standards that are federally jurisdictional, virtually all have been adopted into the code of federal regulations by the FERC². Many of the retail standards have also been adopted by state commissions or have been used as inputs in support of state regulatory actions.

NAESB maintains a membership of over three hundred corporate members representing all segments of the wholesale gas, wholesale electric, retail gas and retail electric markets, and has more than 2000 industry volunteers active in standards development. NAESB has developed over 600 wholesale natural gas standards covering business transactions ranging from contracting for the purchase and sale of natural gas to nomination and scheduling of gas transportation, gas measurement, and accounting. It has also developed more than 700 standards to support the Open Access Same-Time Information System (OASIS) of the electric grid and another 300 to support other wholesale electric market functions, including complementary market-based standards to support electric reliability standards developed by the NERC. For the retail markets, more than 500 standards that have been developed to support state policies. Most recently, NAESB worked with FERC staff to develop e-Tariff standards, to facilitate electronic filings of natural gas pipelines, electric utilities and oil pipeline tariffs. NAESB's expertise and success in the development of industry reporting standards in support of market transparency, that have been adopted in both retail and wholesale energy markets, could serve as an invaluable asset to the Data Standardization Subcommittee as it prepares reports, findings, and/or recommendations to the Technology Advisory Committee.

As the U.S. Commodity Futures Trading Commission ("CFTC") through the Technical Advisory Committee develops rules in support of the Dodd-Frank Act, it is advisable that the energy industry have a voice and representative on the Data Standardization Subcommittee to provide input on issues related to the energy markets. While it is clear that the energy industry is not the main focus of a number of the rules and issues under consideration, the energy industry will be impacted, so we would encourage the selection of a subcommittee member from the energy industry with a background that includes standards, regulatory frameworks, finances and financial reporting. NAESB has experience with the development of business practices, reporting standards and

¹ NAESB Comments in response to the National Institute of Standards and Technology request for information on Effectiveness of Federal Agency Participation in Standardization in Select Technology Sectors for National Science and Technology Council's Sub-Committee on Standardization, [Docket Number 0909100442-0563-02] (http://www.naesb.org/pdf4/naesb_comments_nist_effectiveness_020711.doc)

² William P. Boswell & James P. Cargas, *North American Energy Standards Board: Legal and Administrative Underpinnings of a Consensus Based Organization*, 27 Energy L. J. 47 (2006).



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Attachment A
May 16, 2011

Nomination of the North American Energy Standards Board

data and data format standardization, in support of both natural gas and electricity markets. In addition, NAESB and its members addressed requirements for reporting where common codes are needed – such as for unique entity identification, product identification, transaction identifications for the operations in both wholesale and retail energy markets, and most recently in support of smart grid applications. The NAESB base contract for natural gas is widely used and has brought a level of ease to contracting such that the majority of the natural gas moving under contracts of one year or less is based upon it.

Because of the discussion noted above, we are pleased to nominate Wayne Moore, a NAESB Board member, to the Subcommittee on Data Standardization. Mr. Moore's biography is provided in Attachment B, following. For contact information regarding this request and nomination, do not hesitate to reach NAESB through Jonathan Booe, jbooe@naesb.org, 713-356-0060. We look forward to your response and to supporting your effort in whichever manner you deem appropriate.



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Attachment B
May 16, 2011

Nomination of D. Wayne Moore to Represent NAESB on the Subcommittee on Data Standardization

Biography: Wayne Moore is currently the Operations Compliance Officer and Vice President, Southern Company Services. As Operations Compliance Officer, Mr. Moore is responsible for oversight of the Operations compliance program (with Operations including both generation and transmission business functions). In addition, Mr. Moore is also responsible for Southern Companies' business assurance programs, generation energy policy and providing oversight to the Southern Companies' Intercompany Interchange Contract (i.e., pooling agreement). Prior to this assignment, Mr. Moore was Director, Regulatory Affairs and Energy Policy for Southern Company Generation, responsible for developing and implementing generation energy policy and oversight of the system pooling agreement. Mr. Moore has over thirty six years of experience with the Southern electric system in the areas of system control, system security, intercompany contracts, economic analysis, wholesale power markets, risk control, risk management, regulatory affairs (both state and federal), and energy policy. Specific work experience includes system modeling, unit performance monitoring and testing, economic dispatch, automatic generation control, load flow analysis, incremental transmission losses modeling, system operation performance monitoring, pooling arrangements, unit commitment and operational modeling, wholesale transactions evaluations, interchange analysis, wholesale power negotiations, wholesale power accounting and billing, supply-side bidding program development and implementation, competitive assessment activities, legislative/regulatory support, regulatory reporting, and bulk power strategic planning activities.

Employer: Southern Company Services, Inc.

Current Position: Vice President, Operations Compliance Officer, Southern Company - Generation, 2011 to Present

- Oversees Operations compliance programs. The scope of such programs covers both the generation and transmission business functions
- Oversees Southern Companies' business assurance programs
- Oversees interfaces with federal and state regulatory agencies
- Oversees and directs the establishment and implementation of energy policy for Southern Company Generation
- Oversees and directs the implementation and administration of the Southern Company Intercompany Interchange Contract
- Supports Southern Companies with respect to proceedings before the Federal Energy Regulatory Commission
- Oversees Southern Company Generation's involvement in industry activities

Education: Bachelor of Science, Electrical Engineering, University of Alabama in Birmingham, 1978



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Attachment B
May 16, 2011

Testimony: Prepared Direct and Rebuttal Testimony in *Southern Company Services, Inc. et al.*, FERC Docket No. EL04-124 (2006)

Prepared Rebuttal Testimony in *Southern Power Company*, FERC Docket No. ER03-713, *et seq.* (2005)

Expert Report and Hearing Testimony in *United States of America v. Alabama Power Company*, United States District Court (N.D. Alabama), Case No. CV 01-HS-0152-S