**FORMAL COMMENTS**

**Quadrant:** Wholesale Electric Quadrant

**Recommendation:** **Number:** 2011 WEQ Annual Plan Item 5(a) / R08001 / R08002 / R08003 / R08005

**Title:** Make consistency changes to Version 2.2

**Submitted By:** IESO, ISO New England, MISO, PJM, and SPP

**Date:** September 8, 2011

The parties listed above are submitted these formal comments for the Executive Committee to consider before taking action to approve the “Make consistency changes to Version 2.2.

**General Comments**

* It is unclear why the list of entities in the Applicability section are different between WEQ-001, WEQ-002, WEQ-003 and WEQ-013. WEQ-001 are the business practices for OASIS, WEQ-002 contain the templates, and WEQ-013 are the implementation rules for using the templates. It is not apparent why entities implementing OASIS requirements would be different from the entities using the templates.
  + The WEQ 001 Applicability section includes ISO, Load Serving Entity (LSE), and RTO which are not included in other OASIS Standards.
  + The WEQ-002 Applicability section includes TSIP which is not included in other OASIS standards (EBS)
  + Currently the Applicability section for WEQ-003 states”Applies to all standards that use Data Elements as defined in the OASIS data dictionary.” It does not contain the list of entities referenced. (EBS)
  + The WEQ-013 Applicability section includes “Assignee, Seller, OASIS and OASIS Node which are not included in other OASIS Business Practice Standards.
* The Recommendation needs to consider that the Service Across Multiple Transmission Systems (SAMTS) Recommendation has been ratified. Additional consistency changes are needed, which are documented under WEQ-013 comments.

**WEQ-001**

* Introduction
  + In the Glossary Final Action there was a determination that Primary Provider would not be used. Instead Transmission Provider should be used. References to Primary Provider should be change to Transmission Provider.
  + In the Glossary Final Action there was a determination that tariff would not be a defined term. Tariff needs to be lower case or it needs to be defined in WEQ-000.

**WEQ-002**

* Introduction
  + Same comments for WEQ-001 apply.
  + The entire text for this section should appear as redlines since the text is new.

**WEQ-003**

* Introduction
  + Same comments for WEQ-002 apply.
* Applicability
  + The Applicability section should be the list of entities for which the Business Practice Standards apply. It should be the same list of entities documented in WEQ-002.

**WEQ-013**

* Applicability
  + Same comments for WEQ-001 apply.
* WEQ-013-2.6.9 will need to have the reference updated to the appropriate example number. This is from the SAMTS Final Action.
* WEQ-013-4.1.9 will need to be marked as Reserved, and the example should be moved to WEQ-013.x. This is from the SAMTS Final Action.
* WEQ-013.x
  + Recommend deleting the language “Examples 1 through 9”. There is no need for the language. If it is kept in the Business Practice Standard, it will need to be updated everytime a new example is added. Over time, it will most likely get out of sync with the number of examples included in the section.
* WEQ-013-x (Example 5)
  + In example 5a ROLLOVER\_WAIVED should not be underlined.
  + In Example 5d ROLLOVER\_WAIVED and Transmission Provider should not be underlined.
* WEQ-013-x (Example 6)
  + The second occurrence of Example 6d “Negotiations Superseded by Higher Priority Reservation” should be Example 6f.
  + Examples 6a through 6f need to be updated to include changes from SAMTS Final Action.