

Minor Correction Request

Quadrant: Wholesale Electric Quadrant (WEQ)
Business Practice: Remove Content of WEQ001-1.5 through WEQ001-1.8
Submitted By: Ed Skiba
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Midwest ISO is requesting that the WEQ Executive Committee delete the content of WEQ001-1.5 through WEQ001-1.8 as a minor correction. We believe deleting these sections meets the criteria of a minor correction based upon FERC actions and prior actions taken by the WEQ Executive Committee.

According to the NASB Operating Practices Minor Corrections 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.

Background FERC Actions:

On May 9, 2005, the Commission issued its Notice of Proposed Rulemaking (NOPR) R05-005-000 Standards for Business Practices and Commission Protocols for Public Utilities. Paragraph 25 states:

With the exception of standards, discussed below, involving standards that duplicate the requirements in our regulations (OASIS Business Practice Standard 1, including Standards 1.1 through 1.8, and in the Definitions of "Affiliate," "Responsible party," "Reseller," "Transmission Provider," "Transmission Customer," and "Wholesale merchant function"), we believe that the WEQ's OASIS Business Practice Standards are consistent with the Commission's existing standards on this topic.¹

On April 26, 2005, the Commission issued Order Number 676 incorporating by reference the WEQ NAESB Business Practices Version 0. This Final Rule did not incorporate WEQ001-1.5 through WEQ001-18 as documented in paragraph 19:

The specific standards developed by the WEQ that we are incorporating by reference in this Final Rule are as follows:

Business Practices for Open Access Same-Time Information Systems (OASIS) (WEQ-001, Version 000, January 15, 2005, with minor corrections applied on March 25, 2005, and additional numbering added October 3, 2005) including Standards 001-0.2 through 001-0.8, 001-2.0 through 001-9.6.2, 001-9.8 through 001-10.8.6, and Examples 001-8.3-A, 001-9.2-A, 001-10.2-A, 001-9.3-

¹ In addition, although we are proposing to incorporate by reference OASIS Business Practice Standard 10.6, we have problems with this provision that we are asking commenters to address in their comments on this NOPR.

A, 001-10.3-A, 001-9.4.1-A, 001-10.4.1-A, 001-9.4.2-A, 001-10.4.2-A, 001-9.5-A, 001-10.5-A, 001-9.5.1-A, and 001-10.5.1-A;

On July 21, 2008, the Commission issued Order Number 676-C incorporating by reference the WEQ NAESB Business Practices Version 1. This Final Rule also did not incorporate WEQ001-1.5 through WEQ001-18 as documented in paragraph 9:

The specific NAESB standards that we are incorporating by reference in this Final Rule are:

Business Practices for Open Access Same-Time Information Systems (OASIS), Version 1.4 (WEQ-001, Version 001, Oct. 31, 2007, with minor corrections applied on Nov. 16, 2007) including Standards 001-0.2 through 001-0.8, 001-0.14 through 001-0.20, 001-2.0 through 001-9.6.2, 001-9.8 through 001-12.5.2, and 001-A and 001-B;²

Background WEQ Executive Committee Actions:

On October 15, 2007, the WEQ Executive Committee met via conference call and determine the change to remove all of WEQ009 could be done under a minor correction citing Order 676 where the Commission determined they would not include WEQ009 in the Final Rule “because they duplicate the Commission’s regulation on this subject” as noted in paragraph 72. The “Minor Correction to NAESB WEQ-009 Standards of Conduct” dated October 17, 2007, provides additional detail on the WEQ Executive Committee’s action http://www.naesb.org/pdf3/weq_mc101707weq009.doc.

Summary:

Based on the references cited above, removing the content of WEQ 001-1.5 through WEQ 001-1.8 meets the criteria for a minor correction based on precedence established by the WEQ Executive Committee in 2007. With this minor correction we are requesting that the WEQ Executive Committee take a similar action on the WEQ 001-1.5 through WEQ 001-1.8 requirements as it did with the WEQ 009 requirements which were not incorporated in either FERC Orders 676 or 676-C.

² The WEQ Version 001 package of standards includes Version 1.4 of the OASIS Standards. The reference to Version 1.4 is based on the fact that this is the fourth set of revisions to the Version 1.0 OASIS Standards that the Commission adopted in Order No. 889. Open Access Same-Time Information System and Standards of Conduct, 61 FR 21,737 (May 10, 1996), FERC Stats. & Regs. ¶ 31,035 (April 24, 1996). The Version 1.4 reference appears in Standards WEQ-001, WEQ-002, WEQ-003, and WEQ-013.