**Minor Correction Comments**

**Quadrant:** Wholesale Electric Quadrant (WEQ)

**Subcommittee:** Executive Committee

**Recommendation:** Minor Correction Comments MC17005/2017 WEQ Annual Plan Item 1.e.ii

**Submitted By:** ISO RTO Council’s Standards Review Committee[[1]](#footnote-1)

**Date:** May 2, 2017

The following ISO/RTOs are submitting the following comments for consideration by the Executive Committee regarding the Minor Correction [MC17005](https://www.naesb.org/member_login_check.asp?doc=weq_mc17005.doc) and the [No Action Recommendation for 2017 WEQ Annual Plan Item 1.e.ii](https://www.naesb.org/pdf4/weq_2017_api_1eii_rec.docx): CAISO, IESO, ISONE, MISO, NYISO, and PJM.

A Standards Request [R16010](https://www.naesb.org/member_login_check.asp?doc=r16010.doc) was submitted to modify the e-Tagging Functional Specification along with a number of other changes to the WEQ Business Practice Standards. In the No Action recommendation the CISS noted that there were no changes needed to the e-Tagging Functional Specification as the changes were being addressed through a minor correction. In our deliberation of these comments, there is concern about the process used to make these corrections to the standards.

The NAESB Operating Procedures outline four scenarios for altering a standard via the minor correction process.

1. 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;
2. clarifications or corrections to the format, appearance, or descriptions of standards in standards documentation;
3. clarifications or corrections to add code values to tables; and
4. clarifications and corrections that do not materially change a standard.

We do not believe the criteria were met to classify the changes to the e-Tagging Functional Specification as a minor correction. As a result of submitting the Minor Correction and No Action Recommendation to the Executive Committee for action, we acknowledge that it would be difficult to unwind what has been done. For example, possible cumbersome options may be for Executive Committee to vote against the Minor Correction and remand the No Action Recommendation back to the CISS. We do not see value in pursing these options, which will achieve the same result as the Minor Correction and No Action Recommendation. Thus, we will support the changes listed in the Minor Correction, but want to go on record that we do not believe the appropriate process was followed to change the e-Tagging Functional Specification.

1. SPP and ERCOT have not signed on to these comments. [↑](#footnote-ref-1)