



NORTH AMERICAN ENERGY STANDARDS BOARD

1415 Louisiana, Suite 3460 • Houston, Texas 77002 • Phone: (713) 356-0060 • Fax: (713) 356-0067
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July 5, 2024
Filed Electronically

The Honorable Debbie-Anne A. Reese
Federal Energy Regulatory Commission
888 First Street, N.E. Room 1A
Washington, DC 20426

RE: Standards for Business Practices and Communication Protocols for Public Utilities (Docket No. RM05-5-031)

Dear Ms. Reese:

The North American Energy Standards Board (“NAESB”) herewith voluntarily submits this report to the Federal Energy Regulatory Commission (“FERC” or “Commission”) regarding errata to Version 004 of the NAESB Wholesale Electric Quadrant (“WEQ”) Business Practice Standards, currently the subject of a Notice of Proposed Rulemaking issued on April 25, 2024 in Docket No. RM05-5-031. The standards included in Version 004 of the NAESB WEQ Business Practice Standards were ratified by the NAESB membership between April 2020 and July 2023, and the publication was submitted to the Commission on July 31, 2023. The minor correction included in this report, Minor Correction MC24004, was submitted to the WEQ Executive Committee on July 3, 2024 and modifies NAESB WEQ Business Practice Standard WEQ-001-24.2.4.

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). Please feel free to call the NAESB office (713-356-0060) or refer to the NAESB website should you have any questions or need additional information regarding Version 004 of the NAESB WEQ Business Practice Standards.

Respectfully submitted

Ms. Rae McQuade
President, North American Energy Standards Board

cc with enclosures:

Chairman, Willie L. Phillips, Federal Energy Regulatory Commission
Commissioner, Mark C. Christie, Federal Energy Regulatory Commission
Commissioner, David Rosner, Federal Energy Regulatory Commission
Commissioner, Lindsay S. See, Federal Energy Regulatory Commission

Mr. Matthew Christiansen, General Counsel, Office of the General Counsel, Federal Energy Regulatory Commission

Mr. Joseph H. McClelland, Director, Office of Energy Infrastructure Security, Federal Energy Regulatory Commission

Ms. Jette Gebhart, Director, Office of Energy Market Regulation, Federal Energy Regulatory Commission

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

Mr. Michael Desselle, Chairman & CEO, North American Energy Standards Board

Mr. Jonathan Booe, Executive Vice President & COO, North American Energy Standards Board

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

Enclosures (all documents and links are available publicly on the NAESB website – www.naesb.org)

- Appendix A Minor Correction MC24004
- Appendix B NAESB WEQ Executive Committee Notational Ballot Due July 10, 2024
- Appendix C NAESB Operating Procedures for Minor Clarifications and Corrections to Standards



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

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

Docket No. RM05-5-031

The North American Energy Standards Board (“NAESB”) voluntarily submits this report in accordance with the Federal Energy Regulatory Commission (“FERC” or “Commission”) Notice of Proposed Rulemaking (“NOPR”) *Standards for Business Practices and Communication Protocols for Public Utilities* issued on April 25, 2024 in Docket No. RM05-5-31.¹ This report is to update the Commission on efforts underway by the NAESB Wholesale Electric Quadrant (“WEQ”) Executive Committee to consider Minor Correction MC24004, included in this report.²

On July 3, 2024, NAESB received the request for minor correction, Minor Correction MC24004, submitted by Idaho Power Company. Minor Correction MC24004 revises WEQ-001-24.2.4 included in the WEQ-001 Open Access Same-Time Information Systems (OASIS) Business Practice Standards within Version 004 of the NAESB WEQ Business Practice Standards. The NAESB WEQ-001 Business Practice Standards establish the general and specific transaction processing requirements and related business processes for postings to OASIS sites. Specifically, WEQ-001-24.2.4 supports the posting requirements included as part of 18 CFR 37.6. The request proposed to correct an inadvertent typographical error to standards changes that were adopted and ratified by NAESB in response to 2022 WEQ Annual Plan Item 3.c / Standards Request R21004. These changes included the addition of a new phrase “consistent with regulations and filed tariffs” at the end of the WEQ-001-24.2.4. In applying the ratified changes, the word “consistent” was inadvertently replaced with the word “consent.” The minor correction addresses this error and modifies WEQ-001-24.2.4 to make it consistent with the language ratified by NAESB membership on November 18, 2022, prior to the publication of WEQ Version 004. The standard change resulting from the adoption of Minor Correction MC24004 will be applied on August 9, 2024.

In accordance with the NAESB Operating Procedures for Minor Clarifications and Corrections to Standards, the NAESB office distributed Minor Correction MC24004 for NAESB WEQ Executive Committee consideration and vote via notational ballot on July 3, 2024. The notational ballot period ends on July 10, 2024. If the minor correction obtains the requisite simple majority support for adoption by the NAESB WEQ Executive Committee and no

¹ Notice of Proposed Rulemaking, *Standards for Business Practices and Communication Protocols for Public Utilities*, 89 Fed. Reg. 37147 (April 25, 2024) 18 FERC ¶ 38 (2024).

² Minor Correction MC24004 is posted to the NAESB website and available at the following hyperlink: https://www.naesb.org/member_login_check.asp?doc=weq_mc24004.doc



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comments are received during the subsequent two-week comment period, the effective date for Minor Correction MC24004 will be August 9, 2024, consistent with the NAESB Operating Procedures for minor corrections.

Additionally, in the process to submit Minor Correction MC24004, Idaho Power identified two publication errors that did not impact standards language. First, in NAESB WEQ-002 OASIS Standards and Communication Protocols Business Practice Standards, two new standards ratified by NAESB prior to the publication of NAESB WEQ Version 004, WEQ-002-101.2.10.3.3 and WEQ-002-101.2.10.3.4, were ordered incorrectly. Second, the WEQ Version 004 Notes for the changes made to WEQ-001-24.2.4 as a result of WEQ 2022 Annual Plan Item 3.c / Standards Request R21004 mistakenly omitted that “not” was deleted from the standard. As these changes do not modify standards language, a minor correction is not needed, and NAESB has taken administrative action to correct the errors.

Three appendices are included as part of this report. Appendix A contains Minor Correction MC24004. Appendix B provides a hyperlink to the NAESB WEQ Executive Committee notational ballot. Appendix C includes the NAESB Operating Procedures for Minor Clarifications and Corrections to Standards. The list of appendices shown below in tabular form include the FERC docket number of the amended standard, the version of the standard amended, and a description of the amendment:

Appendices	Description
Appendix A	Minor Correction MC24004 MC24004 applies to Docket No. RM05-5-031 and NAESB WEQ Business Practice Standard WEQ-001-24.2.4 included in the WEQ-001 OASIS Business Practice Standards within Version 004 of the NAESB WEQ Business Practice Standards. <u>Errata to Version 004 of the NAESB WEQ Business Practice Standards:</u> NAESB WEQ-001 OASIS Business Practice Standards: The purpose of the minor correction is to modify NAESB WEQ Business Practice Standard WEQ-001-24.2.4 to address a publication error and incorporate a change consistent with those approved by NAESB WEQ as part of the recommendation to support WEQ 2022 Annual Plan Item 3.c / Standards Request R21004.
Appendix B	NAESB WEQ Executive Committee Notational Ballot Due July 10, 2024
Appendix C	NAESB Operating Procedures for Minor Clarifications and Corrections to Standards

We appreciate the opportunity to provide the Commission with information regarding Minor Correction MC24002 that impacts WEQ Version 004, currently the subject of the April 25, 2024 NOPR in Docket No. RM05-



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5-031. 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 A contains Minor Correction MC24004, a minor correction to Version 004 of the NAESB WEQ-001 OASIS Business Practice Standards:

Date of Request: July 3, 2024

1. Submitting Entity & Address:

Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, Idaho 83707

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

Name: Lisa O'Hara
Title: Corporate Counsel
Phone: (208) 388-5081
Fax:
E-mail: lohara@idahopower.com

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

WEQ Version 004 –NAESB Business Practice Standard WEQ 001-24.2.4

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

In the application of the Final Action for WEQ 2022 Annual Plan Item 3.c / Standards Request R21004 a typographical error was made to NAESB Business Practice Standard WEQ 001-24.2.4. The standard should be corrected as follows in the Open Access Same-Time Information Systems (OASIS) Business Practice Standards WEQ-001 publication

001-24.2.4 The Transmission Provider impose restrictions regarding the submission times and/or service duration of a Consolidation, ~~eonsent~~consistent with regulations and filed tariffs.

5. Reason for of Minor Correction/Clarification:

The Minor Correction is submitted to correct a publication error.

Appendix B NAESB WEQ Executive Committee Notational Ballot for Minor Correction MC24004

Appendix B contains the notational ballot distributed to the NAESB WEQ Executive Committee regarding Minor Correction MC24002

Appendix **NAESB WEQ Executive Committee Notational Ballot**
Appendix B Minor Correction MC24004 Notational Ballot Due July 10, 2024:
https://www.naesb.org/pdf4/weq_ec070324ballot_MC24004.docx

Appendix C NAESB Operating Procedures for Minor Clarifications and Corrections to Standards

Appendix C 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 review process of publication of a new version and are categorized as clarifications under (b) or (c) above¹, 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).

¹ 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.