

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

Standards for Business Practices and  
Communication Protocols for Public Utilities

Docket No. RM05-5-025

**COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

**I. INTRODUCTION**

The California Independent System Operator Corporation (“CAISO”) submits the following comments in response to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) Notice of Proposed Rulemaking on Standards for Business Practices and Communication Protocols for Public Utilities issued on July 21, 2016, in the above-referenced docket.<sup>1</sup> The Commission proposes to incorporate by reference Version 003.1 of the Standards for Business Practices and Communication Protocols for Public Utilities adopted by the Wholesale Electric Quadrant (“WEQ”) of the North American Energy Standards Board (“NAESB”) into its standards.

The Commission requests comments on these standards proposed in the NOPR.

**II. COMMENTS**

The CAISO provides the following comments for the Commission’s consideration.

**A. Communications in e-Tag Authority Service Failure Procedures**

The Commission proposes certain modifications to the NAESB Standard WEQ-004 Coordinate Interchange Business Practice Standards that are designed to complement North

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<sup>1</sup> *Standards for Business Practices and Communication Protocols for Public Utilities*, 156 FERC ¶ 61,055 (2016) (“NOPR”).

American Electric Reliability Corporation (“NERC”) Reliability Standards and related developments.<sup>2</sup>

**1. NAESB Standard 004-A – Appendix A - e-Tagging Service Performance Requirements and Failure Procedures**

Appendix A of revised NAESB Standard WEQ-004, Section B.3 requires a Sink Balancing Authority (“BA”) to communicate a message *via e-mail only* to adjacent BAs during an e-Tag Authority Service failure.<sup>3</sup> The CAISO suggests that the Sink BA be permitted to broadcast its message to adjacent BAs “by email or similar alternate method”. This broader language would allow for alternate methods of communication to be used in instances where the e-Tag Authority Service is not functioning because the Internet itself is unavailable. Alternate methods of communication between BAs are already utilized by regional backup procedures, such as the Western Electricity Coordinating Council (“WECC”) Interchange Authority Backup (“WIAB”) INT-020-WECC-CRT-1.1 criterion, which is relied upon to protect the reliability of the grid when the WECC Interchange Tool (a software application that ensures that accurate e-Tag data is submitted via Requests for Interchange) is disabled.<sup>4</sup> For example, WIAB allows BAs to communicate with each other verbally during an e-Tag failure.<sup>5</sup> Allowing additional means of communication in Section B.3 would help maintain consistency with regional backup criterion and give Sink BAs the broadest ability to communicate with adjacent BAs during an e-Tag system failure.

In a related matter, the CAISO suggests that language in Section B.4 and the subsequent table under the heading “Singular Failure Actions” be amended to broaden the method of

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<sup>2</sup> NOPR at P 21.

<sup>3</sup> WEQ-004-A, Appendix A, Section B. (“e-Tag Authority Service Failure Actions”, No.3).

<sup>4</sup> Western Electricity Coordinating Council Interchange Authority Backup INT-020-WECC-CRT-1.1.

<sup>5</sup> *See, e.g., id.* at WR12, 13 and 14.

communication beyond telephone.<sup>6</sup> The CAISO recommends that such language be amended to state “communicate and confirm”, which would not only take into account other methods of communication that have been developed and are being used as a result of technological advances (e.g., electronic messaging or industry specific messaging systems like the WECC Net messaging system) but would also allow the messaging contemplated by these provisions to be accomplished by alternate routes should telephone use be unavailable.

To address these issues, the CAISO suggests that the Commission request NAESB to revise Standard WEQ-004 to allow for alternate methods of communication as described above.

### **III. CONCLUSION**

Based on the foregoing, the CAISO respectfully requests that the Commission consider these comments in this rulemaking proceeding.

Respectfully submitted,

**By: /s/ John Spomer**

Roger Collanton  
General Counsel  
Burton Gross  
Assistant General Counsel  
John Spomer  
Senior Counsel  
250 Outcropping Way  
Folsom, CA 95630  
Tel: 916-608-7257  
Fax: 916-608-7222  
[jspomer@caiso.com](mailto:jspomer@caiso.com)

Attorneys for the California Independent  
System Operator Corporation

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<sup>6</sup> WEQ-004-A, Appendix A, Section B. (“e-Tag Authority Service Failure Actions”, No.4).

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing document upon the parties listed on the official service lists in the above-referenced proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 26<sup>th</sup> day of September 2016.

*/s/ Anna Pascuzzo*

Anna Pascuzzo