

August 30, 1999

Office of the Secretary
Federal Energy Regulatory Commission
888 First Street, N. E.
Washington, DC 20426

Reference: Docket No. RM95-9-003; Open Access Same-time Information System (OASIS) and Standards of Conduct, dated February 10, 1999

Subject: OASIS Phase IA Audit Reporting Experiment

Dear Mr. Boegers:

As requested in the Commission's Order in the above referenced docket authorizing the OASIS audit reporting experiment, the How Working Group respectfully submits the following assessment of the experiment.

Based on the informal assessments documented below, concurrence of the How WG, and lack of any dissenting opinions received in response to How WG's public request for comments on the experiment (see Attachment 1), the How WG judges the audit experiment to be of significant benefit to OASIS functionality. The How WG further recommends that the concepts presented in the experiment be incorporated into the OASIS Standards and Communication Protocol (OASIS S&CP) requirements.

Due to a number of related actions taken by the Commission that have a direct effect on the OASIS S&CP, the How WG proposes to submit a comprehensive revision to the S&CP by December 31, 1999, addressing:

- Posting of curtailment and interruption information (Docket No. RM98-3 000; Order No. 605 dated May 27, 1999),
- OASIS performance requirements (Docket No. RM98-3-000; Order No. 605),
- Posting of Capacity Benefit Margin (Docket No. EL99-46-000; dated July 28, 1999),
- Miscellaneous clarifications to the standards and templates, and
- Audit reporting based on the audit experiment accounting for new information posting requirements.

A proposed timeline for the implementation of the above changes will be filed along with the revised S&CP. Until such time as the Commission approves a revised S&CP incorporating the audit reporting facilities provided in the experiment, the How WG requests that the waiver of compliance with the original OASIS Phase IA *auditlog* template be extended to the implementation date of the revised standards.

Background:

The How WG filed for authorization to implement, on an experimental basis, an enhanced OASIS audit reporting facility on October 14, 1998. The changes proposed to OASIS audit reporting in the experiment were specifically intended to provide an effective means to recover audit information with a minimum amount of “reconstruction” required on the part of the user to discern the time sequence of specific events. Nine audit related templates were defined in the experiment, and were implemented by the majority of OASIS nodes coincident with the implementation of OASIS Phase IA.

Assessment:

The How WG invited comments from all Industry segments through a public “request for comments” shown in Attachment 1. This notice was posted on the NERC TSIN web site, and also mailed electronically to all subscribers on the TSIN mailing list (tsin@tops.pacificorp.com) on June 16, 1999. At the close of the comment period on August 9, 1999, no comments were received regarding the proposed incorporation of the audit experiment into the OASIS S&CP requirements. This may reflect a general agreement with the proposal, or a lack of significant interest regarding OASIS audit functions on the part of the Industry at large.

As an informal assessment, AEP has used the new audit capability on several occasions where their was a questioned raised on the pricing of services (*transoffering* template). The audit template query very concisely showed the time sequence of changes in the pricing of services prior to and after the submission of the Customer’s reservation request. Use of the Phase IA compliant *auditlog* template would have taken a significant amount of effort to find the pricing changes for that particular path among the sea of potentially 65,000+ ATC/TTC posting updates made to AEP’s 104 posted paths during the afternoon in question.

Conclusion:

The How WG has concluded that the audit reporting facilities provided in the experiment are a significant enhancement over the Phase IA compliant *auditlog* template. We further agree that the S&CP should be revised to incorporate the experiment’s audit reporting as an OASIS requirement, and drop support for the *auditlog* template.

Since other significant Orders have recently been issued by the Commission that also impact the S&CP requirements, we propose to make a single comprehensive revision to the S&CP rather than filing a revision addressing the audit requirements alone. It is expected that this revised S&CP would be filed no later than October 31, 1999, and would include a proposed implementation schedule.

Sincerely,

Peter Hirsch

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Facilitator, OASIS How Working Group
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Attachment

OASIS How Working Group

June 10, 1999

References: February 10, 1999, Order on Transition from OASIS Phase I to OASIS Phase IA and Authorizing Proposed Phase IA Audit Reporting Experiment, Docket No. RM95-9-003 Open Access Same-time Information System (OASIS) and Standards of Conduct

Subject: Proposed Changes to OASIS Standards and Communications Protocol

Pursuant to the Commission's referenced Order, the How Working Group is requesting comments from the Industry "...assessing the new auditing procedures, comparing the procedures before and after the implementation of the audit experiment, and advising the Commission on what, if any, revisions to the OASIS S&CP or the Commission's regulations are needed to accomplish any proposed changes in procedures." This notice is to advise the Industry of the How Working Group's intent to file with the Commission a report on the Audit Experiment and to recommend revisions to the OASIS Standards and Communications Protocol Document (S&CP) to incorporate the provisions for audit reporting as filed in the Experiment.

All interested parties are asked to provide comments on these issues to the How Working Group no later than August 9, 1999 for review and consideration in drafting their report. The final report is expected to be filed with the Commission by September 1, 1999.

Background

On October 14, 1998, the How Working Group filed a letter with the Commission seeking approval to conduct an experiment aimed at improving the audit reporting procedures on OASIS coincident with the in-service date of Phase IA. The Working Group has acknowledged the limitations in the functionality of the *auditlog* template as defined in both the OASIS Phase 1 and Phase 1A Standards and Communications Protocols (S&CP) document, but lacked sufficient time to review and garner a consensus as to the best approach to improve the situation in its OASIS Phase 1A S&CP filing. The audit experiment was proposed and subsequently approved by the Commission as a voluntary mechanism for OASIS implementations to improve on the audit reporting capabilities.

The specific technical requirements for the experiment were filed by the How Working Group, and the following OASIS nodes indicated their intent to participate in the experiment:

American Electric Power (AEP) OASIS
Arizona Public Service OASIS (AZPSOASIS)
East Central Area Reliability Council (ECAR) OASIS
ENX OASIS Service
Florida OASIS (FLOASIS)
ISO New England OASIS
Mid-America Interconnected Network (MAIN) OASIS
Mid-Continent Area Power Pool (MAPP) OASIS
Northwest OASIS
PacifiCorp OASIS
PJM OASIS
OmniPath OASIS
Rocky Mountain Area OASIS
Southern Company OASIS
Southwest OASIS (SWOASIS)
Southwest Power Pool (SPP) OASIS
VACAR OASIS
Western OASIS

In their ruling approving the experiment the Commission also directed the How Working Group to file a report by September 1, 1999, assessing the new auditing procedures, comparing the procedures before and after the implementation of the audit experiment, and advising the Commission on what, if any, revisions to the OASIS S&CP or the Commission's regulations are needed to accomplish any proposed changes in procedures.

Discussion

A. Adequacy of Audit Experiment Templates

The changes proposed to OASIS audit reporting in the experiment were specifically intended to provide an effective means to recover audit information with a minimum amount of "reconstruction" required on the part of the user to discern the time sequence of specific events. Nine audit templates specific for the type of information to be audited were defined as extensions of existing Phase 1A "query/response" templates, and allowed users the full range of selective query capability as defined by the query variables associated with the standard Phase 1A templates to refine the specific information to be audited.

OASIS audit data requests made by regulatory agencies and market participants often center on three major types of discovery:

What were the ATC postings for a given path/interface as a function of time
What was the time sequence of actions taken on specific reservation requests
What was the ATC posted at the time specific reservation requests were queued.

The audit experiment templates directly address the first two types of requests (*transofferingaudit* and *transstatusaudit*), while the third request can be derived by cross referencing results from audit reports generated for the first two cases. To this extent, the audit experiment templates appear to be

vastly superior to the *auditlog* template as defined in the Phase 1A S&CP.

The How WG requests comments from the Industry on the following issues. What other types of OASIS audit reports have been commonly requested? Do the templates defined in the experiment provide OASIS user's with the necessary information to answer these types of data requests? Are there audit data requests that cannot be addressed by the experiment's templates? Do the audit experiment templates significantly improve OASIS audit reporting capabilities so as to warrant their inclusion as mandatory templates in the S&CP? Are there alternative proposals to the audit experiment templates that would make a significant improvement to OASIS audit reporting capabilities?

B. Impact on OASIS

The audit experiment templates represent a significant change over the *auditlog* template as defined in the S&CP. OASIS software vendors, node operators, and both experiment participants and non-participants are asked to comment on the following issues.

Do the implementation costs to comply with the audit experiment templates and requirements outweigh any real or perceived benefits from their implementation? Do the experiment templates significantly impact OASIS node performance? Is the volume of audit data maintained on-line significantly increased when implementing the experiment templates? If incorporated into the OASIS standards, do the experiment's templates and requirements present a significant hardship on any particular OASIS implementation? For non-participants, what is the estimated time to implement the experiment templates and requirements should they be incorporated into the S&CP?

Recommendation to Change the S&CP

The How Working Group intends to recommend to the Commission a change in the S&CP to replace the current *auditlog* template and requirements with the audit templates and requirements proposed in the audit experiment without modification. Commenters are asked to identify any provisions of the experiment's templates or reporting requirements that should be modified, included or deleted from such a recommendation.