

September 9, 2004

To: NAESB WEQ Seams Subcommittee

From: ISO/RTO Standards Review Committee

**Re: NAESB Request for Comments on Draft Request for Standards on
Transmission Market Definitions and Priorities**

This note is submitted on behalf of the ISO/RTO Council (IRC), in response to NAESB's WEQ Seams Subcommittee Draft Request for Standards on Transmission Market Definitions and Priorities.

The IRC supports the need for standards on Transmission Market Definitions throughout the U.S. and believes that it is appropriate that NAESB be the one to establish these standards. But while this effort is worthwhile the amount of effort and coordination across regions will be large. It will be an interesting challenge to create standard definitions to cover such diverse transmission service products, which are already bound by FERC-approved definitions. Since there are no sizeable interconnections between the Eastern Interconnection, ERCOT and the WECC, the definitions and requirements do not need to be universal. NAESB will need to be flexible and make allowance for regional and market differences without violating the rights of existing contracts holders and accommodate regional differences when identified.

The IRC is requesting a more detailed explanation of the issue or is it just a matter of getting all FERC-approved definitions to be the same?