

September 9, 2004

To: NAESB WEQ Seams Subcommittee

From: ISO/RTO Council's Standards Review Committee

Re: NAESB Request for Comments on Draft Request for Standards on Energy Market Product Definitions

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 Energy Market Product Definitions.

The IRC supports the need for standards on Energy Market Product Definitions throughout the U.S. and believes that it is appropriate that NAESB be the one to establish these standards. However, given the regional differences, we believe that more details need to be provided on the "seam" that is being addressed by this standard. The IRC notes that the products that are listed are being used in the west while at the same time these energy products are not aligned with the market definitions generally used in the Eastern Interconnection.

We suggest that a starting point might be to look into each of the varying tariff's definitions and review them for differences and similarities.