

Attachment III

Attachment III: Applicability of the NAESB Standards Incorporated Into Part 38 of the Commission's Regulations to the MTF Provider

The references in this Attachment III are to Version 4 of the NAESB WEQ standards.

- **WEQ-000 (Abbreviations, Acronyms, and Definitions of Terms):** The definitions in WEQ-000 will apply to the MTF Provider to the extent that they are used or referenced in other WEQ standards that are applicable to the MTF Provider.
- **WEQ-001-2 (Attribute Values Defining the Period of Service):** The MTF Provider will employ fixed hourly, daily, weekly, monthly and yearly service increments for MTF Reservations. Transmission service will be granted by the NYISO consistent with its tariffs and with NYISO's NAESB WEQ standard obligations and waivers.
- **WEQ-001-2.5.10 (Generator Imbalance Service definition):** The NYISO has previously obtained waivers of this standard because the NYISO OATT does not have the *pro forma* OATT Schedule 9 Generator Imbalance provisions that this standard addresses. Generator Imbalance Service is not available in the NYCA. Moreover, the MTF Provider does not control any generation and thus cannot offer the *pro forma* Generator Imbalance Service itself.¹ Thus, this standard is not applicable to the MTF Provider.
- **WEQ-001-3, et seq. (OASIS Registration Procedures):** Specifications for service on the MTF are set forth in proposed NYISO OATT Section 41.20. The specifications in OATT Section 41.20 are very similar to the service specifications in ISO-NE's Schedule 18 applicable to the Cross Sound Cable ("CSC") that were previously accepted by the Commission. The MTF Provider will therefore comply with this standard with respect to the service that it provides in a manner that is applicable to a DC single path point-to-point transmission line.
- **WEQ-001-4, et seq. (On-Line Negotiation and Confirmation Process):** This standard addresses the negotiation process for physical transmission service reservations under the *pro forma* OATT. The CSC was previously granted a waiver of this requirement by the Commission "because transmission service over the Cross Sound Cable is provided in accordance with a Commission-approved process rather than exclusively through the OASIS."² The MTF Provider similarly obtained permission from the Commission to offer transmission service at negotiated rates.³ WEQ-001-4, et seq. therefore should not apply to the MTF Provider for the same reasons that it was originally waived for, and then later found to be inapplicable to, the CSC.

¹ See *pro forma* OATT, Schedule 9, "The Transmission Provider must offer this service, to the extent it is physically feasible to do so from its resources or from resources available to it, when Transmission Service is used to deliver energy from a generator located within its Control Area." A copy of the currently effective *pro forma* OATT is available at <https://www.ferc.gov/media/pro-forma-oatt-effective-march-14-2022>.

² See *Cross-Sound Cable Co., LLC*, 126 FERC ¶ 61,297 at PP 15-16 (2009) (citing *TransEnergie U.S. Ltd.*, 91 FERC ¶ 61,230 (2000)).

³ *CHPE, LLC*, 171 FERC ¶ 61,186 at PP 19, 28-29 (2020); *CHPE, LLC*, Docket No. ER20-1214, Letter Order (February 8, 2022) (addressing results of CHPE's open solicitation process).

- **WEQ-001-5, *et seq.* (Procurement of Ancillary and Other Services):** This standard relates to requirements in the Commission’s OASIS regulations, i.e., 18 C.F.R. Part 37, governing the posting of Ancillary Services information. The MTF Provider does not provide Ancillary Services, so this requirement is inapplicable to it. The NYISO provides Ancillary Services to Import transactions consistent with its tariff rules and all other applicable regulatory obligations and requirements.
- **WEQ-001-6, *et seq.* (Pathnaming Business Practice Standards):** The NYISO previously obtained a waiver of these standards because it does not accept physical transmission reservation requests, or grant transmission service, tied to particular paths (except for certain external transactions). The MTF represents a single posted path. The NYISO anticipates that the MTF Provider will either use the Proxy Generator Bus name specified in the NYISO’s proposed revisions to Section 4.4.4 of the Services Tariff or choose a different path name that conforms to the requirements of this standard.
- **WEQ-001-7, *et seq.* (Next Hour Market Service):** This standard governs “Next Hour Market Service,” a voluntary service that is not offered under the NYISO’s financial reservation system. The NYISO has previously been granted waivers from WEQ standards related to this service. Transmission service on the MTF will be scheduled by the NYISO using its financial reservation system because the MTF is within the NYCA and must be scheduled and operated consistent with the NYISO’s market rules. The MTF Provider will only offer the services described in proposed NYISO OATT Section 41, which do not include Next Hour Market Service. Thus, in this instance, the NYISO’s waivers makes this standard inapplicable to the MTF.
- **WEQ-001-8, *et seq.* (Requirements for Dealing with Multiple, Identical Transmission Service Requests):** Under the NYISO’s financial reservation system, there are not multiple, identical transmission service requests because the NYISO does not receive separate and express requests for transmission service. The WEQ-001-8 standard is not applicable to the MTF Provider for two reasons.

First, under the rules proposed in NYISO OATT Section 41.18.7 and 41.18.8, the MTF Provider is required to award MTF Reservations that are posted on the OASIS on a first-come, first-served basis to Eligible Customers that agree to pay the posted price. The proposed method of awarding MTF Reservations does not include allowing time to confirm awards, or time to respond to a partial rejection of an offer to acquire MTF Reservations. The simplicity of the rules proposed in NYISO OATT Sections 41.18.7 and 41.18.8, and the MTF Provider’s Business Practices should prevent hoarding of MTF Reservations without assuming the obligation to pay for acquired MTF Reservations.

Second, under proposed NYISO OATT Section 41.15, the NYISO will have read-only access to all areas of the MTF Provider OASIS, including customer-specific pages and the ability to download data, reports and settlements. Under proposed NYISO OATT Section 41.16 both the NYISO and its independent market monitoring unit (“MMU”) will have authority to send data requests to the MTF Provider and to MTF Reservation Holders. The NYISO expects that it and the MMU will have adequate authority to monitor for and identify queue flooding or queue hoarding, if they occur. The rules and safeguards included in the NYISO’s proposed OATT Section 41 mitigate the concerns that WEQ-001-8, *et seq.* are designed to address.

- WEQ-001-9, et seq. (Redirects on a Firm Basis) and WEQ-001-10, et seq. (Redirects on a Non-Firm Basis):** The NYISO’s system does not use redirect requests, which relate to modifications to physical transmission reservations. In 2009 CSC was granted a waiver of WEQ Standards 001-9.1 through 10.8.7 because redirects and alternative Points of Receipt are not available on a single path merchant transmission facility.⁴ Like the CSC, the MTF is a DC transmission line that includes just one scheduling path. Due to the simplicity of its configuration, redirects are not possible on the MTF. This NAESB standard is therefore not applicable to the MTF Provider.
- WEQ-001-011, et seq. (Resales) and WEQ-001-012, et seq., (Transfers):** The NYISO has proposed extensive rules to address and document resales and transfers of MTF Reservations in proposed NYISO OATT Sections 41.8 and 41.18. The proposed rules were developed with input from CHPE, LLC, the owner and operator of the MTF, H.Q. Energy Services (U.S.) Inc. (“HQUS”), the Initial MTF Reservation Holder, which holds all 1,250 MW of MTF Reservations for a 40-year term, and Hydro Quebec, the Balancing Area Authority for Quebec which will also have MTF-related implementation responsibilities. The proposed rules: (i) allow the NYISO to continue to grant transmission service based on financial reservations and the NYISO’s economic evaluation of Bids to produce a least production cost solution to serve NYCA Load; while (ii) giving HQUS the rights it requires to sell Capacity and Energy to New York, and to meet its contractual obligations to deliver Energy to New York City. The proposed rules were unanimously approved by the NYISO’s stakeholders. Because the rules were developed as a negotiated compromise setting up a hybrid physical/financial solution that addresses the particular facts and circumstances of the MTF, the Commission should recognize it as an equivalent or superior solution to the *pro forma* NAESB rules.
- WEQ-001-13.1.3(b) and (c) (Performance Metrics Link):** The NYISO has obtained waivers of these standards that would otherwise require it to provide links to Transmission Service Request Metrics information required by 18 C.F.R. § 37.6(i) and Redispatch Costs information required by 18 C.F.R. § 37.6(j)(2). As explained in the NYISO’s discussion of Section 37.6(h) and (i) in Attachment II to the NYISO’s Response: (i) the NYISO, not the MTF Provider, is responsible for making transmission study postings regarding the MTF; and (ii) the MTF Provider cannot, and thus will not, provide any form of redispatch service. These standards therefore do not apply to the MTF Provider.
- WEQ-001-14, et seq. (Zero ATC Narrative), WEQ-001-15, et seq. (ATC Change Narrative), and WEQ-001-16, et seq. (ATC or AFC Methodology Questions):** These standards require posting of zero Available Transmission Capability (“ATC”) narratives, additional ATC change narratives, and responses to ATC or Available Flowgate Capacity (“AFC”)-related methodology questions. In the NYISO’s system, ATC is used only as an instantaneous indication of the existence of uncongested transmission paths. As the Commission observed in a 2010 order approving a NYISO petition for interpretation of the North American Electric Reliability Corporation’s (“NERC”) then-effective MOD-001-1 and MOD-029-1 transfer capability calculation standards, the NYISO’s internal

⁴ See 126 FERC 61,297 at PP 17-18. The Commission did not extend CSC’s waivers in 2015 as part of its ruling that CSC did not need to comply with, or obtain waivers of, standards that did not apply to it.

paths are not ATC Paths and “reservations beyond one day in advance are not permitted” in the NYISO’s system, “except on external interfaces.”⁵ Moreover, the Commission has concluded that the NYISO’s calculations of ATC for its Internal Interfaces was necessary only to support ATC calculations for its External Interfaces.⁶ Additionally, these standards require the posting of this information using the “systemdata” template, which the NYISO does not use. The NYISO has been granted waiver from WEQ-002-4.3, *et seq.*, which defines the OASIS templates.

The MTF is an External Interface within the NYISO framework. The NYISO is responsible for calculating and posting the ATC and Total Transfer Capability (“TTC”) for the MTF that the NYISO uses when determining whether to grant or deny transmission service on the MTF. The MTF Provider uses the TTC that the NYISO calculates for the MTF.⁷ The long-term and short-term ATC that the MTF Provider posts in accordance with proposed NYISO OATT Section 41.21 is used to manage MTF Reservations; it is not used to grant or deny transmission service on the MTF. Proposed NYISO OATT Section 41.3.1.4(c) requires the MTF Provider to post notice of all derates that are expected to have a duration of one month or more, including the reason(s) for the derate if known. Because the requirements of these standards are not relevant to the services that the MTF Provider will offer under proposed NYISO OATT Sections 41.3.1.4(c) and 41.21, they are not applicable to the MTF Provider.

- **WEQ-001-17, *et seq.* (Actual and Forecasted Load):** This standard requires the posting of actual daily peak load and final forecasted system-wide load using the OASIS “systemdata” templates. The NYISO posts this information, but does not do so using the “systemdata” template. The NYISO has been granted waiver of WEQ-002-4.3, *et seq.*, which defines the OASIS templates. Consistent with the NYISO’s discussion of Section 37.6(b)(3)(iv) in Attachment II, the MTF Provider does not serve any load or make load forecasts. This standard therefore does not apply to the MTF Provider.
- **WEQ-001-20, *et seq.* (Rollover Rights):** This standard requires Transmission Providers to post information relevant to rollover rights upon approving a Long-Term Firm Point-to-Point request with rollover rights. The MTF Provider will comply with this requirement on its OASIS.
- **WEQ-001-21, *et seq.* (Granting and Managing a CCO Reservation):** This standard requires Transmission Providers to post information regarding granting and managing a Conditional Curtailment Option (“CCO”). The NYISO OATT does not include the *pro forma* OATT provisions for conditional firm service as the Commission has found that it was unnecessary for ISOs/RTOs administering real-time energy markets, such as the NYISO, to adopt those provisions.⁸ The NYISO’s existing waiver is also supported by the language of Appendix 001-C to WEQ-001, which provides that Conditional Firm Service-related requirements do not apply to RTOs/ISOs that administer real-time energy

⁵ *North American Reliability Corp.*, 132 FERC ¶ 61,239 at P 23 (2010).

⁶ *N.Y. Indep. Sys. Operator, Inc.*, 134 FERC ¶ 61,255 (2011).

⁷ See proposed NYISO OATT Section 41.21.1.

⁸ *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, at P 13 (2007).

markets. WEQ-001-21 is not applicable to the MTF Provider because, as explained in proposed NYISO OATT Sections 41.3.1.6 and 41.3.1.8, the NYISO is responsible for all curtailments of transmission service on the MTF and conditional firm service will not exist on the MTF.

- **WEQ-001-22, *et seq.* (Information to Audit Usage of CBM):** This standard requires Transmission Providers to post all scheduled use of Capacity Benefit Margin (“CBM”) and curtailments of these schedules. The NYISO does not set-aside transmission capacity as CBM and CBM is, therefore, not relevant within the NYISO’s market design.⁹ Proposed NYISO OATT Section 41.21.5 explains that the NYISO also does not set transmission capability on the MTF aside as CBM. WEQ-001-22, *et seq.* is therefore not applicable to the MTF Provider.
- **WEQ-001-A (Appendix A - Queue Hoarding) and WEQ-001-B (Appendix B - Redirect Business Practice Standards Examples):** These appendices are relevant to the processing of multiple and identical transmission service requests and redirect requests. The NYISO does not use a physical transmission reservation system to facilitate transmission service requests and has waivers of these requirements. WEQ-001-A (Appendix A) is inapplicable to the MTF Provider because it also does not have or need rules governing multiple and identical transmission service requests. WEQ-001-B (Appendix B) is likewise inapplicable to the MTF Provider because it will not support redirect requests.
- **WEQ-002-3, *et seq.* (Information Access Requirements):** These standards concern the procedures for providing access to information through the use of OASIS Nodes and specify how users access information on OASIS, registration and login requirements, and user interaction procedures. For example, WEQ-002-3.4(i) requires all posting and updating of transmission service information, as well as all user logins, disconnects, download requests, service requests and all other transactions to be time stamped and stored in an OASIS audit log. WEQ-002-3.6(b) and (c) require customers to submit a request to purchase or resell service through the OASIS Node. The NYISO has waivers of these requirements. The MTF Provider OASIS will have the technical attributes and functionality necessary to comply with these standards to the extent that they are applicable.
- **WEQ-002-4 (General OASIS and PTP Interface Requirements):** The MTF Provider’s OASIS will only be used to administer MTF Reservations, not to grant transmission service or to provide or purchase Ancillary Services. Transmission service and Ancillary Services must be obtained from the NYISO’s markets, consistent with the NYISO’s Tariffs and market rules. Because only MTF Reservations (a limited purpose product) are available on the MTF, the obligation of the MTF Provider to employ OASIS Data Templates that include data elements that were developed to address (a) requests for, multi-step negotiation of, and the granting of physical transmission service, (b) purchase and sale of Ancillary Services, and (c) security events, including service curtailments, significantly exceed the proposed responsibilities of the MTF Provider. This standard is therefore inapplicable to the MTF Provider because the vast majority of the

⁹ NYISO OATT Section 9.7.

responsibilities addressed in the OASIS Data Templates belong to the NYISO and/or are not relevant to the MTF Provider.

- **WEQ-002-4.2.10 (Transaction Process), WEQ-002-4.2.11 (Reference Identifiers), WEQ-002-4.2.12 (Linking of Ancillary Services to PTP Transmission Services), and WEQ-002-4.3, et seq. (General OASIS and Template Descriptions):** These standards establish naming conventions and other procedural requirements related to the processing of physical transmission reservations which are not relevant under the NYISO's financial reservation model. The MTF Provider is administering MTF Reservations, which is a simpler process than the grant of transmission service which occurs under the NYISO's OATT and market rules. By contrast, the identified WEQ-002-4.2 standards were developed to address a more complex process of online negotiation of transmission service requests, than the MTF Provider is expected to implement consistent with proposed NYISO OATT Sections 41.18.6 through 41.18.8. In addition, in 2009, the Commission granted CSC waiver of the online negotiation and confirmation process in WEQ-001-4.¹⁰ WEQ-002-4.2 imposes more detailed implementation standards for WEQ-001-4. The NYISO explains above that WEQ-001-4 is inapplicable to the MTF Provider for the same reasons that waiver was granted to CSC. It follows that WEQ-002-04.2.10–12 are inapplicable to the MTF Provider. Adopting them would serve no useful purpose but would impose an overly complex on-OASIS negotiation process that is not consistent with proposed NYISO OATT Sections 41.18.6-41.18.8.
- **WEQ-002-4.3.6.2.1 (Interface Requirements - Renewal Positions (rollover)):** To the extent that rollover rights are expressly included in a negotiated contract between the MTF Provider and the purchasers of rights on the MTF, the MTF Provider will comply with this requirement on its OASIS.
- **WEQ-002-4.3.6.2.2 (Interface Requirements - CCO Provisions):** The NYISO OATT does not include the *pro forma* OATT provisions for conditional firm service, because the Commission has found that it was unnecessary for ISOs/RTOs administering real-time energy markets to adopt those provisions.¹¹ Appendix 001-C to WEQ-001 also provides that Conditional Firm Service-related requirements do not apply to RTOs and ISOs with real-time energy markets. Similarly, no conditional firm service option is available on the MTF. This standard is therefore not applicable to the MTF Provider.
- **WEQ-002-5, et seq. (Implementation and Performance Requirements):** These standards establish performance requirements for the OASIS Nodes. The standards set forth certain specifications to be met for sizing, response to user queries, availability, backup and other performance requirement parameters for the OASIS Nodes. Because WEQ-002-5's parameters pertain to OASIS Node and OASIS Data Templates (WEQ-002-4.3, et seq.) that are not relevant to the MTF Provider, it follows that WEQ-002-5 is not applicable to the MTF Provider.
- **WEQ-003, et seq. (OASIS Data Dictionary):** This standard includes a list of technical data element definitions, "element names," and file formats which were designed with

¹⁰ See 126 FERC 61,297 at PP 15-16.

¹¹ See Order No. 890 at P 13.

physical reservation systems in mind that are not relevant under the NYISO's financial reservation model. The NYISO has had a waiver of WEQ-003 since 2008, to the extent that it applies to transmission reservations. The "Introduction" to the WEQ-003 OASIS Data Directory emphasizes that, "This OASIS Data Dictionary established Data Element specifications for OASIS. In the event of a conflict between these Business Practice Standards and the Transmission Provider's tariff, the tariff shall have precedence. A Transmission Provider is not obligated to implement a particular requirement in an OASIS Data Dictionary Business Practice Standard if the Transmission Provider's tariff does not contain the associated provision or the Transmission Provider has received a waiver."¹² Accordingly, this standard is only applicable to the MTF Provider to the extent that proposed NYISO OATT Section 41 assigns responsibilities to the MTF Provider that are relevant to the OASIS Data Dictionary requirements. To the extent that this standard is applicable to the MTF Provider, it will comply with this standard.

- **WEQ-004, et seq. and WEQ-004 Appendix A and Appendix C (Coordinate Interchange – e-Tagging Service Performance and Transaction e-Tag Actions):** As previously noted, WEQ-004 is not applicable to Transmission Providers or Observers and thus is facially inapplicable to the MTF Provider.
- **WEQ-005, et seq. (Area Control Area Equation (ACE) Special Cases), WEQ-006 (Manual Time Error Correction), et seq., and WEQ-007 (Inadvertent Interchange Payback), et seq.:** As noted in Section II of the Response, these WEQ standards are applicable to Reliability Coordinators and Balancing Authorities, not to Transmission Providers, and thus are facially inapplicable to the MTF Provider.
- **WEQ-008, et seq. (Transmission Loading Relief (TLR) – Eastern Interconnection:** This standard applies to BAs, LSEs, PSEs, RCs and Transmission Service Providers ("TSP") in the Eastern Interconnection but not to Transmission Providers or to Observers. It is therefore facially inapplicable to the MTF Provider. In practice, if Import transactions on the MTF are cut by a TLR, NYISO, which is a TSP that complies with WEQ-008, will: (1) instruct the MTF Provider to implement the reductions; and (2) make the reductions to the Import transaction schedules.
- **WEQ-011, et. seq., (Gas/Electric Coordination):** As noted in Section II of the Response, these WEQ standards are applicable only to Reliability Coordinators and Balancing Authorities and to certain Wholesale Gas Quadrant entities. They are not applicable to Transmission Providers and thus are facially inapplicable to the MTF Provider. In addition, the MTF Provider does not control any generation or pipeline facilities and does not administer an integrated transmission grid. It would therefore not have a role in gas-electric coordination even if WEQ-011 were facially applicable.
- **WEQ-012, et. seq. (Public Key Infrastructure (PKI)):** This standard would apply to the MTF Provider to the extent that the services that it provides require the use of PKI-

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compliant electronic certificates. Thus, the MTF Provider will comply with this requirement to the extent applicable.

- **WEQ-013, *et seq.* (Business Practices for Open Access Same Time Information Systems (OASIS) Implementation Guide):** These standards establish an OASIS Implementation Guide that outlines the basic OASIS transaction process, and provides additional requirements and guidance for processing specific types of business transactions in the implementation of OASIS. WEQ-013 provides the processes for transmission service requests, secondary market requests, renewals of expiring transmission contracts, redirects, and resales. The NYISO has obtained waivers of these requirements because they relate to processes that do not exist under the NYISO's financial reservation transmission system. WEQ-013 likewise does not apply to the MTF Provider to the extent that it implements transmission service request, secondary market request, transmission contract renewals redirect, and resale rules that are not part of proposed NYISO OATT Section 41's framework.
- **WEQ-013-C (File Request and Download Examples):** This appendix contains examples of how file request and download interactions that are conducted via OASIS are implemented. To the extent that these examples pertain to services offered or functions performed by the MTF Provider the MTF Provider will act in accordance with them.
- **WEQ-015 (Measurement and Verification (M&V) of Wholesale Electricity Demand Response (DR)):** The WEQ-015 standards apply to Independent System Operators and Regional Transmission Organizations, not to Transmission Providers or Observers, and thus are facially inapplicable to the MTF Provider. Moreover, the MTF Provider has no role in administering wholesale demand response measures.
- **WEQ-020 (Smart Grid Standards Elements Table):** This standard would be applicable to the MTF Provider.
- **WEQ-021 (Measurement and Verification (M&V) of Energy Efficiency Products):** The WEQ-021 standards apply to Independent System Operators and Regional Transmission Organizations, not to Transmission Providers, and thus do not apply to the MTF Provider.
- **WEQ-022 (Electric Industry Registry):** This standard requires different types of entities to register in NAESB's Electric Industry Registry based on their functional registration. The MTF Provider would only be subject to WEQ-022 requirements that apply to "Observers" because it does not belong to any of the other entity types that are subject to this standard.
- **WEQ-023 (Modeling):** NAESB's Modeling standards establish requirements for calculating ATCs and AFC values. The MTF Provider will not calculate AFCs and will only calculate ATC for the purpose of determining available MTF Reservations for the single posted path that the MTF represents. Accordingly, only those portions of WEQ-023 that are relevant to MTF ATC calculations will apply to the MTF Provider.
- **WEQ-023-5, *et seq.* (Postback Requirements):** This standard (previously WEQ-001-18) requires Transmission Providers to incorporate Postbacks of redirected services in

their ATC postings. The NYISO's financial reservation system does not use redirect requests, so the NYISO does not have Postbacks to incorporate into its ATC postings. The NYISO, therefore, has a waiver of this requirement. The CSC also received a waiver of WEQ Standards 001-9.1 through 001-10.8.7 in 2009 because redirects and alternate Points of Receipt are not available on its single path merchant transmission facility. The same is true for the MTF. Accordingly, this standard is not applicable to the MTF Provider.

- **WEQ-023-6, *et seq.* (Grandfathered Agreements):** This standard (previously WEQ-001-19) requires Transmission Providers to identify the treatment of grandfathered agreements in the Existing Transmission Commitments (“ETC”) component of its ATC/AFC calculations. This standard is not applicable to the MTF Provider because there are no grandfathered agreements on the MTF. Proposed NYISO OATT Section 41.1 identified the Initial MTF Reservation Holder and specifies both the quantity (all 1250 MW) and the 40 year term of its MTF Reservations.
- **WEQ-023-A (Appendix A - Postback Conditions for Use in Calculation of ATC or AFC, as Appropriate):** This standard (previously WEQ-001-D) provides a table identifying “potential Postbacks and the conditions for use by the Transmission Provider in the determination of firm and non-firm ATC or AFC.” As explained above for WEQ-023-05, the NYISO's system does not use redirect requests and the NYISO has a waiver of this standard. WEQ-001-D (Appendix D) should not apply to the MTF Provider for the same reason the NYISO explained above why WEQ-023-5, *et seq.* should be waived.
- **WEQ-024 (Cybersecurity Business Practice Standards):** These standards apply to various types of entities and to Observers but not to Transmission Providers. WEQ-024 is therefore applicable to the MTF Provider to the extent that its relatively limited role administering the MTF Provider OASIS requires secure electronic communications and commercial transactions. The MTF Provider OASIS will use OATI's standard implementation. It therefore will adhere to the technical specifications, and have the functionality, required by WEQ-024.
- **WEQ-024-1.1, *et seq.* (Network Architecture Requirements):** These standards, previously WEQ-002-2, *et seq.*, set forth requirements for the architecture of OASIS Nodes. They require compliance with certain Internet connectivity requirements and support for specific Internet tools, both for use over the public Internet and private connections between users and OASIS Nodes. The NYISO has waivers of these requirements based on its waivers of the obligations to use OASIS Data Templates (WEQ-002-4.3, *et seq.*) and the OASIS Data Dictionary (WEQ-003). WEQ-024-1.1 is applicable to the MTF Provider to the same extent as WEQ-002-4.3 and WEQ-003. The MTF Provider OASIS will have the technical attributes and functionality necessary to comply with these standards to the extent that they are applicable.
- **WEQ-025 (Grid Services Supporting Wholesale Electric Interactions):** The WEQ-025 standards apply to Transmission and Distribution Service Providers (“TDSPs”) and to certain other types of entities, but not to Transmission Providers or Observers. They are therefore facially inapplicable to the MTF Provider.