

1 BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION
2 Technical Conference
3 Electronic Filing Protocols for Commission Forms

4 Docket No. AD15-11-000
5 Thursday, June 10, 2015
6 Washington, DC
7 Hearing Room 2C
8 888 First Street N.E.
9 Washington, DC 20426

10 Pursuant to notice, at 10:00 a.m., when were
11 present:

12 FERC STAFF:

13 NICHOLAS GLAD, OG
14 MIKE GOLDENBERG, OGC
15 ROBERT HUDSON, OE
16 LARRY PARKINSON, Director, OE
17 GERRY THOMAS, OCIO

18 PRESENTERS:

19 Jonathan Booe, NAESB

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24 Court Reporter: Kim M. Brantley, Ace-Federal
25 Reporters, Inc.

1 P R O C E E D I N G S

2 (10:05 a.m.)

3 MR. HUDSON: Good morning. My name is
4 Robert Hudson, I'm here on behalf of the E-Forms
5 Technical Conference. This conference is being
6 held pursuant to the Commission's April 16th Order
7 instituting proceedings to develop electronic
8 filing protocols for Commission forms, to discuss
9 the transition to a new submission format for
10 certain forms, and NAESB's assistance in the
11 process of developing standards for the submission
12 of data to the Commission for forms 1, 1F, 2, 2-A,
13 3Q Electric, 3Q Natural Gas, 6Q, FERC 60, and FERC
14 714.

15 This technical conference will explore
16 transitions of the XML format as well as the
17 protocols and standards needed to provide metadata
18 that will enable the Commission to develop a
19 database to track the information submitted to the
20 Commission in those forms.

21 And now I'll turn it over to the
22 Director of the Office of Enforcement, Larry
23 Parkinson to get us started.

24 MR. PARKINSON: Thanks, Rob.

25 Good morning, welcome everybody and

1 welcome to all those folks online. I send my
2 regrets from the chairman. Chairman Bay was going
3 to be here this morning but got called up to the
4 Hill. Sometimes that causes him to jump in a car
5 and head elsewhere. So he wanted to be here to
6 welcome everybody and thank folks for their
7 efforts, so I'm standing in for him.

8 I want to start by thanking the natural
9 gas, electric and oil industries for their
10 cooperation in getting this effort underway and
11 providing staff with really critical input.

12 In particular, I want to thank the
13 Edison Electric Institute, the Association of Oil
14 Pipeline Users, the Interstate Natural Gas
15 Pipeline Association, and the National Rural
16 Electric Cooperative Association.

17 I also want to thank the North American
18 Energy Standards Board for agreeing to take on
19 this project. NAESB, as you know, serves as an
20 industry forum for the development and promotion
21 of standards which will lead to a seamless
22 marketplace for wholesale and retail natural gas
23 and electricity. For this project, NAESB agreed
24 to work with the oil industry, in particular on
25 form 6 and 6Q, and I want to thank them for

1 they're willingness to take on this work with that
2 segment of the industry. I'm confident that we
3 will see the same level of cooperation and
4 attention to industry input and perspectives that
5 we have seen in the natural gas and electric
6 industries.

7 The E-Forms Refresh Effort is a high
8 priority of the Commission. It's critical to our
9 mission. Technological logical advances have
10 greatly improved the ability to efficiently and
11 effectively collect, house and make accessible
12 large amounts of data. Providing transparency to
13 the market is critical to ensuring
14 well-functioning markets and the Commission is
15 committed to providing the best service possible
16 to the public, and to do so we have to keep pace,
17 the Commission has to keep pace with technological
18 advances. So this is critical for that effort.

19 For the Refresh Effort to be
20 successful, it's important that public input is
21 provided throughout the process, and we look
22 forward to that. We need to design a replacement
23 for the current software which is cost effective,
24 efficient and meets the needs of the Commission,
25 industry and the public.

1 The type of collaborative effort we
2 adopt today has worked very well in designing the
3 format and the rules governing electronic tariff
4 submissions, and I hope with your help and with
5 the assistance of NAESB, this project will be
6 equally successful.

7 Staff will continue to keep the
8 Commission informed along the way, as we move
9 along. We will be representing the Commission and
10 ensure that the goal of developing an efficient
11 and effective means for collecting, housing and
12 making accessible e-forms data through the
13 collaborative effort is make.

14 So I want to thank everybody again for
15 your efforts and for your input, and I know this
16 will be a several-month project, so thank you for
17 contributing to a very important mission here.

18 And with that I'll turn it over to
19 Staff.

20 MR. HUDSON: Thanks, Larry. Again my
21 name is Rob Hudson. I'm the project lead from the
22 Office of Enforcement, the Market Analysis
23 Division. We have a lot of information to cover
24 and I ask that you hold your questions 'till the
25 end of the presentations, and when you do we will

1 have a microphone to go around, so those people
2 that are watching online can also hear the
3 questions.

4 If there are any members of the press
5 here, please see me after the conference and I
6 will connect you with the right office.

7 To those watching online, we have an
8 e-mail address set up. It's
9 eforms.refresh@ferc.gov where you can e-mail your
10 questions at any time to us and we will read them
11 during the question and answer session if there's
12 time. And if there's not, we will definitely get
13 back to those that we can't address today.

14 Official comments on the technical
15 conference may be submitted until June 30th in the
16 AD15-11 docket, and this conference is being
17 transcribed and will be available. Please see the
18 conference notice for those instructions.

19 There's more information along with the
20 presentations that we are presenting that are on
21 FERC's e-forms page on the website.

22 And then of course Staff views and
23 opinions you hear this morning do not necessarily
24 reflect that of the Commission or the opinion of
25 any individual Commissioner.

1 So, to talk a little bit about what
2 we're going to talk about, I'm going to cover an
3 overview of Visual Fox Pro to XML. Gerry Thomas
4 the Director Assistant Engineering Division from
5 the Office of the Chief Information Officer will
6 then do a longer IT presentation that's a lot more
7 technical to talk about the database structure and
8 other things, and then Jonathan Booe, the
9 Executive Vice President and Chief Administrative
10 Officer from the North American Energy Standards
11 Board will talk about their process and how
12 they're customizing it and how you can be involved
13 in that. Then we'll have our Q and A session, and
14 Nicholas Glad from the Office of General Counsel
15 will join us.

16 So, we've been using electronic forms
17 here at the Commission for several years, and
18 currently the Commission had licensed and
19 distributed Microsoft Visual Fox Pro, gave it to
20 filers free of charge, and made updates to the
21 form and distributed them as needed with each new
22 item that needed to be collected.

23 Microsoft has discontinued and no
24 longer supports Visual Fox Pro. As of January
25 13th, 2013, it's completely unsupported.

1 So, we're moving to XML. It's a market
2 language that defines a set of rules for encoding
3 documents in a format which is both human readable
4 and machine readable. It's based on free and open
5 standards.

6 This will be the language for
7 delivering the data to the Commission. It's not
8 the method of delivery. That will be done via a
9 simple Internet upload and possibly some other
10 direct portal or something that's yet to be
11 decided.

12 So think of XML as the dollar for the
13 Internet. The Commission doesn't accept any other
14 type of currency reporting because it will be
15 difficult to make repairs across balance sheets,
16 profit and loss statements, et cetera. As such,
17 for transparency and efficiency, the Commission is
18 moving towards one common data reporting standard,
19 like the dollar, which is XML.

20 Filers are free to keep their books,
21 their data in whatever currency or format that
22 they wish, just convert it to the dollar or XML
23 when reporting to the Commission.

24 Currently filers type this information
25 into Visual Fox Pro and that program serves as

1 both the conversion and the submission for this
2 data. But by moving from VFP to XML, we're also
3 moving away from dictating what filers must use to
4 convert their data and a longer process of
5 submitting it by using the software application.

6 The North American Standards Board will
7 speak more on their development process and how
8 they will apply that to this project when Jonathan
9 gets up here. But they serve as an industry forum
10 for the developments and promotion of standards.
11 They're a consensus- based organization. And as
12 mentioned previously, they currently work with the
13 wholesale and retail natural gas and electricity
14 markets, but they have also agreed to take this on
15 for the oil pipeline industry, and the Commission
16 has enlisted their help and many other standards
17 processes.

18 The scope of the E-Forms Refresh
19 Project is limited to the process design for
20 submitting the data. As such, this project will
21 not involve discussions or recommendations on the
22 substantive changes to any of the information
23 required on those forms that are currently
24 required by the Commission.

25 Modifying the filing requirements

1 concurrently with building a database system for a
2 new electronic filing process has proved
3 problematic in the past, and so we're going to
4 separate those two at this time.

5 We have not decided a sequence to take
6 on the forms, both in how the recommendation for
7 the working groups and how they're generated or
8 the implementation at the end. That's going to be
9 decided throughout this process. And NAESB of
10 course probably has some thoughts as to how to
11 tackle this going forward and they will be the
12 instrument that helps the industry define how they
13 want to go ahead with defining new standards.

14 We plan to address the concerns of all
15 customers in this process. Industry filers, we
16 understand that they're interested in an efficient
17 and cost-effective way to comply with the
18 Commission's obligation.

19 Commission Staff, we want to increase
20 your ability to perform analysis on this
21 information and how we can get to the data more
22 effectively than how it's currently submitted or
23 even stored. And then other interested parties we
24 want to increase the transparency of how they get
25 this data. The reports that we can generate for

1 them automatically and all those things are
2 questions that are unanswered and will be answered
3 throughout this process.

4 So as I said, Microsoft doesn't support
5 Visual Fox Pro any longer. The last major release
6 was in 2004. There hasn't been any security or
7 upgrade since, and all software support for VFP
8 was discontinued earlier this year. Even previous
9 versions were not capable to keep up with some
10 Commission requirements. So, for that reason
11 alone we must transition to another format as soon
12 as possible.

13 To date, we have eliminated use of
14 Visual Fox Pro only for several forms, including
15 the EQR filings. There's ten forms that need to
16 be transitioned, the ten forms in this process.

17 While we go through this, we will
18 continue to receive data through the current
19 machination of Visual Fox Pro. So those deadlines
20 will not change and that process doesn't change
21 until this whole E-Forms Refresh Project concludes
22 and is implemented.

23 So let me talk a little bit about the
24 XML format and why XML is best. It facilitates
25 sharing across different information systems and

1 across platforms. It's a software- and
2 hardware-independent way to store the data. It's
3 a plain text format so you can open it up with a
4 Notepad application on any computer or pretty much
5 with any application you can open these files
6 with. It upgrades easily. There is no
7 complicated conversion because of these things.

8 Some consider XML self-describing. The
9 best way to describe that is with a metaphor.
10 It's kind of like a cardboard box. A cardboard
11 box is like XML. I can have information printed
12 on it, like it contains TVs and cables made in
13 Japan. Likewise, XML has element and attribute
14 names that describe the contents of the package,
15 which is the data.

16 So a cardboard box is like XML.
17 They're self-describing and as opposed to the
18 traditional, positional method like CSB where data
19 has to be in its correct location within the file
20 and separated by the correct number of commas, XML
21 just tells you exactly what's coming and what's
22 next and labels it.

23 E-Tariff is currently submitted in XML.
24 Industry objected to Visual Fox Pro when that
25 process rolled out. We also used NAESB at that

1 time for the E-Tariff process. It created an
2 industrywide consensus on how to move forward with
3 implementing the standards for E-Tariff.

4 Even the SEC requires submissions in
5 their version of XML. So, the benefits of XML are
6 numerous. It's not proprietary, which means it
7 won't be discontinued at any time, which is what
8 we're facing right now with Visual Fox Pro, and
9 we're not at the mercy of the next software update
10 to press past security risks.

11 So transitioning to another format can
12 also be difficult with a software application like
13 Visual Fox Pro or something else in this case, and
14 for those reasons no software application is as
15 customizable as XML. It allows the filer to
16 customize their system to suit the specific needs
17 of their system. The industry is allowed to --
18 all it has to do is package the information that's
19 currently in their system into XML and then send
20 then it to us. It can either be designed in house
21 or by their IT, and there's many software vendors
22 out there in the market that can also provide
23 these services.

24 So as I mentioned earlier, official
25 comments may be submitted until June 30th in

1 docket AD15-11.

2 And so, the NAESB process, once it gets
3 kicked off of here, it's going to seek to develop
4 through stakeholder engagement a single general
5 approach for transitioning all the Commission
6 forms in this project that are in VFP. We're
7 going to look at the similarities across all forms
8 and try to see what deficiencies that we can make
9 in that aspect, while also addressing the data
10 specific to each industry.

11 And at the end the Commission would
12 like to receive a recommendation that talks about,
13 among other things, the validation of the XML,
14 what type of data fields have to match with other
15 data fields, or are there formulas that need to be
16 in place that would kick the submission out if
17 they failed; what language would be in those type
18 of e-mails that go out to the filer, so you
19 understand why there was an error; how to address
20 the numerous footnotes which are on the form,
21 which are an inherent problem right now; and how
22 are we going to incorporate that type of
23 information into the filing.

24 We'll do also recommendations on simple
25 things about date formatting or currency decimal

1 places, suggestions regarding public availability
2 and how to format the forms once it's in our
3 system to it can be outward facing and increase
4 transparency, and then clarification of the
5 definitions, meaning many of the fields, so it's
6 very simple for anyone to read and understand what
7 profit means, or what any of those data fields
8 actually pertain to.

9 So, in conclusion again, we're here to
10 express the importance of involving all industries
11 in this transition. We're open to all suggestions
12 and we'll take questions at the end of all
13 presentations.

14 I'll now turn it over to Gerry Thomas
15 who will speak specifically on IT considerations.

16 MR. THOMAS: Thanks. We're bringing up
17 the next set of slides right now.

18 I think most of what I'll be talking
19 about is kind of an extension of what Rob has
20 already gone through, maybe a little bit more
21 sequence of how we're going to tackle this from a
22 technical solution.

23 You can go to the first slide. Next
24 slide.

25 So the first thing we're going to have

1 to do is kind of understand how are we going to
2 get from these VFP databases to something else,
3 and just as kind of a visual, in the back of the
4 room here we have printed out the form databases
5 that we're working with. The ten forms that we're
6 replacing are actually maintained in these five
7 databases.

8 As you can see there's a lot of tables,
9 a lot of fields underneath these forms, and we're
10 going to have to spend the time to kind of
11 deconstruct each one of those and reconstruct them
12 into some new format.

13 Actually each table and each form
14 contains one page or set of pages from each of the
15 various forms, the 126-60, et cetera, so as you
16 know, those of you who have been filing, the idea
17 of downloading a sip file with dozens of
18 individual databases, that's what we're replacing.
19 We're going to be moving away from that to the XML
20 solution that Rob has described.

21 The initial step process is, to kind of
22 go through more in specifics what I was just
23 describing. We're going to have to go through the
24 tables, find common elements, normalize the tables
25 and ultimately come up with a single database

1 internally here at FERC that will maintain all of
2 this information.

3 And there's kind of two threads to
4 these activities. One is that activity of redoing
5 the database, where we're going to contain the
6 data, and the second piece is the public file, how
7 are you going to get the data to us in an XML
8 format.

9 As Rob mentioned, this is a technical
10 refresh only. Of all the elements here as are
11 related to the forms and the data you filed today,
12 the exercise is not to change what you filed.
13 It's just the mechanism on how you're going to
14 file things, or how you're going to file. It's
15 getting away from that VFP container to XML files
16 that will be submitted to us. It's not a business
17 reengineering effort of any kind. It's not a data
18 reengineering effort. It's going to be the same
19 elements we have today.

20 A change will be, as with E-Tariff,
21 that we have come before with EQR, and we will be
22 requiring CID's to be utilized for company
23 identification for all filings. Additionally we
24 will also have to accommodate a design that brings
25 in the footnotes that are available pretty much

1 for all fields on all forms that are filed.

2 I think, Rob, you did cover most of
3 what we were going to talk about here. As for
4 information collections in general, we're moving
5 to XML as that common standard, that common
6 currency I think is what Rob used, and he
7 discussed some of the reasons of why we would go
8 with the comma separated or the tab separated.

9 For us XML is a much stronger parsing
10 utility and for us it minimizes internally what we
11 have to do for software development and cost to
12 maintain these forms by moving towards an XML
13 solution.

14 (Next slide)

15 This is just retouching on the NAESB
16 portion of this. I think from the technical side
17 we will be working -- and I think we'll be getting
18 together to find out the best strategy to map
19 technically what are we doing here at FERC as we
20 begin to change our databases on the collection
21 capability, join forces or look to NAESB to help
22 us kind of facilitate some of that discussion as
23 we embrace the industry's comments and their own
24 input on what's going to be most efficient for
25 all.

1 I think Rob touched on this, as well.
2 There's really two large sets of consumers of this
3 information. There's our internal staff that
4 consumed the data within FERC. As we reengineer
5 our database, or create a database from the
6 databases here, we're going to be very focused on
7 how are they pulling the data out of the forms
8 today, you know, how can we optimize that for
9 them, how can we give our staff more options in
10 getting through the data quickly and more
11 efficiently and get away from the many, many
12 databases that they have to work through today.

13 Additionally we have to look at how can
14 we do this in a way that the filers understand and
15 we can accommodate us, and also make the data
16 available in an easily accessible way and easily
17 consumable way for anybody who wants to consume
18 it, whether the industry, the filers themselves,
19 academics, anybody who would want to use this data
20 we want to make it as user friendly or useful as
21 possible.

22 And I think as Rob mentioned,
23 everything that will be filed will have to be
24 formatted in some human readable version for
25 E-Library. Every filing will still be maintained

1 in E-Library, as well.

2 (Next slide)

3 So the next steps. What are we going
4 to do next? We're going to start breaking down
5 our databases and start working on that new
6 database design. NAESB is here today. We're
7 going to start planning with them on how we can
8 work with them to get to the XML filing solution;
9 we will be looking to OE to help us with the
10 timetable around us as we communicate with the
11 filers on when these things are going to happen;
12 and then, you know, we will plan with those that
13 are going to file and use these systems to make
14 sure that we have acceptable time periods to test
15 the filings to understand how are we going to test
16 the periods and ultimately get to the final date,
17 and also work on -- if we need future technical
18 conferences, which I'm sure we probably will as
19 some of this starts to become more concrete, we
20 can give you more specifics on what this is going
21 to look like.

22 So I think that's my portion.

23 So, John...

24 MR. BOOE: Sure. So good morning. On
25 behalf of NAESB I want to thank the Commission and

1 Commission staff for inviting us to participate in
2 this technical conference. My name is Jonathan
3 Booe and I'm a member of the NAESB staff. Before
4 I get started I need to give a short disclaimer
5 that my comments today are strictly for
6 informational or educational purposes and are not
7 intended to advocate for the adoption of any NAESB
8 standard or work product.

9 So this morning I'd like to talk to you
10 a little bit and introduce you to NAESB. For
11 those of you who are not familiar with our
12 organization, I'm going to speak a little bit
13 about our process, share a little bit about the
14 past development efforts, specifically the
15 E-Tariff effort, and then discuss some options for
16 standards development at NAESB if standards are
17 pursued. Of course after that I'd be happy to
18 answer any questions.

19 So, for background, NAESB, according to
20 the Gas Industry Standards Board, was created
21 about twenty years in 1994. We had a lot of
22 support from the Department of Energy and the
23 Commission obviously. We were formed to support
24 the Commission's efforts to standardize the
25 information that was communicated by the pipelines

1 for communicating natural gas transactions and
2 also to develop posting requirements for the
3 electronic bulletin boards of pipelines.

4 Since that time we have grown quite a
5 bit and expanded but we still serve the same
6 purpose -- and if you will go to the next slide --
7 I've put our scope statement up there. Today
8 NAESB is an American National Standards institute,
9 or anti-credited standards developed organization,
10 and we develop standards for the wholesale and
11 retail natural gas and electric markets.

12 We have membership of over three
13 hundred corporate members that represent every
14 segment in the industry. In between our member
15 participants and our non-member participants we
16 have about two thousand volunteers that actually
17 support the standards development activities.

18 We continue to maintain strong working
19 relationships with the FERC, NARUC, the National
20 Association of Regulatory Utility Commissioners or
21 on the state side, and the Department of Energy.
22 We also often work with the North American
23 Electric Reliability Corporation, or NERC, in
24 support of their wholesale market electric
25 reliability standards.

1 Today we maintain nearly four thousand
2 standards and with very few exceptions all of our
3 standard have been adopted by the Commission, all
4 of our wholesale standards incorporated in their
5 regulation. A number of our retail market
6 standards have been adopted by state commissions
7 and mandated in similar manner, mostly in customer
8 choice states.

9 In the wholesale market we have
10 developed nearly two thousand standards that cover
11 a wide range of market transactions, including the
12 standards required to schedule power on the bulk
13 electric system; energy, efficiency and demand
14 response standards; cyber security standards;
15 market standards, and a number standards to
16 support NERC.

17 In the wholesale gas market, we have
18 nearly six hundred business practice standards.
19 These standards address the process for nominating
20 and confirming gas on the interstate gas pipeline
21 system, gas quality issues, gas electric market
22 coordination, and a number of standard contracts
23 for the purchase and sale of short-term natural
24 gas. We're on our twelfth version of standards
25 for the wholesale gas market and on our sixth

1 version of standards for the wholesale electric
2 market.

3 As I mentioned, in addition to that we
4 also have over fourteen hundred retail standards
5 to support both retail electric and retail gas
6 markets.

7 Outside of that we also maintain a few
8 industry tools such as the Electric Industry
9 Registry, the E-Tag Functional Specification, and
10 the Common Coding system that supports the data
11 points for interstate pipelines across the
12 country.

13 Additionally, like many other
14 standards-setting organizations, we offer
15 certification programs and hold a number of
16 courses on our standards throughout the year.

17 Our organization is divided three
18 quadrants representing the wholesale gas and
19 electric markets and then of course retail market.
20 I understand that having three quadrants is a bit
21 nonsensical, but we merged our two retail
22 quadrants last year and we had to rename the
23 groupings.

24 As you can see on the slide, each of
25 the quadrants is further subdivided into

1 individual market segments. This is done with the
2 idea that the entity participating in the market
3 anywhere can identify with at least one of our
4 market segments. I can explain later how we
5 incorporated the oil interest into our E-Tariff
6 effort.

7 The organization is governed by two
8 bodies. A board of directors manages what the
9 organization does in terms of standards
10 development, and the executive committee manages
11 how the standards are developed.

12 Each of the three quadrants has its own
13 executive committee and annual plan. That annual
14 plan is set by the board of directors and directs
15 the quadrant standards development activities for
16 the year. Beneath the executive committees there
17 are several subcommittees that actually draft the
18 specific standards assigned in the plans, and
19 there's a slide coming up that shows our
20 relationship.

21 The important thing is that there's a
22 separation of powers, so the standards developed
23 by the executive committee cannot be impacted by
24 the process, itself, and so the standards
25 development aspects are unencumbered by other

1 organizational issues.

2 I should also mention that NAESB staff
3 are not subject-matter experts. We serve
4 completely ministerial or administrative roles in
5 the process.

6 (Next slide)

7 So this slide more or less illustrates
8 the points I was making how the board more or less
9 manages the organization and the executive
10 committees execute the standards development.

11 So as I mentioned our standards
12 development process is accredited by ANSI which
13 requires that it entail certain things, that they
14 be open, balanced and have due process in place.
15 This means that any interested party can
16 participate in the development process because all
17 of our meetings are open.

18 We really want to make sure that those
19 that are affected by the standards development
20 have a place at NAESB to help shape the standards,
21 and in fact any interested party, despite
22 membership status, can actually vote at the
23 subcommittee level on our standards.

24 All of our documentation including
25 agendas, work papers, meeting minutes, voting

1 records are all posted on our website and made
2 available. Transparency is really a major focus
3 of ours and a real key to our organization.

4 We also have specific voting procedures
5 in place to make sure that minority positions are
6 heard and so that the process can't be dominated
7 by single-interest groups, and I can explain a few
8 of those later in the presentation.

9 I do need to mention that in June 2013
10 the board of directors implemented a nominal
11 meeting attendance fee for nonmembers to cover the
12 cost of our meetings and conference calls, but the
13 cost is really non-prohibitive of participation
14 and if requested we do issue waivers on a
15 case-by-case basis.

16 So NAESB is a voluntary,
17 industry-funded standards organization, and from
18 our perspective all the standards that we
19 developed are completely voluntary, but as I noted
20 several are of our wholesale standards, a majority
21 of our wholesale standards have been adopted by
22 the Commission. Several of our retail standards
23 haven't been adopted by state commissions. But as
24 an organization we don't advocate for the adoption
25 of the standards, nor do we get involved in the

1 compliance or compliance monitoring. This is
2 totally left up to the regulatory bodies if they
3 adopt our standards.

4 When we issue a new publication of our
5 wholesale standards with gas or electric, we do
6 submit in the submission as part of the
7 informational report, we make our retail standards
8 available to state commissions on request and also
9 to NARUC, the National Association of Regulatory
10 Utility Commissioners.

11 On occasion, when requested by the FERC
12 or the state Commission, we will submit standards
13 outside of our publication schedule, but by and
14 large we stick to that schedule.

15 So NAESB does not set policy at the
16 federal or state level. That's completely left to
17 the FERC and the state Commission. The intent is
18 to find the most efficient or effective way to
19 implement the policy set by the regulators.

20 In this instance the Commission has
21 requested that NAESB consider an implementation of
22 a decision to transfer several FERC forms to a new
23 electronic format. Our goal, from a NAESB
24 perspective would be to take the guidance of the
25 Commission and work with the industry on an

1 industry-endorsed implementation.

2 So this slide provides -- I know it's
3 kind of hard to see -- a process flow for the
4 development of standards within NAESB. The
5 process begins with a request which can come from
6 a member, a nonmember, a government agency, a
7 commission. They can also be initiated by the
8 organization, itself, through the approval of an
9 annual plan item by the board of directors.

10 In the event that the request comes
11 from the industry, it gets triaged by the
12 executive committee and a vote is taken on the
13 subcommittee in which the standards development
14 should be assigned and the timing of completion.

15 In this case the request is coming from
16 the Commission and is currently under
17 consideration for inclusion on our annual plans by
18 our board of directors, so the triage process
19 isn't necessary.

20 Once a request has been triaged or
21 added to the annual plan, it's assigned to a
22 specific subcommittee within the appropriate
23 quadrant and given a completion date. This
24 subcommittee will hold a series of meetings and
25 conference calls until a recommendation is

1 approved and then a balanced vote is taken. As
2 you can see in the process there are several steps
3 that require balanced votes, and I can explain
4 that in the next few slides.

5 Once a recommendation is approved by
6 the subcommittee, it's distributed for an
7 industrywide, thirty-day formal comment period.
8 Comments can be submitted by members and
9 nonmembers. At the close of the comment period
10 all the comments are reviewed by the executive
11 committee as well as a recommendation, and then
12 they take another balanced vote to approve the
13 recommendation.

14 If approved it goes out for a
15 thirty-day membership ratification period and then
16 finally, if vetted all the way through the
17 process, it ends up in the last step and is
18 published in our standards.

19 So our voting thresholds are on this
20 slide, and as you can see the threshold for
21 adoption of our standards the executive committee
22 is sixty-seven percent or a super majority, as a
23 whole, and then also forty percent support from
24 each of the quadrants, and this is where the
25 balanced voting comes into play.

1 As I noted at the beginning of the
2 presentation, the organization, our board of
3 directors, our executive committees, they're all
4 divided by quadrant and subdivided by market
5 segment. Each segment of the market committee and
6 board of directors are apportioned an equal number
7 of seats so that each segment is equally
8 represented. As I stated, in order for a standard
9 to be adopted, it not only has to obtain overall
10 support by the economic committee but support by
11 the segments.

12 The balanced voting procedure is in
13 place to make sure that every segment of the
14 market is represented and they can't be dominated
15 by other segments. There's balanced voting at the
16 subcommittee and I'll explain that in the next
17 slide.

18 So this slide provides example. Voting
19 is broken down by segment and each segment is
20 given two votes. If you look at the end user
21 segment in this example, in the "votes cast"
22 column there were three votes in favor and one
23 against. The net fraction gets a portion through
24 the two balanced votes that every segment gets.
25 It works out to be one point five in favor; one

1 point five against. These balance totals are used
2 to determine the outcome of the simple majority
3 vote, and again this is just in place to make sure
4 that every segment's equally represented.

5 A couple points to make are that each
6 company only gets one vote in each segment in
7 which they're represented. Meaning, if you have
8 five people from your company representing the
9 producer segment, let's say, only five of those
10 people are allowed to vote, or are participating,
11 only one of those people is allowed to vote.
12 However, if your company has interest as a
13 producer and as a pipeline, and you have two
14 people from your company representing those two
15 different functions, then you can vote twice, one
16 in each segment. Also from multiple quadrant
17 efforts, such as the e-forms type effort, each
18 quadrant shares an equal percentage of the vote.

19 So in the beginning of all of our
20 meetings we follow FERC's rules and orders and the
21 procedures that define our governance documents.
22 We really strive to reach consensus positions and
23 parliamentary issues normally don't come up, but
24 in case they do, we have this hierarchy of rules.

25 As I stated, ratification is required

1 before a standard can become a final action
2 included in publication. It's a thirty-day voting
3 period that requires a super majority vote. In my
4 time and days we haven't seen a standard fail once
5 it's been vetted through the other processes.

6 So that at a high level is kind of an
7 overview of our process. I know it's a lot to
8 cover in just a few minutes, but we do have a lot
9 of documentation on our website. Of course if you
10 have any questions you can always contact the
11 office.

12 So next I want to talk about the
13 E-Tariff effort that we undertook in 2007 and
14 2008. It's my understanding that the E-Forms
15 effort is very similar and that's why the
16 Commission contacted us and asked us to
17 participate.

18 So in July 2004 a NOFR was issued by
19 the Commission that proposed for party utilities
20 and gas and oil pipelines to file their tariffs
21 electronically through Commission-developed
22 software. In response to the comments on the NOFR
23 and the tests run on the software, the Commission
24 held a public meeting similar to this one to
25 discuss the possibility of developing a

1 standardized protocol and data format for the
2 electronic submission of tariffs rather than
3 pursuing the Commission-developed software. As a
4 result, NAESB formed the E-Tariff Subcommittee and
5 Technical Task Force and convened the
6 representatives of the gas, electric and oil
7 industries as well as the SIRIS (phon) companies
8 that support those industries.

9 Commission staff also prepared a work
10 paper for the first set of meetings that described
11 the basic field of the tariff database and served
12 as a starting point for discussions within NAESB.

13 The NAESB E-Tariff subcommittee began
14 in March after the initial meeting of the
15 Commission and held sixteen meetings over the
16 course of roughly a year to develop the standards
17 of supporting implementation. We have
18 participation from over a thousand individuals.
19 That was nearly sixty people per meeting. We had
20 the leadership from both the wholesale electric
21 quadrant, wholesale gas quadrant within NAESB as
22 well as the Association of Oil Pipelines.

23 The subcommittee turnaround standards
24 are from NAESB's supporting documentation within a
25 year, which in the standards world is pretty quick

1 for such a large effort.

2 The last meeting was held in January
3 and during the balancing procedures that I covered
4 earlier, the recommendation received unanimous
5 support with just a few extensions. It was posted
6 for a thirty-day formal comment period and
7 received nine comments in response.

8 Our executive committee, both the
9 wholesale electric and wholesale gas, met together
10 in February after the comment period. The meeting
11 was a joint meeting because it's a joint effort.
12 They considered the recommendation, made a few
13 changes to the modifications and voted to adopt
14 it.

15 The recommendation obtained both from
16 the wholesale electric quadrant executive
17 committee as well as the wholesale gas, because it
18 is joint and they both had to support it, it was
19 sent out for membership ratification and then it
20 was passed on April 4th and we filed the standards
21 with the Commission on April 15th.

22 As I noted before NAESB makes all their
23 work papers, agendas, meeting minutes, voting
24 records, all that available, and the reason we do
25 that is so that there's a robust record to the

1 Commission or other interested parties can look at
2 if they want to trace how it was developed or see
3 positions and understand the reason why it was
4 created the way it was.

5 So, after NAESB submitted the finalized
6 standard and report to the Commission on April
7 15th, the Commission acted very quickly, and on
8 April 17th they proposed a supplemental NOFR to
9 incorporate the E-Tariff standards.

10 The NOFR also provided resolution to
11 some of the issues that were identified in the
12 NAESB process and a final order was issued on
13 September 19th. They set an eighteen-month
14 implementation deadline with a staggered schedule,
15 and prior to the implementation date the
16 Commission created a testing site and held
17 technical conferences to continue the dialog with
18 the industry to make sure there was a smooth
19 transition.

20 So the finalized NAESB E-Tariff
21 standard is really just a few definitions and two
22 standards and then a technical implementation
23 document, and that document really defines the
24 requirements for the submission of E-Tariffs.

25 The standard itself just requires that

1 you comply with the implementation document and
2 either submit them in sheet-based, section-based
3 or whole-document format. This is a little
4 different than some of our other standard
5 development efforts. We particularly set pretty
6 high-level business practices and then get into
7 the more technical aspects, but this standard is
8 really technical from all the way through.

9 So on the next slide you can see that
10 the Technical Implementation Guide contains a
11 process flow diagram, the data and code value
12 dictionaries, and then the specification that
13 really defines the process for submitting
14 E-Tariffs and what that looks like. I know most
15 of the people in the room are probably employees
16 of companies that file tariffs, so you're familiar
17 with the process, but you may not know that NAESB
18 was the standard behind it.

19 So looking forward I'm going to talk a
20 little bit more about what we've done in response
21 to the April 16th order and what we may do in the
22 future should we pursue standards development.

23 In response to the order in this
24 technical conference, our board of directors has
25 already initiated action to support the request.

1 In the next few weeks our board of directors will
2 be considering an annual plan item for both our
3 wholesale gas and electric plans that will direct
4 the formation of a joint gas and electric
5 subcommittee. Outside of that you can see on the
6 slide we put together the annual plan item and
7 this kind of defines the scope of the project.
8 It's pretty broad. We drafted it that way so that
9 we can address anything that results from this
10 conference.

11 I'm assuming that the subcommittee will
12 work much like the E-Tariff Subcommittee and that
13 will report to both the electric and gas executive
14 subcommittees and we will have the ability to
15 create any work groups or task force that we may
16 need.

17 We reviewed this item with the board of
18 directors on June 1st in a working session, and
19 during that call we really didn't receive any
20 negative comments. We also discussed the need to
21 incorporate the oil pipeline community to make
22 sure that they receive the table in the standards
23 development so that anything we produce can
24 support their market if needed.

25 So, assuming we move forward at NAESB

1 with the annual plan items, the subcommittees
2 established, the group is going to have to decide
3 how to move forward structurally. The
4 subcommittee may choose to act as a single unit
5 throughout the process and address each of the
6 forms as a group, or it may decide to create
7 separate task forces and work groups to address
8 the forms individually. If that's the case, the
9 group's going to have to decide if we're going to
10 organize those groups by market or by form and how
11 the forms will be sequenced, in which order will
12 we take them.

13 Either way, I think there's some
14 commonalities between the forms, and at the very
15 beginning at least I think we'll work together as
16 a group, no matter what decision is made regarding
17 the organization and structure.

18 As far as a timeline for the project,
19 the board of directors has not set one within
20 NAESB, but we can respond if one is set by the
21 Commission.

22 As I noted, E-Tariff standard was
23 developed and delivered to the Commission in about
24 fifteen months, and I don't believe this effort
25 will be extremely lengthy either. We have a

1 procedural path at NAESB for us to move forward.
2 The form data gets electronically communicated.
3 It's not up for debate from what I understand from
4 the Commission. And FERC staff has already
5 prepared some work papers that would help the
6 subcommittee hit the ground running. I think once
7 we establish the subcommittee and hold a few
8 meetings we will have a better idea about a plan
9 and a timeline.

10 So participation. Again, all of our
11 meetings are completely open to anyone wishing to
12 participate, and if there is some sort of
13 financial strain on a nonmember, we could discuss
14 issuing a waiver. Again that's done on a
15 case-by-case basis.

16 I think we also have an advantage
17 because of our previous work with the Association
18 of Oil Pipelines on the E-Tariff project because
19 we have a crossover membership with the AOPL.

20 I have contacted Steve Kramer, Nicole
21 Gibbon with AOPL and we've started discussing
22 resolving issues that may come up. We just did
23 that recently and soon we will talk further, but
24 at least we established that relationship.

25 As I said, the first thing will

1 probably a planning session. It will take place
2 via a conference call or webcast. At NAESB we
3 typically try to hold as many meetings as possible
4 via conference call and webcast so we can save on
5 the cost to the organization as well as the
6 expense to the industry. So I think that's what
7 we'll do with this effort, unless face-to-face
8 meetings are required.

9 With that I'll be happy to answer any
10 questions about the process or the documentation
11 that we presented and I've included by contact
12 information on this last slide.

13 MR. HUDSON: Thanks, Jonathan.

14 Now we're going to just move into a
15 question and answer says. We're going to sit up
16 here at the front and pass the mic around, and
17 John Collins, a colleague from my division, will
18 take online questions and read them into the
19 record and we will answer them too.

20 So the three of us, and you, Mr. Glad,
21 will just move to the front.

22 MR. HUDSON: Any questions from the
23 audience? I think there were some questions.

24 QUESTIONER: My name is Steve Alflof
25 (phon). I'm with Enterprise Product Partners. I

1 also am a representative as the accounting
2 committee chair for AOPL.

3 Do I understand you correctly, from the
4 NAESB standpoint, that we're going to have a -- is
5 it going to go through the same voting process,
6 quadrant waiving and all that stuff. I'm familiar
7 from my gas background as well, that was going to
8 happen. I wasn't part of the E-Tariff process,
9 but I do have seventeen form 6's and one form 2,
10 so I know that this affects me a whole lot as part
11 of the process.

12 MR. BOOE: I think right now our
13 intention is, we have to stay within the bounds of
14 our process, and I think right now the intention
15 is to really follow what we did for E-Tariff, and
16 then we made some allowances for voting for AOPL.
17 In that process, I think we're going to do that
18 here. We want to make sure that everybody has an
19 equal voice. Like I said, transparency is really
20 our key and making sure that everybody's equally
21 represented.

22 So we'll work through that as we get
23 there, but I think we're going to kind of mirror
24 what we did for E-Tariff.

25 QUESTIONER: I'm Moses McCall,

1 principal software engineer at LawIQ.

2 I have two questions. The first
3 question is specifically for financial reporting,
4 will FERC be following the open source gas
5 standard of XML, and ST Limited?

6 And secondly, with regard to, you
7 know -- I see that for the e-libraries, you have
8 the computers, kind of PDF, but also as a
9 consideration for PPI from machine to machine for
10 data output? I just wanted to know about that as
11 well.

12 MR. THOMAS: We haven't decided on a
13 final standard yet. We will be looking at
14 existing standards at our URL. For instance a lot
15 of things are out there to see where the financial
16 reporting of the various instruments, and if there
17 is anything that works for us and for the
18 consumers, more information, for the filers.
19 Sure, we will be leveraging our existing standard
20 rather than building our own.

21 Regarding the machine to machine part,
22 as well, that design seems to be imminent.

23 QUESTIONER: Hi, I'm Carrie Alrey
24 (phon) with the National Gas Collect Association.

25 I'm a columnist so I don't understand

1 the computer lingo a little bit, but I know
2 currently with Visual Pro it's quite the work to
3 try to get the data into a format that's usable.

4 So my recommendation, I don't know if
5 XML is that for you guys to be -- for the user to
6 be able to query data right on the FERC website
7 and download it into an Excel format or some
8 format that's easily usable, you know, is
9 definitely a consideration.

10 I want to emphasize I know energy
11 information administration at the DOE has a very
12 good way of being able to query the information,
13 and they collect a lot of data, and be able to
14 download it into Excel in an instance after you've
15 picked whatever options you would like to do.

16 MR. THOMAS: Yes, our intent is to make
17 the data much more usable both for internal staff.
18 They see the same things that people on the
19 outside see regarding the data.

20 We definitely want to make it easier
21 to, you know, either by page within a form or
22 across a spectrum of filers. We're looking at how
23 can we do that. How can we make the data more
24 queryable and be able to download it for those who
25 want to use Excel or other tools.

1 So that's definitely a priority
2 requirement for us, so it's the usability for
3 those that consume that is the issue.

4 QUESTIONER: (Ms. Alrey) Right, because
5 right now I have to throw it into Access to be
6 able to then convert it. It's just a big --

7 MR. THOMAS: We have the same challenge
8 ourselves, so we're trying to get it so that the
9 data is more consumable.

10 MR. HUDSON: John, can we take a couple
11 of questions from the people online?

12 MR. COLLINS: Certainly.

13 So the first question is from Carl
14 Castleberry, and he says, "On the April 16th order
15 we state that we will not be providing software to
16 filers. How can the FERC assure that third-party
17 vendors will engage in the effort to provide
18 suitable front end interface software as a
19 reasonable price, especially considering that some
20 smaller pipeline companies have little or no IT
21 resources?"

22 MR. THOMAS: We can't make any such
23 guarantees that third-party software providers
24 will jump in and create a solution. This effort
25 in the end will yield a new set of instructions on

1 how information will be filed with the Commission.
2 So at this point we can't state that third-party
3 vendors -- we have no agreements with anybody to
4 make such software. All we can do is work on what
5 is an XML standard and what will be filed with the
6 Commission.

7 MR. HUDSON: We have another question.

8 QUESTIONER: I need to mention that
9 there will be a data dictionary coming on as part
10 of this process? Is that going to be issued with
11 the final rule, or what do you think?

12 MR. HUDSON: So there is a current data
13 dictionary for the Visual Fox Pro that is posted
14 online on the website right now. It's actually
15 the database, how we have it currently, according
16 to Visual Fox Pro.

17 We will be posting a more technical one
18 when we move it to the XML and that's what's going
19 to be developed through this process, with input
20 from all industry segments and vendors or anyone
21 to wants to take part what these fields mean, how
22 they should be defined, and what they're technical
23 specifications should be, if they're validated on
24 any formula or anything like that.

25 But yes, at that point that is the

1 final product along with the front-end interface
2 and everything.

3 QUESTIONER: Gary Kravis with Links
4 Technology Solutions. We're a software provider
5 in the regulatory compliance phase.

6 We'd like to know how we can get our
7 lands on a fully functioning Form 1, Form 2, Form
8 6 software with a test company where we can run
9 the full life cycles as soon as possible.

10 Is that something you can help us out
11 with?

12 MR. THOMAS: Are you talking about the
13 existing Form 1? That's on ferc.gov today, the
14 ferc.gov website. There are instructions on how
15 to download and file Form 1 and you can download
16 the whole Visual Fox Pro container and be able to
17 do that.

18 Does at that answer your question?

19 QUESTIONER: (Mr. Kravis) Right, we
20 have done that.

21 MR. THOMAS: Okay.

22 QUESTIONER: (Mr. Kravis) What we don't
23 have is a company I.D., a test company I.D. where
24 we can use in an interactive mode and get a sense
25 for the full life cycle of that process.

1 MR. THOMAS: That's one we don't have a
2 solution -- we don't create test pins to get to do
3 that. We can take that question and see if we can
4 get back at a later date for anybody that wants
5 to -- software vendors or others who don't
6 typically file, but you might want to try that,
7 just to understand the current process better.

8 MR. HUDSON: There is a question
9 (indicating).

10 QUESTIONER: My name is Matthew
11 Peterson, with the Regulatory Economics Group.
12 I'm also a software developer.

13 And I'm wondering in connection with
14 the data dictionary whether there is some need for
15 you know -- or is it a question I think from AOPL
16 today is in the NAESB process that that data that
17 they're sharing hammered out or is that a separate
18 process with FERC? Does all of this run through
19 NAESB?

20 MR. BOOE: It will, and in the E-Tariff
21 effort we did develop a day-to-day sharing through
22 NAESB. We used FERC work papers which they sent
23 to us, as a basis for that, but it still ran
24 through our entire process and ended up in a NAESB
25 day-to-day sharing.

1 QUESTIONER: (Mr. Peterson) All right,
2 so there is a single process. There is not a
3 NAESB process and a FERC process. It's a single
4 process?

5 MR. BOOE: Correct.

6 QUESTIONER: Hello, I'm Ryan Stanley
7 with Pacific Gas and Electric Company.

8 You guys mentioned that usually you
9 kind of still file with the old software during
10 the transition period.

11 Does that include after the new
12 standard comes out for old filings? I mean with
13 an unsupported software I guess I'm wondering how
14 this will work and have concern whether unlimited
15 filing will show up?

16 MR. THOMAS: Well, we haven't locked
17 down yet an answer to that question. What we
18 envisioned is probably once we have the new
19 standard out we will only accept any filings in
20 the new standards. If you want to refile older
21 filings, they would have to be adapted to the XML
22 standards for whatever required filing period.

23 Again that's not firm today, but that's
24 probably how it will work.

25 QUESTIONER: (Mr. Stanley) Okay, and a

1 follow-up question about populating databases.
2 Are you planning on helping to convert old data so
3 that the analysis that the staff and the industry
4 needs to do is available under the new database,
5 and will the old data eventually go away and not
6 be available for users?

7 MR. THOMAS: Initially the folks will
8 be able to get the filings in a new standard and
9 keep the old databases in their kind of as-is
10 state.

11 Probably a second effort as we get the
12 standard, we're kind of ready to go and ready to
13 go, have people file against it, we can look at
14 migrating the new data it into the new standard,
15 but that's not a direct part of this effort.

16 MR. HUDSON: I can say ideally, yes,
17 everything at some point will be in the same
18 database and queryable, but we haven't planned
19 that far out in the process to convert that.

20 As Gerry mentioned we're just looking
21 at getting rid of Visual Fox Pro, creating a new
22 way that people can submit to current technology.

23 QUESTIONER: Mary Brown from Open
24 Access Technology International.

25 I was wondering if the Commission has

1 considered the use of appropriate security
2 technology, such as PKI. I know NAESB has been an
3 advocate in the area and has developed standards
4 as those relate to authentication of use of assets
5 to prevent imposter filings as well as encryption
6 of data and transit?

7 MR. THOMAS: We don't consider all
8 appropriate federal security standards as we do
9 with older technology in house. More about the
10 specifics on how we're applying standards with the
11 kind of flesh-out over the life of this project.

12 But absolutely, you know, we're held by
13 the federal security standards. So it's law that
14 we have to do that. So, absolutely.

15 QUESTIONER: Pavel Storaf (phon),
16 senior software architect Public Technology
17 Solutions.

18 I was interested in how far can NAESB
19 handle the test process? My understanding is some
20 of those forms are huge, hundreds of pages. Is it
21 going to take fifteen hundred hours? How does
22 somebody test something like that, you know,
23 change XML or whatever?

24 MR. THOMAS: We will have a test
25 facility in the future someday that we will

1 eventually announce. The process will probably be
2 something like we would train folks on a new XSD
3 or a set of rules to apply the XML against. You
4 would either be able to download that XSD yourself
5 and test your filings against your XML, or, as we
6 have done in the past, we could set up a -- we
7 will probably for some period of time if not
8 indefinitely -- have a test site where you could
9 upload your file. We would parse against our XSD
10 set of rules and you would either get back an
11 acceptance, a test acceptance e-mail saying it
12 worked, or something else saying here's warnings
13 and errors that we encountered that you need to
14 comply with the XML.

15 QUESTIONER: (Mr. Storaf) Would we be
16 able to get access to sample data? Because I
17 figure fifteen hundred hours of test data could
18 be --

19 MR. THOMAS: It's possible. If that's
20 something that we find that comes out of this
21 process, if that's a needed component of this
22 exercise, I don't see why we would not be able to
23 do that.

24 QUESTIONER: (Mr. Storaf) Thank you.

25 QUESTIONER: (Mr. Aflof) I have a

1 technical question from my IT badge, but are you
2 planning on having separate XSD databases for Form
3 1 versus Form 2, versus Form 6? I mean, I do
4 Forms 2 and 6 and they're vastly different in the
5 statistics that are provided and information.

6 MR. THOMAS: Yes, we would probably
7 have to have either -- it would be easier I agree
8 if we had individual standards that kind of
9 separate out the commodities, the specific
10 differences between the forms.

11 The counter to that would be unless
12 it's more efficient to do one and somehow break
13 out the instructions for the differences in the
14 XML per, you know -- all in one form and do it
15 that way.

16 Probably in the visual forms, again,
17 once we start building it we'll have a better
18 idea.

19 QUESTIONER: (Mr. Aflof) Just like one
20 and two, they're vastly different.

21 QUESTIONER: This is Kate Daly with
22 INGA.

23 I just had a follow-up to the previous
24 question about validation and the testing process.
25 I know that FERC currently has an XML sheet

1 regarding validation on FERC's website that
2 companies can look at. Is FERC planning on
3 providing a similar validation check for companies
4 so that we can ensure a smooth filing process as
5 we go forward?

6 MR. HUDSON: Right, as soon as
7 everything is recommended and settled and we have
8 those documents, we'll put them in easy readable
9 forms online, a table, an Excel spreadsheet,
10 whatever, a Word document that actually describes
11 each field and what it's validated on, what
12 passes, what's a warning and what's an error.

13 That is not just to file back and say
14 you can't submit. But all that will be easily
15 readable for non-programmers and then of course
16 we'll have the programming document that will
17 technically describe how the validations work.

18 QUESTIONER: Mary Brown again from
19 OETI.

20 I had a question with regard to the
21 Commission's use of SQL and whether there has been
22 a consideration to move to a more open source, big
23 data as opposed to proprietary, SQL-based?

24 MR. THOMAS: Yes, so far we've pretty
25 much gone all in on SQL server. We're pretty much

1 Microsoft centered within our data center. There
2 is no consideration at this time. We are looking
3 at some of the big data solutions for those that
4 consume the data within FERC of the various kinds
5 of data.

6 So I don't want to say no, it's not
7 ever going to happen, but for right now I believe
8 we'll probably build it off of a Microsoft SQL
9 server solution. That's just the sort of
10 technology with EM today that we continue to
11 expand upon.

12 QUESTIONER: Moses McCall again.

13 What's the timeline designed for
14 implementation?

15 MR. THOMAS: We're not prepared yet to
16 give you that. There is a lot. There is the
17 technical components of this, any rulemaking that
18 would come out of the department office. I don't
19 think it's going to be part of this conference to
20 be able to announce that at this time.

21 MR. HUDSON: It all depends on how
22 honestly the input from industry in the process
23 before we can get a recommendation out of the
24 NAESB process. We have scheduled a long time for
25 this and we hope it doesn't need a long time.

1 So, it all depends on those working
2 groups that run before we can get an actual
3 recommendation.

4 MR. GLAD: Ultimately that decision is
5 up to the Commission and you will be informed as
6 to the process.

7 QUESTIONER: My name is Gill Rosado.
8 I'm from Con. Edison.

9 Just from a practical standpoint I just
10 want to confirm my understanding. You're not
11 expecting the end users to convert the old forms
12 into XML with a third-party utility tool, are you?

13 MR. THOMAS: No. Well, the final
14 outcome of this will be a new set of instructions
15 on how to file these forms with the Commission.
16 Rather than the current set of Visual Fox Pro
17 databases that we have today, the message today is
18 that there will be a future set of instructions.
19 It will be very different where we'll be requiring
20 those forms to be filed against an XML standard.

21 We're not weighing in at all regarding
22 third-party vendors. That has nothing to do with
23 what we're seeing today.

24 QUESTIONER: (Mr. Rosado) Well, just
25 thinking from a practical standpoint, you know,

1 when we file the information with the Visual Fox
2 Pro database, and I'm specifically talking about
3 Form 1, the annual and the quarterly filings,
4 you're saying that you'll be sending out a new set
5 of standards and new set of rules, but are you
6 putting the ownership or responsibility on the
7 utility to do the conversion?

8 MR. THOMAS: Well, we don't see it so
9 much as a conversion as just the data that you are
10 putting into those forms you can put it in an XML
11 form.

12 QUESTIONER: (Mr. Rosado) Just from
13 the -- I know it's kind of premature to ask
14 probably, but if the decision sending utilities,
15 let's say Excel templates and then will we be
16 responsible for converting them into XML?

17 MR. THOMAS: One of the original
18 questions was, I would say test or sample XML
19 files. So we perhaps will do that as a means for
20 people to kind of adopt something that exists,
21 that's known to work and that we've tested.

22 MR. GOLDENBERG: Just a clarification,
23 this process is designed to work much like
24 E-Tariff is today. There was an earlier question
25 about small pipelines. When we designed E-Tariff,

1 we had many of the vendors were in the room, they
2 helped design it. From my understanding we have a
3 lot of vendors who provide E-Tariff software. The
4 vision here is the competition will provide
5 whatever software solutions the filers are going
6 to need to be able to input their data into the
7 XML and then get it sent to us.

8 QUESTION: Leigh Spangler, Latitude
9 Technologies, one of those competitive software
10 providers...

11 You mentioned that many of the forms
12 are different, but many of the forms have similar
13 data in them. You mentioned there might be an
14 effort to try to put some commonality around that
15 data.

16 Is that process part of the NAESB
17 process or is that something FERC will do prior to
18 implementation?

19 MR. BOOE: I would assume that it would
20 begin, start out at the NAESB process, probably
21 during that first meeting take a look and see what
22 exactly is out there.

23 I know throughout our process we're
24 going to have FERC involved participating.
25 They're very heavily involved in E-Tariff effort,

1 so I think we need to think of it more as
2 collaboration.

3 But, yeah, I think that will happen
4 within NAESB and within the subcommittee meeting.

5 MR. HUDSON: And I know our IT
6 department is going to start doing that to lend
7 the data information that we gain to the NAESB
8 process.

9 So, yes, everybody will be working on
10 identifying the fields that are common across
11 forms, those that are different to lend itself to
12 the ongoing internal Commission effort to move
13 these forms from VFP to XML and share the data
14 with NAESB and industry so it will lend itself to
15 moving that process along at the same time.

16 Do we want to take some more questions
17 that are online?

18 MR. COLLINS: This question is from
19 Jason Johnson of American Electric Power. He
20 asks, "Will you be able to provide a list of
21 vendors that can or will be providing a tool for
22 us to use for Form 1 in 3Q reporting?"

23 MR. HUDSON: No, the Commission won't
24 get involved in recommending or even providing a
25 list of vendors that could do this. I believe at

1 least not in the marketplace.

2 MR. COLLINS: This question is from Sam
3 Q of the Iowa Utilities Board. Sam asks, "Do
4 state utilities boards or commissions need to file
5 the forms you're planning to refresh?"

6 MR. HUDSON: If you currently file
7 these forms, then you must continue to file these
8 forms is the answer to that question.

9 MR. COLLINS: No more.

10 MR. HUDSON: There's no more questions?

11 MR. COLLINS: They've all ready
12 covered.

13 MR. HUDSON: Okay, there's some more in
14 the audience.

15 QUESTIONER: Ryan Stanley with Pacific
16 Gas and Electric Company again.

17 I just wanted to follow up. It might
18 be a little early but you guys were talking about
19 footnotes and including that I guess in the
20 database, and when I think about the data
21 dictionary or taxonomy that would need to be
22 filled out, like how much variability, how much
23 prescription is there going to be versus the
24 ability to tag data that may or may not be
25 included in the data, or will you need to tag

1 those elements, too.

2 MR. THOMAS: We're taking a close look
3 at how it's done today. So we have footnotes that
4 come in all different shapes and sizes. We have
5 simple text entry. We have Word documents, Excel
6 spreadsheets, and they're available for pretty
7 much every entry field and every form at this
8 point.

9 We will incorporate into the new design
10 that capability that's part of the form filing
11 process. How that's going to transpire, you know,
12 how you'll tag that in XML will do that, we
13 haven't -- we've got to get through the process
14 and figure out how to do this efficiently.

15 QUESTIONER: Thank you.

16 MR. HUDSON: All right, if there's no
17 more questions, I think that concludes our
18 technical conference. I want to thank my
19 colleagues up here for their time and everybody
20 here in coming and everybody online.

21 Again, the docket's open 'till the end
22 of this month. If you want to provide comments or
23 questions there, and also there is
24 eforms.refresh@ferc.gov if you want to provide
25 more informal questions or information gathering

1 if you would like.

2 Thanks so much more coming and we are
3 adjourned.

4 (Whereupon the technical conference
5 concluded at 11:24 a.m.)

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