BEFORE THE

UNITED STATES OF AMERICA

FEDERAL ENERGY REGULATORY COMMISSION

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In the matter of: :

The EQR Software : Docket Number

Refresh Conference : RM12-3-000

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Commission Meeting Room 2C

Federal Energy Regulatory Commission

888 First Street, Northeast

Washington, D.C. 20426

Wednesday, July 11, 2012

The technical conference was convened, pursuant to notice, at 1:03 p.m.

STAFF ATTENDEES:

| | |
|---|---|
| Jerome Pederson, Presiding | Gerald Thomas |
| Tony Barracchini | Chris Folkes |
| Olufemi Aderounmu | Steven Reich |
| Mark Blazejowski | Deepak Ramlatchan |
| Connie Caldwell | Christina Switzer |

P R O C E E D I N G S

(1:03 p.m.)

MR. PEDERSON: Can we go ahead and get started, please? Connie, would you mind closing that back door?

Thank you all for coming. My name is Jerry Pederson. I am the Director of the Division of Energy Market Oversight, and we are here in the matter of the EQR Software Refresh Conference in RM12-3.

First I want to thank you all for coming in here today, and all the folks--I know we have a lot of folks watching via Internet. We do appreciate that. We also appreciate the questions that ya'll gave us in advance. We are going to be going through those questions as we go through our presentation.

Today we have set up an agenda in two sessions. One session will be talking about the Web Interface. We will then take a short break and then come back and talk a little bit about the XML.

One thing that I am going to ask, because we do have all your questions, at least the ones in advance--and we are going to try to get through those in the presentations--to hold your questions to the end of the presentation. So once we have talked about the Interface and we've talked about the XML, then we will open it up and allow additional questions.

Also, later on I will provide a website and a phone number that if you have follow-up questions, that we are going to make that available to you. And we do encourage you to send us your questions because we want to answer as much as we can.

Also, what we are having--we had some requests that this conference be transcribed, and so we are having it transcribed, as well. So that will be available as a reference for you going forward.

And so let me just take a second here, particularly for those that are not in the room, and just have us go around the table and introduce ourselves so you know who is here from Staff. We will start with Gerry.

MR. THOMAS: Gerry Thomas, System Engineering. We do the software creation, actually.

MR. BARRACCHINI: Tony Barracchini, System Engineering.

MR. FOLKES: Chris Folkes. I'm the Project Manager for the project.

MR. ADEROUNMU: Olufemi Aderounmu, software developer.

MR. REICH: Steve Reich, Division of Analytics and Surveillance.

MR. BLAZEJOWSKI: Mark Blazejowski, Division of Analytics and Surveillance.

MR. RAMLATCHAN: Deepak Ramlatchan, Market Oversight.

MS. CALDWELL: Connie Caldwell, Market Oversight.

MS. SWITZER: Christina Switzer, Office of General Counsel.

MR. PEDERSON: Okay. So what I am going to do is I am going to give an overview of the order, kind of walk you through it. I'll talk a little bit about the goals, the objectives, the problem we're trying to solve, and then I'm going to hand it over to Gerry Thomas and his team to walk you through a more detailed presentation.

(A Power Point presentation follows:)

There we go. All right, so the first place I would like to start is just reminding what the EQR is primarily designed to do. The EQR is designed to meet the Federal Power Act's requirement to have rates on file for public inspection in a convenient form for public inspection. That is the reason why we file these things.

As you all know, the EQR database currently uses Visual FoxPro. Visual FoxPro was designed for a limited amount of data. I think at one point I was told it was originally designed for about 250,000 lines of data, something along those lines.

It is currently coming in at around 14 million lines. Microsoft, who is the vendor of Visual FoxPro, has been critical in helping us keep the program, keeping the database running. I just want to pat Gerry Thomas and his folks on the back here. For the last couple of years they have done a Herculean effort to keep that database up and running and accessible to the public. They have leaned on Microsoft a lot, but they have kept it up and running.

There are disadvantages to Visual FoxPro, which is the basis of this database. Microsoft no longer sells it. They are not issuing new versions of the software. As of 2015, they are no longer going to support that software system.

And so we have got an issue that we need to deal with. As I mentioned earlier, the data tables, the sizes are limited under that program. The bottom line of what we have right now in terms of the EQR software application is it is ineffective and it is unsustainable.

So we have got a problem that we need to get fixed in fairly short order.

So--if I can figure out how to work this thing [the remote control]--okay. So from a staff standpoint, what we did was we stepped back and said, okay, how are we going to address this problem that we have?

And what we did is we set forth three goals that we wanted to accomplish with the Refresh Project.

The first was to minimize the impact on the industry. We understand that you have systems up and running. We understand there is a cost to providing this data, this EQR data. We get it. And so one of our goals was how can we fix the database problem we have, but at the same time minimize that impact on the industry?

Another one of our goals was to provide options to the filers, to choose what works best for you. And I think we have come up with a proposal that does exactly what. It provides you options where you can stick with basically what is going on today, currently today, and continue the status quo with some minimal changes; or, you can choose to go and move to a new filing format, a XML format. Whichever works for you. And you can go back and forth between the two. And Tony and his team is going to talk a little bit about that, more about that later on.

And the third goal of this project was to ensure that the EQR database was a reliable mechanism.

So now what I am going to do is walk you through the options that have been presented in the NOPR.

The first option is the Web Interface. In that, what we were thinking on that option was to build off the current automated systems that you already have out there. You are already collecting this data. You are filing this data. It is coming in in CSV files. It's coming in by, some companies put it in by hand.

And so the first, one of the options there would be to continue to do that approach. We would design an interface that resembles the look and feel of today's system. So you wouldn't have to retrain your people. When they pull up the screen, they're going to see the same things they see today.

Again, it will allow you to continue to--some of the smaller companies will put in their EQR data by hand. That option will still be there. Others want to upload the CSV files. That will be there as well.

There are two changes under that particular option. The first would be that you don't have to download the software that you do today--and that's the FoxPro. Right now the process is: When you come in, you've got to download the FoxPro software, and then go do your business. That would be eliminated. So you no longer have to do that.

Another change, which I think is probably a benefit to this upgrade, is there no longer will be a need to use Window-based computers. You could use any computer to upload your particular data.

We have heard from the outside that some of this, some from the outside that they like this particular upgrade in the sense that they become mobile. They're not tied to their particular work station. They can access it from anywhere that they're at.

The second option--and again I want to stress that these are options, and you can do one or the other; you can switch back between them. If you have multiple companies, some companies might choose option one. Other companies might go to XML. The intention is to give you that flexibility.

But the second option then would be XML-formatted files, to move to XML. The schema, we would develop the schema based on the current data requirements that are already defined in the Data Dictionary. You've been filing these for years. And we would also provide a sandbox for testing your system--testing your data. So you would have an opportunity to be able to go to that sandbox, test your data, make sure it's working right, make sure you're capturing it right before you file it. Again, we're going to get into a little more detail here in a minute.

There are a couple of changes that will occur really under both options. The first one would be the PIN. Right now, the way the system works is that a EQR filer has to, when you get your tariff you have to come in, request from staff a PIN, an identification number, to access the EQR system itself. That would go away. You would no longer need to do that particular step.

Instead of that step, what we would be using is the Company Registration System that is used under E-Tariffs. We're going to get into more detail on this, but let me give you kind of the bottom line on that:

You can still--under the Registration System, the only ones that get a company ID are those that have a tariff on file. But what we would work into the EQR filing system would allow those companies to designate agents or filers that they will designate to be able to make filings on behalf of the particular company.

They would have to E-Register. That's not a company ID. You'd have to E-Register to get on the Registration System at the front end of the door. Once you're in there, if it's a nonpublic utility, or an agent, you E-Register, you get in the front door. Then you'd come down to the EQR System. There would be a drop-down menu, and the company which you are filing for will have designated you as being able to file on their behalf. We will show you some screens on that later.

Error checks and accessibility: Under Option One, we did do some outreach and there were some questions and some concerns about being able to check information before it's filed with the Commission. And so what we want to do under this option is to provide the flexibility where you can come into the system. You can do your work there.

You can park it. You can leave, come back, do it in multiple sessions. You can run the error checks right there, all before filing, and do it right there.

The other option that we would provide, or the other flexibility, we would make those error checks available so that if you prefer to go in and grab the error checks and download them and use them on your home system, that would be available as well.

I talked a little bit about parking. Again, that allows you to put data in at different times, to work with your data, all before filing. So nothing gets filed until you choose to say I'm ready to go.

Historical EQR will continue to be accessible. So you will still be able to go back and get your old--the old EQR data, as we all will.

So that was kind of a general overview of this. I am going to hand this over to Gerry and his team to kind of walk you through some of the screen shots and drill down in a little more detail on this and hit some of the other questions that ya'll have sent forward.

I have on the screen right now an e-mail address, which is eqr@ferc.gov; and also a phone number for Jen Newman. If at the end of this conference, if you have questions, follow-up questions, and really any time, send it to us and we will try to get back to you as quickly as we can. We want to hear from you. We want to answer your questions.

So with that, let me hand it over to Gerry.

MR. THOMAS: Thanks, Gerry.

We've got quite a bit, I guess, as far as slides to go through in the two different parts that Mr. Pederson mentioned. We are going to cover kind of the replacement of the Visual FoxPro System and show what that's going to look like on the Web Interface.

I guess then we're going to have a short break, and then we will go into kind of a presentation on how the XML piece is going to work, and talk about that schema.

So I am just going to turn it over to our software development team and they're going to walk us through it. So, Chris.

(Another Point Power presentation follows:)

MR. FOLKES: Good afternoon. I'm Chris Folkes. I'm the Project Manager, as I said earlier, for the EQR effort. We have done a considerable amount of development in facilitating the changes for EQR.

We are going to be going over some of the differences between the existing EQR system and what's been developed in the new system, and basically going through this. This is a little difficult to read, what's up on the screen there, so you'll probably want to refer to your printouts.

In the Legacy System, we had a manual shared PIN number creation. That is being replaced with our E-Registration and Company Registration. In Company Registration you will be able to delegate who can file on your behalf.

This E-Registration and Company Registration is what we have done generically for the EQR tariff form and all forms going forward. The EQR and Legacy System, in the application we will be replacing, as was said earlier, that we will be decommissioning the FoxPro application. We will be substituting it with the Submission Web Application Client, and we will also be providing a Form Submission Service which will allow integrators or developers, and for third-party vendors to submit XML to our Forms Submission Web Services.

In the Legacy System, we had the required downloading installation of the Client. As you're aware, it required some FTP configuration and some firewall configurations. Those will no longer be necessary with the new system.

If you want to use the Web Application, you just come into the FERC Online, log in, and access EQR Online from anywhere.

In the Legacy System, the application runs unmanaged code on the Client desktop. That's something we want to move away from, and I think Microsoft does as well. We don't want to be distributing that type of application anymore.

Legacy System, there's a CSV import feature upon request. We've allowed that feature in the new Web Client. And we've also facilitated XML uploads int he Web Client, which I will get into later as well.

And, let's see, last but not least, we now have notifications in the new system. In the current system, there wasn't proper notifications as to the processing of your files. So we will now be facilitating that through a series of e-mails that anybody that's familiar with E-Tariff understand the number of e-mails you get when you submit your E-Tariff through the E-Filing system.

To continue, EQR--for the downloading, or the EQR Viewer in the Web Application, there will be a new EQR Viewer that is a little bit easier to navigate, and it is consolidated so you don't have to go back and forth trying to find your data and download.

The Legacy System allowed you to download FoxPro format, CSV, and an XML download. We'll be discontinuing the FoxPro download. And you will still be able to download CSVs and be provided the new XML download format.

In addition, for the new system we will have data services for integration via the EQR service.

Just to go over some of the things in the Legacy EQR Client Application, it required you to download, install, configure, designate respondent, and filing year, quarter, involved preparing the submission. You had the capability of copying from previous periods, importing data, amending EQR data, submitting--had to submit routine to submit the data to FERC, and the capability of submitting the refilings, and had archiving and the restoring archived data functionality.

In the Legacy System, the download install and configuration, the existing application required you to download and install. The application tasks include performing EQR installation and running through and doing the initial setup, downloading the EQR database, obtaining the PIN, Internet setup, configuring, and an additional network configuration to open up ports, et cetera.

In the new system, as was mentioned before, we're going to be using the Company Registration System. Company Registration is a Web application, which you can sign up on your company's behalf and manage your Company Registration through the FERC online portal.

In the new system, the EQR Web Client will have the capability of importing XML, or CSV. It will have the EQR Web Service, e-mail notifications, EQR Report Viewer, and I'll just go into the details of Company Registration.

Company Registration is going to allow you to--you would have to log into ferconline with your E-Registration account. And then to log into Company Registration you would create--after creating your Company Registration--most of you already have a Company Registration account because you're filing E-Tariffs. What you would want to do is log into that Company Registration, and the new version of Company Registration will allow you to select EQR for which you want to file under, and then you'll be approved through a process for filing EQRs.

And once that approval process occurs, you can delegate who can file on your behalf. And I've got some screen shots of this.

This is just a ferconline log-in screen. Company Registration log-in is here. Currently you have to put in your Company Registration ID and your password, log in, and when you get to the "Register Company," you would see the same familiar first screen.

But then as you go to the next screen, you will see--now this selection has already been approved, but what you'll have is you'll have the capability of clicking on the forms, or selecting the forms you want your company to be approved to file, and then based upon our staff approving you to file this type of form you will then be able to assign a representative who you can delegate to file on your behalf.

Okay? So you can manage--in the future you will be able to manage who can file on your behalf for the forms that we leverage this functionality for.

In EQR Web Client, we just have some bulletted items here of what we will be reviewing, and I'll just go through these particular screens.

This is the new log-in. Basically it's the ferconline log-in, but you'll just be redirected to EQR after accessing this portal. You'll still be verified as having a proper Registration account. What will happen here also is that it will check your delegation to ensure that you are actually delegated to file on a respondent's behalf.

And based upon who has assigned you--or who has delegated you to file on their behalf, you will be able to select a drop-down in lieu of having to enter a Company Registration ID and password, because we've leveraged the delegation by managing the Company Registration account.

So if you have been assigned--if you have been delegated to file on behalf of multiple respondents, you will see each and every one of those respondents in the drop-down. The other thing you will see in this dialogue is the filing periods.

So after selecting the respondent, you would want to select a filing period for which you want to file. If you already have data that you have already started entering for a given filing period, then you will be brought to the Modification Filing dialogue. And so you will have the means to modify that filing. If you want to blank it out because you made an error, or you wanted to start over, you can select the option to blank it out.

If you want to use the CSV Upload feature, you would select "Prefill CSV file" or "XML." Just another feature we added. If there is no data for that given period, you would be presented with the dialogue that's below, which is "New Filing." And the New Filing would just give you the option to start off with a blank filing for manual entry, or to prefill with the CSV or XML filing.

If we selected the Import from CSV filing for XML, you will then be prompted to either specify Import CSV File, or Import XML File. If you selected XML File, you'll get a single upload for the XML file. If you select CSV, then you'd be prompted to upload three files initially: the Identification CSV File, which contains the filers and the sellers, the respondents; the Contract CSV File; and then the Transactions CSV File.

Okay, I do want to mention here that if you have multiple transaction files and upload the files, you'll have the opportunity to upload subsequent transaction files, subsequent transaction CSV files.

If you click the next button in the Web Interface, you'll be presented with the option to add the respondent and identify the contacts for the respondents. You can add multiple contacts.

In slide 19 you will see the add screen for the respondent contact information. Upon clicking on "Save" they will be added to the grid above. The same type of controls were used to add the agent contact information. And in the agent contact you have a grid, and the individual information--the capability of specifying the name and address for the contact.

Moving right along into identifying the sellers: Sellers, buyers, and contracts have been consolidated onto a tab screen. So initially you would add all of the sellers, which you can see down below. If you click on "add" you can specify the detailed information for each seller, and add them to the grid.

Then you can move along to clicking the "buyers" tab and identify all the buyers, which is seen here with just a single buyer being added.

And this next screen shows the big picture of the screen where you can see that the sellers, buyers, and contracts are up in the upper left-hand corner. We've selected the "contracts" tab where we can identify the contract--each one of the contracts, and adding all of the contract data, all the data that pertains to the contracts.

And then moving right along to the "contract products," you can identify al the contract products by utilizing the dropdowns. There's been a significant amount of validation that's done in these screens to ensure proper formatting.

So after identifying the contract details and the contract products, we move on to "Transactions," in which you just identify the transactions. And then using the pulldowns for the product names, et cetera. So you can add each and every one of your transactions.

I just wanted to take a pause here for a second. If you had selected the XML upload for the CSV upload, all this data would already be prepopulated for you, if you were to leverage those two upload functionalities prior to coming into these screens.

If we were to come back later during another session, you can modify the data, make edits, or have other people participate in going in, other delegated registration accounts come in, make changes. And then, collecting all the data that you have prepared, you can submit the data.

When you submit the data, you'll see a confirmation screen. Soon after you submit and get the confirmation screen, you will get a receipt e-mail back from FERC much like you do through uploading an XML file for E-Tariff.

So I'll just go into all the notifications. You get the receipt, validation, acceptance, or rejection. The first e-mail you will get, as I said, is a receipt e-mail. Subsequent to the receipt e-mail, after we've processed your files, we'll identify any validation errors. Any errors or warnings that are found will be notified in the validation e-mail. We did a significant amount of checking through the Web Client Interface. This routine for the receipt, the validation, acceptance and/or rejection e-mails, are used not only for the Web Interface but for the Forms Submission Interface which we'll be discussing later on. So you'll be receiving the same type of e-mails.

Any of the error codes that are identified within this validation e-mail will be made available on the EQR portal so that it needs to be made reference either prior to making the submissions or for developer integration, or just for general knowledge for looking up why a particular error has occurred. That list will be made available.

Okay, I'm going to go ahead and talk about the new Web Viewer, and then we'll circle back after we get through the Web Viewer with any questions you may have.

The new Web Viewer reports and analysis has been consolidated onto tabs as well. I think you see in the upper left-hand corner you have "reporting" and you have "downloads". If I select the "summary reports," I can select the "report type" the "respondent" and then the "related sellers" for that respondent, and then select "download" to download the PDF summary report for that seller for that reporting period.

And you can see in the--I just gave an example of the sales by product. And then there's another example here for the filing inquiries, and where you can select the report type, the respondent, and again the relative sellers' reporting period. You can select a customer--or filer by customer, company; you can select your sorting; and then you can choose an option to export or show the data on the screen. If you choose the export feature, it will also allow you to export to Excel.

Okay, "Selective Filing Downloads" work pretty much the same way. You select the options. These are again just a couple of different screens of the application to show you how it would function. You would select--you can select one or more companies, and select a filing period.

The relative data for the downloads will be shown at the bottom in a grid for the companies in the filing periods that you've selected. If you notice, you can download the three CSV files for each company and each filing period, or you can download the XML file for each one of those companies for those filing periods you selected.

Upon clicking the links on the right-hand side, it would just allow you to download the ZIP file containing either the XML or the individual CSV files.

Okay, I just want to take a break here and--

MR. THOMAS: Chris, we were just talking, I think we're running a little ahead of schedule. So if it's okay with everybody, why don't we just finish up the slides and take the break then, and then we'll have everybody come back and the rest of the session will be Q&A.

MR. FOLKES: Okay, so we will get into the new Web Services.

We have three new Web Services that we are going to make available. One is for the FOL Registration. One is for the Forms Submission. And one is for EQR Data Services.

FOL Registration will facilitate interacting with our FOL Registration Services so you can obtain respondents by their CID and get other information that if you were to build a Web application or interact with our Web Services you would have the means to integrate with our Web Services and develop the applications and obtain the data that you need in order to facilitate creating your XML files.

The FOL Registration, I provided a slide in here that exposed some of the methods that we'll be making available.

Forms Submission Service is a generic service. We haven't limited this to EQR. We created a generic Forms Submission Service that are based upon the XML that's being submitted to this Forms Service. We can leverage this for basically the future.

Once we receive the XML file, we will run it through the appropriate routines to validate it for the relevant forms. And you can see there's only three methods in this Forms Submission Service to submit your XML.

The first one is Heartbeat, which is to make sure that the service is up and alive. You want to substantiate your service on your side. It's just a method for you to verify that you have connectivity and that our Submission Service is up and running.

The second one you will see there is a "Submit File". That's what you want to use to submit a production XML file.

And then the third, which I think we were referring to as like a "sandbox," but this will allow us to submit a test file. So if you call the "submit test", we will process your file and send you out the validation e-mails, but not send you an acceptance or a rejection e-mail. It is a method that a lot of people are familiar with with our E-Tariff sandbox in which they can submit their XML files and receive any errors or warnings that have occurred prior to bumping up against any deadlines, or just want to pretest the file prior to submitting it for production.

Now the new EQR services provided a listing of some of the methods that will be available. They not only--the intent on a lot of these methods are so that you can build our XML file utilizing the data that already exists in the FERC's EQR database that will allow not only for the use of creating subsequent submissions, but this could also be used for reporting purposes.

If you wanted to integrate it into Excel, you could integrate it into Excel for reporting. It shouldn't just be limited to making submissions. But obviously there's quite a few methods here that you could use to create your XML files for submission to the Forms Submission Service.

Okay, which brings us to the XML schema. We've developed an XML schema that not only provides the structure for the XML file to be submitted, but we've provided two XML schemas. One is for the structure, and one is for the data that can also be used for the validation.

Now if you are familiar with E-Tariff, we have multiple CSV files that are in the portal to be downloaded and used for data look-ups. This extra XML file contains all of that look-up data. So with a single validation on the XML schema, not only do you validate the structure but you validate that the data that you provided for those elements are contained in the data, the public data value XML schema.

MR. PEDERSON: Okay, at this point--thank you, Chris--let's take just a 10-minute break and let you gather your questions together. We will come back at about 5 of and then do a question and answer period.

When we come back, we have microphones on either side, and we have some chairs up here that are open. So if you have questions, come on forward. So 5 of 2:00. Thanks.

(A brief recess is taken.)

MR. PEDERSON: Can we go ahead and get started? I notice some of you have questions. Come on down. You can come on down and sit at the table, or go to the remote microphones.

MS. BOURQUE: Now, or after--

MR. PEDERSON: Questions now, Q&A now. We ended up, we were running a little bit ahead so that first presentation dealt with both the Web Interface and we also talked about the XML piece at the end.

Okay, so let me open the floor up. Who wants to speak up first? Questions? Barbara, how about you? And I will say this, that we are going to do the best we can to answer your questions today.  If we don't have the answer at the tip of our tongues, we will have to table it and get back to you.  But hopefully we can have more answers than not.

MR. BOURQUE:  I'm Barbara Bourque.  It's B-O-U-R-Q-U-E, and I'm with Energy Compliance Consulting.

Thanks for having this.  I did have some questions.  I had some specific questions, and I had some general questions, too.  When you were discussing, Chris, the page 35 of the slides, and page, I think it was 38, I was not following you.  So if you would talk a little bit more about what these services are, why they would be needed, and how they would be used, I would appreciate it.

MR. FOLKES:  Sure.  We've created the capability to integrate with the FERC without having a user interface. So if you wanted to build your own application and utilize these services, you can submit your XML, or create your XML and submit your XML through these methods.

The Forms Submission Service, as I said, has three methods:  Heartbeat, Submit File, and Submit Test.  So after you've created your XML file, you can use those to submit them to FERC.

MR. BOURQUE:  That's not the page I was--I'm looking at this, on page 35, the new FOL Registration Service.

MR. BARRACCHINI: Do we have a different number up here?

MR. BOURQUE: Oh, sorry.

MR. BARRACCHINI: The new FERC Online Registration Service?

MR. BOURQUE: Yes.

MR. BARRACCHINI: Oh, okay.

MR. FOLKES: Okay, the new FOL Registration Services will provide the means to collect enough information about any registration account to identify--if you look at the methods that are listed down in there, you will see that there are some methods to get the sellers by CID and some other methods that will be helpful in creating your XML files.

MR. BOURQUE: So who would use these? The filers?

MR. FOLKES: No.

MR. BOURQUE: Okay.

MR. FOLKES: The integrators, if they'd want to build an external system--

MR. BOURQUE: Okay--

MR. FOLKES: --you can utilize--

MR. BOURQUE: --which I do--

MR. FOLKES: --these services to create XML files for submission to the Forms Submission Service.

MR. BOURQUE: Okay, so these here would be just used by third-party integrators and not by individual filers?

MR. FOLKES: Correct.

MR. BOURQUE: Okay.

MR. FOLKES: And I think the intent is we were going to do the Web portion first, and then get into the XML Web services. But I think we had a little bit of extra time so we just decided to--

MR. BOURQUE: Mix and match?

MR. FOLKES: --roll all the way through the deck.

MR. BOURQUE: Okay. So on page--let me just look again at what 38 was--is that then a similar? Is this something that would be used by the integrators?

MR. FOLKES: Yes, that's correct.

MR. BOURQUE: Okay. Thank you.

You talked about the reports, which looked pretty similar to some of the reports that are available now. And one thing that I didn't see was what I think currently is the most often used by not only the public but also by FERC staff, the spreadsheet download application. Is that going away and replaced by the reports that you described? Or did I miss it?

MR. FOLKES: You do have the capability to download Excel spreadsheets through the downloads. The part that is--

MR. BOURQUE: By company?

MR. FOLKES: By company, yes.

MR. BOURQUE: And then the other reports that are currently batch-processed overnight by FERC, the ones you described today, would they be available in real-time? Or would they also be batch-processed?

MR. FOLKES: Our intent are to have them real-time.

MR. BOURQUE: Good!

MR. FOLKES: A lot of the troubles that we're having right now is that we send you an e-mail, and you have to wait until the next day, et cetera. However, we may be limiting the time frame to having a year's worth of data per respondent.

MR. BOURQUE: Okay. Sounds good.

MR. PEDERSON: Other questions?

MS. KEY: Hi. This is Jennifer Key from Steptoe and I'm going to ask probably a batch of questions, with K.C.'s help, that will go to some of the questions on the EEI list, trying to further pin down and understand how the system is similar to that today where you have one entity filing a single EQR on behalf of multiple sellers.

And I guess where we're sort of--you know, we understand that a company like a service company won't have a company ID. I mean, that's our basic understanding, that it will continue that service companies will not be allowed to have company IDs? Is that correct?

MR. FOLKES: By "a service company" you mean?

MS. KEY: A non-public utility.

MR. FOLKES: Correct.

MS. KEY: Okay--

MR. FOLKES: However--and I think some of the questions we've seen there are pertaining to delegation.

MS. KEY: Right.

MR. FOLKES: Now if a respondent has delegated an individual E-Registration account that happens to work for a service company, they can come in and they can file on their behalf.

MS. KEY: Right. And that's what we want to get to. What we're looking for is the ability to let's say 20 different companies has named--and I'm not sure whether you're naming a person as, an individual person versus another company as the agent--but whatever you're naming as the agent, you have say 20 entities with 20 different company IDs, and they've all said Mr. X, or company X can file an EQR for me.

Today, that Mr. X can file one EQR for all 20 companies, and we want to understand--we understand that's still going to be allowed--how that would work. Because when you--and maybe it's--I'm looking at the slide "Select Respondent and Filing Period". Where is it you can go in and sort of say: I'm now going to make one EQR filing, and it's going to be on behalf of the companies with the following 20 company IDs, and each obviously have 20 different passwords.

MR. FOLKES: Okay, the "Respondent" is a specific selection, but you're probably referring to the Sellers? Is that correct?

MS. KEY: Well we're wondering whether--like we see a pulldown menu like "Select Respondent and Filing Period".

MR. FOLKES: Which slide are you on?

MS. KEY: 15.

MR. FOLKES: 15?

MS. KEY: I guess the question is, are the Respondents only going to be entities with company IDs? Or could they just be anyone you want? I mean, can the Respondent be an agent like, you know, Duke Energy Business Services? Or, you know, is that a pulldown menu? And if it is a pulldown menu, what's it populated by?

MR. ADEROUNMU: We have four players involved in EQR filings. We have the Respondent, the Agent, the Seller, and the Buyer. The Respondent is basically the organization that is responsible for--or associated with the filing.

While other players have different roles in the filing.

So the Respondent could be an Agent, could be a Seller, but there could be different entities representing all four.

MS. KEY: Okay, so is it going to initially be populated with the current list of Respondents?

MR. ADEROUNMU: When you say "initially be populated"?

MS. KEY: Well it looks like a pulldown menu.

MR. FOLKES: The Respondent List, there would only be one "Respondent." Okay? That's responsible for the filing being made on behalf of this Respondent, okay? That pulldown list will be populated with those Respondents that have identified the agents, the person that's logging in with the Registration account to do business on their behalf. Okay?

Now that is not limited to who's identified for the Sellers. The Sellers can be added in the other screens at will, as long as they have a CID.

MR. HAIRSTON: I'll build on what Jennifer just said. K.C. Hairston from the Law Firm of Balch & Bingham. I have some clients that have the service company setup that Jennifer just went through, and so under the rules right now if a service company is selling power for more than one entity, then the seller is the service company. And so basically, so say you have a service company and they are agent for Company A and Company B, how are we going to do that? Because at some point the service company is going to have to be the Respondent so that they can have Company A and Company B as Sellers in their EQR. Or else you're going to be duplicating power sale transactions because you're going to have to report them in Companies A, Z, Q, R, and then in Company B, Z, Q, R.

So it's kind of a registration question. Steve, am I--

(Laughter.)

MR. HAIRSTON: So right now, I guess one thing I'll say is right now you'll allow the service company to come in. And when you look at the dropdown of respondents you'll see the service company there. So I guess is the intent to change that? Or is that going to be preserved under the new system?

MR. ADEROUNMU: It is going to be preserved.

MR. HAIRSTON: Okay. Thank you.

MS. KEY: So a related question--

MR. REICH: I think as a clarification, so for example as I understand it--and correct me if I'm mistaken--Southern Company Services and Georgia Power and Alabama Power, et cetera, are going to theoretically go to their FERC Registration and say K.C. Hairston is authorized to file our EQR? So that when you go to your EQR--when you go to log on to file, you log in under K.C. Hairston, and you get to that box, and you pull down that box, and under that box is all the various companies. And so you would be filing for those companies as you file now. You know, the Southern Company Services sales under Southern Company Services, Alabama Power Services under Alabama Power Sales under Alabama Power, et cetera, and you'd have all the ones available to you because they have authorized you under the legitimate means of the existing company registration system? Is that an accurate--

MR. FOLKES: Yes.

MS. KEY: And what we're asking is we want to make sure you can pick all of those companies at once. You don't have to pick one company.

MR. PEDERSON: So is your question, can you file for all five at one time, as opposed to having to file five separate EQRs?

MS. KEY: Right. That's what we do today, is you file one, and some people do 20 or 30 companies they're filing on behalf of.

MR. BOURQUE: Are you splitting transactions between two companies?

MS. KEY: We'll get to that later.

MR. FOLKES: Okay, I think there might be a little bit of confusion as to the scenario. We might be best off tabling this one for future discussion as to how you're using the existing application.

This system was to use one respondent. You can use multiple--and identify multiple sellers.

MS. KEY: Right. But you just said a respondent doesn't have to be--if a respondent doesn't have to be a company, if a respondent could be just--today a respondent doesn't have to be a legal entity, even. You know, it could be a service company.

MR. REICH: Can I ask one follow-up question that might--and not to get a conclusion, but to kind of get information, oddly enough. When you, in your case for example, K.C., or in your case, Jennifer, when you're filing for more than one company, do you upload the data--do you get that data from the multiple companies? And I know which companies you file for, but so for like Alabama Power, and Georgia Power, do you get that data separately for each company and upload them into the same--you know, into the same--you upload them--do you upload them then into the same software EQR package? So that it all files at once, but you essentially uploaded them separately?

MR. HAIRSTON: In Southern's case we do. However, some of their contracts are done as Southern Company Services as agent for different operating companies.

So in those cases, those transactions are reported as Southern Company Services transactions.

MR. REICH: Right. But the question I'm asking is do you--when you upload everything into the VFP software right now, is everything uploaded at once? Or is it uploaded by company by company?

MR. HAIRSTON: It's all loaded by one person collectively at one time.

MR. REICH: In separate files? In separate files, or in one file?

MR. HAIRSTON: Different. It depends.

MS. KEY: For Duke, I mean, their expanse is one. They might have, you know, for example under one of their EQRs that filed by the service company, there are three different operating companies and they just add--the same individual just adds contracts as they come, and they download the prior quarter. But it's not like they're getting a file from Duke Indiana and getting a file from Duke Ohio. There's one person who does all the transmission contracts for all three companies, and that person is the one entering all the EQR information. But information isn't coming by separate companies because that one person is responsible for that.

MR. REICH: Thanks for the clarification.

MR. HAIRSTON: And so we'll follow up. We're going to table this and follow up afterwards, but it sounds like we're going to continue to be able to do whatever we're doing today?

MR. FOLKES: You can. And it may be that we're confusing Respondents and Agents in what we're talking about. You can identify one Respondent, multiple Agents, multiple Sellers.

MS. KEY: Right. I think it sounds like as long as the Respondent can be sort of any, you know, whatever you want to call the "Respondent" you call it, and that just means you're bundling up a group of sellers for that respondent? Today there's a lot of flexibility. You can bundle, certainly today some Duke Ohio transactions are filed by one person under the service company. Another is filed under a different respondent that's called, you know, the Duke Midwest unregulated companies, which of course isn't a real entity but there's just a variety of respondents that are used to bundle up. But the same contracts may be in two separate EQR databases for the same seller today?

MR. FOLKES: Correct. And in this case the respondent would be responsible for the actual submission, multiple agents, and then the sellers that are identified would all be required to have a tariff, or should have a tariff on file.

MS. KEY: And one more related question and then I think I'm done. Also then it sounds like it is fine for one company to go in and file two different EQRs in a given quarter? For example, one company the respondent might be Duke Carolina's transmission, and then Duke Carolina's marketing, and each of those two different people from Duke Carolinas can go in and one can file for the respondent transmission and one can file for the respondent marketing?

MR. FOLKES: If you can file it that way today, you can file it that way in the new system.

MR. HAIRSTON: And just to follow up, you said the seller has to be an entity that has a tariff on file. But the one footnote to that is that the current rules allow you to have the seller be the agent if the agent is, you know, selling on behalf of two or more entities. So in that case perhaps the seller would be a nonutility that does not have a tariff on file with FERC.

MR. FOLKES: Can you send that one along in an e-mail?

MR. HAIRSTON: Yes, I'll send it to you.

MR. PEDERSON: All right. Thank you. Other questions? Yes?

MR. KLEIN: Yes, Dan Klein from Alston & Bird. I've got a batch of questions, and I hope you'll bear with me because I'm relaying some of them via e-mail from the

California ISO.

First concerning the Company Registration and the Delegate E-Registration accounts system. Do I gather that you would use the same Company Registration ID as is currently used for E-Tariff? You wouldn't have an E-Tariff ID and an EQR ID? It would be the same ID for both?

MR. FOLKES: Correct.

MR. KLEIN: And so when you're delegating E-Registration accounts to do the filings, only accounts which have been entered this way can do filings? Filings from someone who hasn't been delegated the authority in the Company Registration process, a filing from them will not be acceptable?

MR. FOLKES: Correct. There will not be the capability of entering the CID and password during the filing process. The individual FERC-online user that has the registration account will log in and then select the respondents that it has delegated to file on their behalf.

MS. KEY: Could I just interrupt, because you indicated that the delegation process is through the company ID, but here we're talking about the respondent delegating. So sorry to interrupt, Dan, but I'm just a little confused because if--you know, where does the delegation occur? The company ID, or how do you match that to the respondent?

MR. FOLKES: The management of the Company

Registration. So in this case, only the owner of the Company Registration ID and password has the authority to go in and manage the Company Registration, and then select existing E-Registrations to delegate to file on their behalf. That only happens during the management of the Company Registration.

The assignment, or the selection of the respondent is up to the filer to, when they go in and log into EQR, they will just automatically see a listing of those respondents that have allowed them to file on their behalf. Is that clear?

MS. KEY: I guess it sounds like when you're in the Company Registration and you have to delegate who can file on behalf of respondents not on behalf of--because what I'm not--there seems to be a disconnect. You're saying, okay, companies A, B, and C say Mr. X can all file on my behalf; but company A, B, and C all are bundled up on their respondent D. So how do you know that Mr. X can file for respondent D? If all you know is that Mr. X can file for companies A, B, and C, how do you then know once A,B,C are bundled to respondent D, that Mr. X can file for D?

MR. REICH: And correct me if I'm mistaken here, okay so the company registration is associated with the tariff. The EQR filing is associated with the tariff. And so on the tariff level, on the company tariff level, the company that has the tariff designates who can file for that company.

So when you sign on, you get the list of all the Duke Companies that you are able to file for.

MR. FOLKES: Actually, that may be--that may be the case, but it's a little different. The E-Tariff is associated to the seller's company registration ID, not the respondent. So the respondent company registration ID, whoever is going to file on behalf of those sellers, is the one who has the delegation who can file on behalf of the responding company.

MR. ADEROUNMU: In your scenario, D should be the one delegating--

MS. KEY: D can't delegate because D can't have a company ID. It's illegal for D to have a company ID. D is a service company. So D can't have a company ID, but it's the respondent. So do you see where the disconnect is? How do you get there?

MR. FOLKES: I think we're back to providing the explanation within the same e-mail that's already been requested.

(Laughter.)

MR. PEDERSON: Okay, let's go back--

MR. KLEIN: So my questions I think are a little simpler than Jennifer's because we don't get into the whole respondent issue. I'm still focusing on the mechanics of the delegation process, which is done through--I understand, through the Company Registration.

So--and if you're not a Registration account that is listed as a delegated account under the Company Registration, you can't make filings for that company? Is that right?

MR. FOLKES: Correct.

MR. KLEIN: Is there a limit on the number of accounts you can delegate?

MR. FOLKES: No limit.

MR. KLEIN: Okay. So basically we just have to--and E-Tariff is also going to come under this restriction? Is that correct, which it doesn't now?

MR. FOLKES: In the future we will be reviewing that as a possibility.

MR. KLEIN: Well I mean just--

MR. PEDERSON: If I understand the question, that's not part of this proceeding.

MR. KLEIN: Okay, I mean I'm just looking at the slide here and it's, you know, under Delegate E-Registration accounts, it's got a check box for E-Tariff, a check box for EQR, representatives assigned E-Tariff EQR, but E-Tariff is not going to be rolled into this process at this point?

MR. FOLKES: We're not--I don't think we're going to discuss that E-Tariff in this forum today, but the intent is to make it available for all future forms.

MR. KLEIN: Okay. So in the EQR context, we can designate--we can register as many delegated accounts as we want, but we've got to make sure we do that in advance of the person doing the filing. So that if we have two people delegated to do the filing and they're both on vacation, the third person is not going to able to just sit down. We're going to have to go into the Company Registration and add them, and that process could take a day?

MR. FOLKES: That's correct. And one of the problems we have with the existing E-Tariff is our Help Desk gets questions about resetting passwords because somebody happens to be on vacation and they can't make their E-Tariff filing because they're relying on the company with the CID and password and that individual happens to have it. So in the process of delegation, you can assign multiple accounts and the individual will be responsible for their own credentials.

MR. KLEIN: Okay, I have a very specific question about slide 23 here and this little "Is Affiliate" box. That's a check box, then?

MR. FOLKES: That shouldn't be on this particular screen.

MR. KLEIN: Okay, so it's not relevant to this?

MR. FOLKES: Correct.

MR. KLEIN: Okay. And my next question, this is on behalf of the California ISO, and I'm not very familiar with the mechanics of EQR submissions so bear with me here, but the question is:

Previously we've submitted our EQR filings by manually entering the data into the contract details and contract products tabs. And the question is: Is the CSV or XML method suggested going forward if currently we pull our data for the filing from an Excel spreadsheet or an Access Database tab? Is there a sense of which format would dovetail better?

MR. FOLKES: I think the XML would be best, the most flexible going forward in the future, but we will allow for the CSVs to be imported.

MR. REICH: But also to clarify, if they are hand-entering now they can continue to hand-enter in the future?

MR. FOLKES: Correct.

MR. KLEIN: Thank you. And finally, obviously precision is not possible but can you give a ballpark sense of the likely schedule going forward with the NOPR and the implementation and so forth?

MR. PEDERSON: Well the Commission in the NOPR proposed an effective date of about a year from now. I think it was the third quarter of 2013. So that is the proposal on the table.

Clearly we have a lot of work to do. We want to hear from the comments. We are still in the comment period, but that is the proposal out there. So it's about a year from now.

MR. KLEIN: Understanding this is kind of a speculative question, is it likely that there would be some kind of phase-in of the implementation analogous to what there was with E-Tariff? Or is it more likely that there will be a single date certain?

MR. PEDERSON: In terms of phase-in in EQR, how would that work? I'm not sure I quite get the question.

MR. KLEIN: In other words, might there be an overlapping period, you know, a quarter or two during which the previous system could be used, or the new system, or would it just be a switch-over to the new system?

MR. PEDERSON: That wasn't proposed as something that we can think about. I think the intent here was that we provided the two options. We provided a first option that is very close to, and almost mimics the current system today. So we weren't thinking in terms of a phase-in because of that particular feature. Certainly if it comes in on comments, and you have thrown it out, we can think about it, but I don't know how--we need to think that one through. Because as I say, the option one is really what you have today.

MR. KLEIN: So there's a pretty minimal adaptation on the front end in terms of the folks doing the entry?

MR. PEDERSON: We think so. But that's why we're asking for these comments.

MR. BOURQUE: Can I jump on that question?

MR. PEDERSON: Yes, Barbara.

MR. BOURQUE: Because that was--Barbara Bourque again--one of the questions that I believe was submitted by EEI, about having things run in parallel. And the one potential difference, and maybe we will see that here during the demos, is the timing of error messages. Which when you put your data into--import your data into the software currently, you immediately know if it doesn't work. And with the process that you've described, all of these, once you get done with your data there's an e-mail coming back and forth. And I think the concern, particularly for large filers, is is there going to be a large time difference? And how are those errors going to be reported back to you? Because normally the filing of data and the uploading of data is a very interactive process and, shockingly, it doesn't go perfectly the first time every time.

MR. FOLKES: True.

MR. BOURQUE: And so I think there's that question. So to the extent that the data fields aren't changed, if the current software was run in parallel with the Web Application and there was some sort of timing difference and problem with the errors, at that point people would know that, hey, we better switch to the XML because this isn't working for us.

MR. PEDERSON: If I understand the question, you are talking about we send out an e-mail within a few days saying that there were problems? Is that the--

MR. BOURQUE: No, you immediately--when you try to import the file now, sometimes it won't even allow you to import. Sometimes it will allow you to import it, but it will say there were X number of errors found and here they are. And it's instantaneous.

If you're doing this over a Web process, obviously it's not going to be instantaneous. And so it comes in, and, you know, even now you get a message back when you submit your filing to FERC that, yeah, it's been sent. And then you get an e-mail, usually the next morning, it's been processed.

If there's that kind of processing time, if every time you upload something you have to wait until the whole thing gets processed, and maybe the next day you get an error message, it could take months to, you know, create a filing if you have half a million lines of data.

MR. FOLKES: The CSV import functionality and the XML import functionality are both integrated into the application. So on screen you can upload those files, and then you will see your data throughout the rest of the screens.

So if you get a seller, a buyer contract details, it will all be there. What we'll do is we'll try to leverage on the constraints of the Web Application. So if there were violations, it would be showing them on the screen prior to even submitting the file to FERC.

So the portion about validation on the import will be done in the Web Interface.

MR. BOURQUE: And would you be able to down--when you say it will show up on screen, is there going to be a report file? Or is it just going to be that the erroneous data is highlighted? I mean, how would that work?

MR. FOLKES: For example if you imported erroneous transactions--well, first of all, if the transaction data was in an inappropriate format, it wouldn't even allow you to upload the file right there on the Web Interface. But if it was, say you had like a data overrun because the numeric field was just way out of range, then we would basically show that on-screen as an exception for that particular field for that transaction.

MR. BOURQUE: So would there be a blank screen saying this is an error, this is an error, this is an error? Or say my client had 500,000 rows of data, they'd have to scroll through 500,000 rows to see what the errors were and they'd be highlighted?

MR. FOLKES: If the data didn't follow the constraints of the upload, it would be kicked out upon the upload. However, if you wanted--

MR. BOURQUE: And then how would they know what the problem was if it got kicked out upon upload? How would that be communicated to them what the problem was so they could fix it and try to upload again?

MR. FOLKES: A summary of error information could probably be provided at the bottom of the load transaction screen.

MR. BOURQUE: And would you be able to download that?

MR. FOLKES: Well, no. I mean, on-screen--when you do the CSV upload, you can go in through all your transactions and modify the data on-screen prior to official submission. That's just an intermediary step in which you can modify the data.

So if you--if we showed up in a summary at the bottom of the screen saying there was an error on the 99,000th transaction, then you could navigate to that transaction, make the correction, and then submit your file.

MR. HUNT: Could I ask a question?

MR. PEDERSON: Would you identify yourself, please?

MR. HUNT: I'm Olin Hunt. I'm here for Pacific Gas & Electric Company. I think my mike's on. This is related to what Barbara was talking about.

We, for our quarterly reports, we end up uploading like over a million lines of data. And so one of the things we were looking at with this new Web Solution was how was this going to be different? And how was the system going to be streamlined to facilitate us uploading these files?

One of the things that we have that we experience when we do this, and when we hit the validation of errors is that when we do an upload, I assume there's a validation routine going on there during the upload, and there seems to be another system validation later on before we actually submit the files to FERC. And so at both of those junctures we can get error messages.

Right now, on the uploads when we do do a validation, get validation errors, we get the information back to us in the form of a PDF file, or a TIF file, or whatever. But anyway, it's a summary of like what's going on. So if there were a lot of errors, if we were uploading a million lines, or whatever, and there were a lot of errors there, then we would have basically a half a million pages worth of PDF error stuff.

So one of the things that I do know from E-Tariff, my experience with E-Tariff, is that the Commission maintains error code tables. And those error codes are given back to us if there are some problems from the system, if there are problems with the filing, with the XML structure and stuff.

The report that comes back from the Web-based program, is that going to be along those same lines? Because right now that would be actually pretty cumbersome in terms of us going through and trying to find--I understand what you were saying about, well, it says, oh, here on line 6,000 there's an error. This is the error. Go to this contract, go to this entry, and then fix that.

So that part I understand. That part is good. I'm glad we have that. But I'm looking at just, well, it really takes some time to actually navigate through that to get to that. So I don't know if there's some way that you folks could give us back that report so that we could actually make those changes.

And the other thing that related to this, too, was the one thing we can't do with the system as it is right now is we can't make batch changes. We can't necessarily--

we have to go to each line and make those changes as we go, rather than to be able to go this line, this line, go down this line, this line, select these, and just show me these, and let me go in and do this. Or if I have to change a value across several rows, let me as a user be able to do that thataway.

Because otherwise, with a small number of rows of data then that's not a problem, but if you have a lot then that's going to really be--that ends up being kind of arduous.

I have some other questions, too, but I would like if you could answer that one because it's important to us.

MR. FOLKES: Sure. The error codes will be posted to the portal much like we do with E-Tariff. And the validation e-mail will contain the errors that occurred when trying to process the filing. And during the development, we did run across where we'd try to upload 100,000 records and something was wrong with the data format of one of the columns, and we had a e-mail that was rather lengthy.

So what we did to help consolidate that is to just say if there were greater than 10 of those types of errors, to just summarize the error and make it more of a global type of instance that 100,000 of these errors were found and reference the error code.

MR. REICH: And, Chris, if that were the case, theoretically--would they be able to clear out what they sent, make the change at home, and then re-upload the file?

MR. FOLKES: They wouldn't--at that point they wouldn't have to because we would clear it out, or allow them to modify the data within the application. They could go back and--one of the benefits, I don't know if I pointed it out during the Web Application review, was that you don't have to re-file the whole submission.

So in the existing system you have to re-file for the whole filing period. Now if you have a change to make, you can actually go in and make that single modification either in the Web Interface, or in the XML submission, you can send in a very small correction file. If it was not necessarily a validation error but it was an error with misrepresented data, et cetera, then you could actually make that modification and send in just a very relatively small snippet of XML.

MR. HUNT: And something related to that also is the idea that--because I learned this the hard way with E-Tariff--when the validation routines were run on E-Tariff, we made our submission and it's 15 minutes to deadline, and then, I'm sorry, it didn't work, and then here's what's wrong. It might be a couple of errors. Go back in. Fix those up. They're done. And then submit it again. And then, oh, here's some more validation errors.

We're going to be seeing that again with the EQRs? Is that correct?

MR. FOLKES: Yes, the same type of thing. So what we've done to facilitate that is, you can see in the Web Service submission or the Form Submission, we have the Test Method. Our Web Application actually is built on the XML Web Services.

So we would have the option to test, so you can prevalidate your filing prior to the deadline. So if you wanted to do incremental changes, let's say you had multiple people working on the filing. And after each person works on the filing, maybe they want to test prior to moving it on to the next person, they could do that.

MR. HUNT: Is this going to--how is this going to interface with deadline? In other words, we're not--the submittal is not filed until it's accepted and filed. And so we're looking at we need to correct all of our validation errors before the filing is accepted, and that we made the deadline or we did not make the deadline. Because you were talking about, well, okay, validation errors, this subset, just refile this to correct these. But this is theoretically within deadline time.

MR. FOLKES: Right. The suggestion there is to validate as much data as you can. And if you're waiting for a few extra updates, then you can do your final submission upon collecting that additional data.

MR. HUNT: Okay. And finally--and PG&E contributed to some of the questions that EEI submitted, too, so I hope those are still sort of on the table someplace, but do you have a feeling that this kind of knowing that we have to upload this vast amount of data, it takes a long time. I mean, I go out and--I press a button, and then I go out and have some coffee, and then a do-nut, and then read a magazine, and then come back and it's still uploading.

So is the Web-based system, is that going to be--do you think that's going to work with a little more alacrity and be a little bit faster in pulling this stuff in?

MR. FOLKES: Yes. The XML and the Web Services are going to--should be better than any Web Application we could build on our side, first of all. But the Web Application will allow for you to submit the filing, and we will be responding with an e-mail so you don't have to sit there and wait for it to come back on the screen.

The confirmation page will be presented. The receipt e-mail will be sent. The file will be sent through the validation routine, and the validation e-mail. Hopefully it will be sent with zero errors, with a subsequent either acceptance if there's no errors, or a rejection e-mail if there were errors.

MR. HUNT: Thank you.

MS. KEY: This is Jennifer again. This is more of a comment than a question, and I know you are not going to be able to answer the question, and I don't think we can stress the importance enough of getting the two pending EQR NOPRs, getting the Data Dictionary set before we go about, you know, building XMLs. So can you give us any hint that maybe they're going to be out? Or are you going to wait and issue all the EQR final rules at the same time? I mean, we really would like--the other NOPR has been pending a long time.

MR. PEDERSON: Yeah, we can't--we're prohibited to talk about what the Commission may do, or when they'll do it. But I will say this. The way we're viewing this is, this proceeding, the one we're in and talking about today, is about updating the EQR software, and addressing the problem I laid out at the start of this conference.

And so we want to move forward with that. To the extent the Commission makes changes to the EQR, that can happen. It can happen over time, and we'll deal with that when it occurs. But as of right now, what we're doing is moving forward on the current existing requirements and moving forward on that.

Yes?

MS. BAGOT: Hi. This is Nancy Bagot, B-A-G-O-T, from the Electric Power Supply Association. I just wanted to support what Jennifer just said. And I realize that you're here on one specific issue. But as a comment, knowing that there are a couple NOPRs out there that would require changes, just how important it is for company resources in order to develop their software changes and all of their internal processes. I just wanted to leave with the comment that if they could sort of be basketed together, that would be a huge help and something we've gotten a lot of questions about.

MR. PEDERSON: Well let me ask a question back, because there are a couple of other proceedings out there, as you've noted, but isn't providing the option, the first option that we have out there, which is status quo, we're going to fix the database that's falling apart and provide you the option for the status quo, doesn't that take care of the--doesn't that cover the immediate concern?

MS. BAGOT: I can't answer because luckily I don't file these, but several companies have mentioned it. And it may be that there's just an assumption that there are going to be changes in certain resource requirements even though there's a status quo. And honestly, something that could be helpful is that if this is aligned with some of the changes, you might see that that encourages folks to move to XML, which sounds to me as if that's really the preferred platform. So, you know, if it's all done together, this might be the perfect opportunity for a company to say, okay, we're going to go in and make the full switchover to XML since we need to incorporate these new data field requirements because of the new rules, which there will be at that time.

MS. KEY: I was going to say the same thing. I think it's really for the benefit of the third parties out there developing software. I think, like I said, one of the NOPRs has been pending for so long, I think over a year, that they need to make a decision and then the XML that you all need to put out and that they need to develop software around, you know, sure there will be rehearings, but at the best you're going to get out of a rehearing a minor tweak, you know, that's just been pending so long that they might as well be building software based on the final rule.

MR. PEDERSON: Others? Barbara?

MR. BOURQUE: One comment I would make, I think it would depend, in response to your question of how that current application works. So if it works exactly like the current software and the error processing and all that was identical, then I think that wouldn't be a problem.

But if users find that it's not the same, and that there's timing issues, then they might have to move to it, so then it would be a two-step process.

MR. PEDERSON: Thank you. Question?

MS. SHALAMIAN: Hi. I'm Sarah Shalamian from Wright & Talisman, and I just had a question--I have a few questions, first on the company registration for the e-mail validations. Are those going to be going to the individual that files? Or to the e-mail address provided for the Company ID? Because in this case my question is that sometimes people filing for E-Tariff are different from the EQR filers.

MR. FOLKES: The notifications will go not only to the person that logged in to make the submission to the E-Registration account, but the E-Registration account that's associated with the company registration for the respondent.

MS. SHALAMIAN: And then for the sandbox evaluations, you said that there's going to be--so once you upload either your CSV or XML, am I correct in saying the system will parse out the information and fill in your boxes for you on the web service? At that point you said that there's going to be a test--you can test at that point? Is that going to be--

MR. FOLKES: You will create a button on the screen--

MS. SHALAMIAN: You won't have to go to a separate like E-Tariff and put the file--

MR. FOLKES: It's integrated into the same application both for the Web Interface and for the Form Submission Service.

MS. SHALAMIAN: Okay.

MR. FOLKES: For submitting the XML.

MS. SHALAMIAN: And then earlier you said you were going to explain how you can switch between the two, CSV and XML. Could you explain a little bit about how to do that, if companies wanted to?

MR. FOLKES: Okay, well you have the choice of either uploading your XML or uploading your CSV files. And if you're doing it CSV you can either upload additional transaction CSVs, and with either format you can come in there and modify that data.

There are no plans to allow for XML/CSV and then doing another XML and then another CSV and a manual change, if that's what's being asked. Mixing and matching.

MS. SHALAMIAN: So you can't do that?

MR. FOLKES: You cannot.

MS. SHALAMIAN: Within the same filing?

MR. FOLKES: Correct.

MS. SHALAMIAN: But quarter to quarter you can, if you were to switch?

MR. FOLKES: Yes. Yes, you can initiate with either one, right.

MR. PEDERSON: And different companies of the same corporate family could choose different options. One could use XML and the other one use CSV, right?

MR. FOLKES: That's correct.

MS. SHALAMIAN: I have a couple more questions. About the sandbox, I know you said for the--in order to file a company's filing you have to have the user ID and be registered. Currently some of my clients have several people pulling together the data for them, and those people all have the EQR software on their desktop but they don't have the company ID. So they can't file. But it allows them to know with confidence that when they give their data to the person who is actually compiling the filing and filing it, that it will pass all the validation routines.

So with that in mind, for the sandbox will you be able to use the sandbox without being a registered filer?

MR. FOLKES: No. You'll have to be an E-Registered filer.

MR. BOURQUE: And authorized for that company.

MR. FOLKES: Yes.

MR. BOURQUE: And to follow on on the question that Sarah just asked about who the e-mails would go to, I think you said it would go to the E-Registrant person and the agent that actually did the filing.

Currently the e-mails go to the respondent contacts and the agent contact, and you can do multiple contacts. So does that mean unless the respondent contact was the same person as the e-filer contact they would not be getting an e-mail any longer?

MR. FOLKES: We will make sure that the same people that are getting the e-mail notifications now continue to get the e-mail notifications in the future in the new system.

MR. BOURQUE: Thanks.

MR. KRAVIS: Gary Kravis with Links Technology. We're a software vendor in this space targeting XML-based solution. A couple of questions that are somewhat technical in nature.

I wanted to make sure that, or ask if the schemas are publicly available for inspection? It didn't seem like they were completely provided in the packets.

MR. FOLKES: We provided a draft in the back of the Power Point slides, and I think if they are not accessible we'll make sure that they are posted to the draft XML file--the XML schemas we posted to the EQR portal.

MR. KRAVIS: Thanks. I wasn't able to open that. Do the XML schemas account for versioning? I know the data submitted for an XML was going to change over time. In addition to that, the look-up values that I understand is in one of the XML schemas, those are going to change over time. I want to find out how versioning is managed in there.

MR. ADEROUNMU: Yes. They will be versioned.

MR. KRAVIS: So it will be clear for a filer submitting, or resubmitting, or amending a filing from years prior the look-up values that perhaps are valid today were not valid when they submitted that EQR?

MR. ADEROUNMU: The system is designed to always match look-ups to the filing period.

MR. KRAVIS: Great. How about the EQR services? It seems there's a pretty long list of methods there. Is that publicly discoverable and available for exploration?

MR. FOLKES: No. Not yet.

MR. KRAVIS: Any timeline on that?

MR. FOLKES: We've provided--the only--to the extent we've provided the names of the methods in the Power Point slide, we're not prepared to actually make those publicly available at this point to expose the web services to the public. If you want a different format of the list, we can provide that, of the methods.

MR. KRAVIS: When might they be usable?

MR. THOMAS: We haven't talked--

MR. PEDERSON: Yes, that's something we're going to have to talk about internally. We don't have a timeline on that at the moment.

MR. KRAVIS: One more question. How are the web services secured? How is it that--what's the security around calling the web services and getting responses?

MR. ADEROUNMU: That will be announced in time.

MR. KRAVIS: Okay. Thank you.

MS. SU: Grace Su, S-U, with King & Spalding. I'm not sure if there's no slide, or if the functionality was actually removed, but will we be able to copy data from previous periods?

MR. FOLKES: Yes, you will.

MS. SU: And where--

MR. FOLKES: And the restriction that we know so far as far as copying data from a prior period would be that when you first initialize for the first period we go live we're going to be using a new data structure--the Company Registration IDs, et cetera. You can copy that period to a subsequent period.

MS. SU: And that would be on theoretically slide 16? There would be another bullet saying "copy"?

MR. FOLKES: That's correct.

MS. SU: Okay.

MR. BOURQUE: It's Barb again. Are you saying that for the first time we go to the service you won't be able to copy from a previous period? Did I hear you correctly?

MR. FOLKES: That's correct, because in the existing data we don't have all the assignments for the Company Registration IDs. There might be a little bit of a--we'll bring this up hopefully in subsequent workshops when we get a test site up and running, but it would involve downloading the CSV file, formatting your unique identifiers, the CIDs, et cetera.

MR. PEDERSON: Do we have other questions and comments at this point?

(No response.)

MR. PEDERSON: Okay, thank you. This has been very helpful to us. Hopefully it has been helpful to you. We are going to go back--I know we tabled a few things, some of the drill-downs. We are going to continue on this effort, and we're going to continue our outreach.

I encourage you to contact us with your questions and comments as they come in as you work through this process, and we look forward to your comments whenever they're due. Thank you.

(Whereupon, at 3:00 p.m., Wednesday, July 11, 2012, the technical conference in the above-entitled matter was adjourned.)