

Report of Investigation of Possible Standards of Conduct (SOC) Issue

During the development of a new E-Tag Report, a marketing function employee received historic e-tag data on third party merchant transactions that had occurred during December 2009, and early January 2010. Using the E-Tag Report being developed by Western's merchant, Western's merchant will automatically map its schedules for various transmission paths. This process is currently done manually. The E-Tag Report is in a test environment which is using a replica of historic production data. While the merchant function employee was checking the e-tag data for accuracy, the merchant function employee noticed that there were some tags that did not belong to Western. Four e-tags of the 83 e-tags in the report did not belong to Western's merchant. The incident was reported to the Regional SOC Officer on January 28, 2010, and an investigation was performed. The conclusion reached was that the historic information that was seen by the marketing function employee related to intermittent sales activity occurring 15 to 50 days in the past, and was practically useless to a market participant. Therefore, this historic data does not fully meet the definition of Transmission Function Information as contained in Western's Standards of Conduct Procedures. It was concluded that a SOC violation did not occur. However, as this report is developed further, a non-marketing function intermediary has been assigned to view the e-tag data prior to the marketing function employee so that any e-tags not belonging to the SNR marketing function (WAMPTD) can be redacted from the source files.

Since the E-Tag Report is to eventually be generated each hour for the real-time merchant, the Regional Information Officer in consultation with the Operations Manager has been directed to take steps in generation of the data for the E-TAG Report to ensure that no Transmission System Information is available to the real-time merchant.