



WECC

**Comments and Responses to the Project Coordination, Path
Rating, and Progress Report Process**

PRPTF

November 24, 2020

Introduction

The Path Rating Process Task Force (PRPTF) collected responses from its call for comments and addressed them below. Comments from the PRPTF are provided in red.



Below are comments from AZPS for Project Coordination, Path Rating, and Progress Report Processes.

Comments from Planning/Operations:

1. Remove all references to “Path Operator” including “Path Owner/Operator” and replace with actual NERC functional roles as appropriate

The PRPTF added a definition for Path Operator to the document and clarified the Path Owner definition in Appendix A: Definitions.

2. Add/revise a section to address to NERC/WECC criteria violation issues identified after WECC approved rating, not necessarily due to criteria changes that were added in section 5.5.7

The PRPTF believes a NERC/WECC criteria violation after WECC approved rating is a Compliance or Operational issue. This document should only address the procedure to achieve a path rating. This is a guideline document not a compliance document.

3. Add a section related to re-rating/baselining of WECC path ratings for which a project did not seek an increase, but a positive benefit was seen (i.e. how is a new baseline WECC path rating established, when a new project which provided a path rating benefit, but didn't see a rating increase for it)

If a new project is added that could benefit an Existing Path but did not seek a path rating increase, then the StS would not be in a position to quantify the benefits if the Path Owner does not seek a new rating. The definitive way to recognize the benefits of a new project to the Existing Path rating is to have the Path Owner pursue a new rating via path rating study process.

Hello all,

Apologies for the late comment. I was initially excited to see that there is a new version of the PC/PR/andP document as I had always thought the old document lacked direction as to the main W's of the process: Who and When. What has always been unclear to me is the Who and the When: Who needs to initiate either a Project Coordination or Path Rating process and When in the development of a project does it need to be initiated.

I don't believe this document captures the Who or the When. For example, there are 259 references to "project sponsor", yet "project sponsor" remains undefined. Who is the project sponsor? Is it the generator owner in the instance of a new generation project? Is it the owner(s) of the transmission system to which the generator is interconnecting? "Project sponsor" is not a NERC-defined term and as such, it is paramount that it get defined in this document.

We added a definition in the glossary of terms. The StS will be given the opportunity to accept or reject this change. The StS approved a definition at its November 23, 2020, meeting.

The When is unclear; for example, Phase 1 of the Path Rating Process is initiated when the project sponsor submits a report/writes a formal letter to the RAC and StS. Again, no clear indication as to Who needs to submit the letter or When that happens in context of the development of the project.

3.1, Initiating the Process states, "The sponsor of a project should start the Project Coordination Process when a project is still conceptual"; this is incredibly vague. Currently, the 500 kV system in MT has at least a half dozen different developers who are all in different stages of development. One developer has three projects, one of which is in construction and the other two are in study. Another developer has mentioned that they are fundamentally changing their project given the activity in the area: they may not have a clear vision of their final project. I've not found in this document where it cleanly clarifies whether it should be NWE, the CS partners, any one of the half-dozen developers, or Joan Q Public that is the "project sponsor" or when anything should be initiated. Page 15 suggests that the RAC could be the project sponsor; I struggle to understand how having the RAC sponsor the project is in the best interest of the utilities/owners in general.

The statement is explaining the conflict of interest that could occur if the project sponsor is the RAC chair. The RAC, as a whole, cannot be a project sponsor. The sentence is intended to refer to the employer of the RAC chair, but the wording is unclear. The language in this section has been modified to make it clear that the RAC Chair will not make a Waiver decision if the Chair's employer is the Project Sponsor. The StS and the RAC have approved this change.

Section 2.4, Protection of Ratings. In general, how would paths that have "Other" as their rating be treated in terms of having their rating protected throughout the process?

Paths with "Other" Ratings are not protected because the Rating is not Accepted or Existing. Paths with Other ratings can only receive protection for their path rating if the Path goes through the path rating process and achieves an Accepted rating.

This document remains unclear as to who needs to initiate these WECC processes and when they need to do it.

The definition of Project Sponsor should clarify who needs to initiate the Path Rating Process. The PRPTF agreed that it did not want to put a time constraint on when to start the process to allow flexibility. This process is voluntary.

Thank you for your consideration,

Chelsea

Thank you for the opportunity to comment on the draft changes to the Project Coordination, Path Rating and Progress Report Processes. I have two comments.

1. What is Section 2.4 Protection of Rating trying to say? I found this section confusing. It seems to shift between several items. Could you please reviewed and see if there is a better way to structure this section to better communicate the concepts being discussed?
This section is explaining that an Accepted or Existing path rating cannot be reduced due to adding new paths and the new path(s) would be responsible for mitigating the reduction in the original path rating. The PRPTF notes that this section didn't change very much with this review.
2. Section 4.3.7 Latent Capacitor states, "Latent Capacity is not protected, it cannot be used in operations...." Can we really say it cannot be used in operations since the RC specifies what can be done in the operations horizon?
Latent capacity in this document is referring to the use of fictitious devices to achieve path flows that are higher than the Path Rating. Additional capacity beyond the Path Rating that is available in real-time operations is not Latent Capacity.

Comments from the Bureau of Reclamation

Reclamation asserts the August 2020 Project Coordination Path Rating and Progress Reporting document is an improvement over the 2015 version of the document. Reclamation appreciates that the 2020 version provides more specificity as to how to coordinate new projects and update existing projects.

Reclamation recommends the Project Coordination, Path Rating, and Progress Report Processes document provide additional guidance when describing the process for entities to seek removal of facilities from the Path Rating Catalog. Specifically, the information in Section 7 does not provide adequate relief for an owner of a small facility at the end of a path owned by another entity.

An entity impacted will be notified and have an opportunity to comment as per Section 7 in steps 2 and 3. Clarifying changes were made to Section 7.

Finally, Reclamation recommends a thorough QA/QC review of the Project Coordination Path Rating and Progress Report Processes document. There are numerous grammatical and typographical errors as well as formatting and spacing inconsistencies.

Another technical edit was done prior to approval. The PRPTF thanks the USBR for their thorough review.