

NAESB Order 890 Curtailment Request

ECC Task Force
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Overview of NAESB Standard Development Effort

- FERC directed “transmission providers (working through NAESB) to develop a detailed template for the posting of additional information on OASIS regarding firm transmission curtailments” (Order 890 P1627)
 - This is in addition to the existing FERC requirements outlined in 18 CFR 37.6 e(3)
- This effort is being worked jointly by the NAESB OASIS and Business Practice Subcommittees as 2019 Annual Plan Item (API 2a) due in 1H’19.
- The emerging NAESB standards will only be applicable to curtailments issued under “interconnection-wide congestion management procedures” (i.e., those issued by a Reliability Coordinator).
 - Thus, the information to be posted must ultimately come from the tools used to manage those curtailments (i.e., IDC in the East and webIntegrity/ECC in the West).
- There is a long road before these standards would be mandatory.
 - The standards themselves are still under development
 - There are 3 levels of NAESB votes necessary for approval.
 - The standards would need to be published by NAESB.
 - Then a FERC NOPR and Final Order would be needed.

Current NAESB Status

- Business Practice Standards have been drafted applicable to Transmission Providers obligating them to post this curtailment information on OASIS and providing timing and data retention requirements. [WEQ-001]
- The necessary curtailment information has been mostly identified.
 - Data was initially based on what is available from the IDC tool in the East.
 - Proposed templates have been identified establishing data needs. [WEQ-002]
 - The definition of these data elements is in the process of being documented in WEQ-003 Data Dictionary.
 - This data has mostly been vetted by the IDC owners.
 - An initial review by Peak has also confirmed that most of this data is available in the ECC as well. No major show-stoppers identified so far.
- NAESB also needs to ensure that this data is made available by the Reliability Coordinators for the Transmission Providers to meet the posting requirement.
 - There are already NAESB standards applicable to RC's in the East. Those have been updated to require making this data available to the TP's. [WEQ-008]
 - There are no NAESB standards in place today that are applicable to RC's in the West.

Western Interconnection Help Needed

- General Awareness and Buy-in:
 - Be aware that this is underway. Engage as appropriate to influence drafting of standards that are amenable to the West. Prepare as necessary to meet future FERC compliance.
- Technical Help Needed:
 - Help NAESB finish vetting the data element definitions. Identify any data fields or valid data values that would need to be specific to the ECC. Identify any show-stoppers. Identify any non-showstoppers that may still need future ECC development.
 - Peak is not a NAESB member, so their participation is restricted. CAISO is a NAESB member and has agreed to be involved.
 - Manage the ECC roadmap accordingly to meet anticipated FERC approval and compliance requirements.
- Policy Help Needed:
 - How to close the gap in which there are no NAESB standards already applicable to RC's in the West that can be updated to obligate RC's to provide the necessary data.
 - There are a few options here, but the easiest would probably be to develop a western NAESB standard that mirrors WEQ-008 in the East. Where and how to drive this?

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