



Electric Reliability and Security for the West

WECC Criterion
INT-004-WECC-CRT-3.1

Introduction

1. **Title:** Treatment of Reliability Adjustments
2. **Number:** INT-004-WECC-CRT-3.1
3. **Purpose:** To ensure uniform treatment of reliability-based Curtailment(s) through a Reliability Adjustment Arranged Interchange (RAAI)
4. **Applicability:**
 - 4.1. **Functional Entities:**
 - 4.1.1. Balancing Authority
 - 4.1.2. Transmission Service Provider
5. **Effective Date:** April 1, 2019

Requirements and Measures

- WR1.** Each Balancing Authority and Transmission Service Provider submitting a Curtailment as an RAAI shall do so with a start time no earlier than ten minutes prior to the submittal time.
- WM1.** Each Balancing Authority and Transmission Service Provider submitting a Curtailment as an RAAI will have evidence that those transactions met the criteria specified in WR1. Evidence may include, but is not limited to, production of an Interchange Transaction Tag that included a Curtailment through an RAAI with the start time and submittal time reflecting the parameters of WR1.
- WR2.** Each Balancing Authority and Transmission Service Provider shall approve a market adjustment when the Purchasing-Selling Entity reduces its transmission allocation profile to an amount equal to or greater than the reliability limit profile, and the start time of the adjustment is no earlier than the Curtailment start time.
- WM2.** Each Balancing Authority and Transmission Service Provider will have evidence that it approved each market adjustment received that met the criteria described in WR2. Evidence may include, but is not limited to, production of an Interchange Transaction Tag that includes approval reflecting the parameters of WR2.
- WR3.** Each Source and Sink Balancing Authority shall approve each Curtailment submitted as an RAAI, within the reliability assessment period identified in NERC INT standards, or their successor.
- WM3.** Each Source and Sink Balancing Authority will have evidence that it approved each Curtailment submitted as an RAAI, meeting the criteria specified in WR3.
- WR4.** Each Balancing Authority and Transmission Service Provider initiating a Curtailment shall ensure that the Curtailment meets each of the following:
- 1) Releases its own reliability limit profile on the Interchange Transaction Tag, when the reliability event allows for the reloading of the transaction, without releasing the reliability limit of other Balancing Authorities and Transmission Service Providers;
 - 2) The current level on the Interchange Transaction Tag shall not be greater than the most limiting reliability limit. (Refer to the Rationale Section for narrative regarding the “current level”.)
- WM4.** Each Balancing Authority and Transmission Service Provider will have evidence that, when initiating a Curtailment, the Curtailment met each of the criteria described in WR4. Evidence may include, but is not limited to, production of the Interchange Transaction Tag(s) containing each of the characteristics specified in WR4.



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WR5. Each Balancing Authority and Transmission Service Provider shall use the e-Tag as the primary tool to communicate Reliability Adjustment RFIs when transmission curtailment on its system is required.

WM5. Each Balancing Authority and each Transmission Service Provider will have evidence that it used the e-Tag as its primary tool to communicate Reliability Adjustment RFIs as required in WR5. Evidence may include, but is not limited to, production of the associated e-Tag.



Version History

Version	Date	Action	Change Tracking
1	March 7, 2007	Operating Committee Approved	Initial
2	August 31, 2009	Converted current approved Business Practice (INT-BPS-004-0) into new Regional criterion format.	No substantive change
2	September 5, 2012	WECC Board of Directors changed designation from "CRT" to "RBP."	Designation change
2	March 13, 2013	WECC Board of Directors Approved	Developed as WECC-0077. Updated as part of INT Rewrite Project
2	June 25, 2014	WECC Board of Directors changed designation from "RBP" to "CRT."	Designation change
2.1	January 28, 2016	Errata	The nomenclature changed from RBP to CRT. In the Applicability section, the plural of Balancing Authorities was changed to the singular Balancing Authority.
2.1	April 1, 2016	No Change	Converted to new template
3	December 5, 2018	WECC Board of Directors approved along with WECC-0121A INT-001-WECC-CRT-2.1, e-Tag Requirements for WECC including Wrongful Denial of RFI, in which WECC-0121A, Requirement WR1 and WM1 were approved for relocation to this document.	<p>Developed as WECC-0129 in parallel with WECC-0121A.</p> <p>Changes include: 1) enhanced syntax and drafting conformity, 2) updates to the Title and Purpose statements, 3) in WR1, "RFI" was replaced with "Curtailment as an RAAI" and "submission" was replaced with "submittal," 4) in WR2, "Interchange Transaction" was changed to "market adjustment," 5) in WR3, "Curtailment" was replaced with "each Curtailment submitted as an RAAI" and "addressed" was replaced with "identified," 6) in WR4, each "Reliability Adjustment" was replaced with "the Curtailment." Measures were updates accordingly.</p> <p>Relocation of Requirement creating WR5</p> <p>Ballots ran concurrently for WECC-0121A and WECC-0129. Both were approved. As a result, WECC-0121A WR1/WM1 of WECC-</p>



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			121A was deleted from WECC-0121A and inserted into WECC-0129 as WR5/WM5.
3.1	June 18, 2019	Errata	<p>Converted to newest template.</p> <p>In Version 3.1: 1) “Request-For-Interchange” was replaced with “Request for Interchange” and the “RFI” acronym, 2) “with respect to” was replaced with regarding the” (Rationale), 3) “portions” was replaced with “parts” (Rationale), 4) “WECC Requirement (WR)” was replaced with “WECC Requirement”, 5) a footnote was added connecting “NERC Glossary of Terms Used in Reliability Standards” to “NERC Glossary” and, 6) Version History syntax was corrected.</p>

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Attachments

Not used.



Rationale

Purpose

The stated purpose of this document is to “ensure uniform treatment of reliability-based Curtailment(s) through a Reliability Adjustment Arranged Interchange (RAAI).”

This document recognizes that there are multiple NERC Glossary terms that could pertain to a Curtailment request type on a Request for Interchange (RFI), such as Reliability Adjustment Arranged Interchange (RAAI) and Curtailment.¹

If there is confusion regarding the applicability of the NERC terms noted above, the underlying concept is that any WECC reliability entity issuing a Curtailment request type on an RFI (no matter which of the two defined terms above describes the underlying reason for this action), the Curtailment will be approved by all, and will not be denied within WECC.

This document also recognizes that the NERC Glossary contains multiple defined terms representing synonyms for RFIs, or subsets and parts thereof. Some of these definitions are still used colloquially but no longer have an effective date.²

To avoid confusion and for purposes of this document, whether the term Curtailment is used in a WECC Requirement (WR) or used in any portion or type of an RFI, the term carries the definition used in the NERC Glossary.

Requirement WR1

Both the Balancing Authority and the Transmission Service Provider are responsible for initiating Curtailments.

WR1 was historically included because the North American Energy Standards Board (NAESB) e-Tag specification did not address the ability of adjusting the time on reliability adjustments in the past. Tagging vendors indicated that drafting a business practice mandating this functionality would permit the vendor to update the software coding at no cost. To remedy the concern, the WECC Interchange Scheduling and Accounting Subcommittee (ISAS) determined that allowing RFIs a start time no longer

¹ NERC Glossary of Terms Used in Reliability Standards (NERC Glossary).

² For example:

Reliability Adjustment Arranged Interchange	Project 2008-12 Coordinate Interchange Standards	FERC approval 6/30/2014; effective 10/1/2014	A request to modify a Confirmed Interchange or Implemented Interchange for reliability purposes.
Reliability Adjustment RFI	Project 2007-14 Coordinate Interchange— Timing Table	FERC approved 12/17/2009; no effective date listed.	Request to modify an Implemented Interchange Schedule for reliability purposes.

than ten minutes in the past addressed the ability to put an element back in service prior to performing reliability adjustments (Curtailments). Additionally, this reduces the amount of potential inadvertent interchange that can occur.

Requirement WR2

WR2 originated to ensure Balancing Authorities and Transmission Service Providers approve market adjustments, releasing the transmission profile to match reliability adjustments. The benefit of requiring this functionality is twofold: 1) transmission customers can prevent unwanted reloads and 2) transmission customers can potentially utilize the transmission rights elsewhere.

Requirement WR3

WR3 requires the Source and Sink Balancing Authority to approve all Curtailments within the reliability assessment period identified in NERC INT standards, or their successor.

WR3 recognizes that, within the Western Interconnection, the established practice is to approve each Curtailment submitted, without exception.

In applying this requirement, it must be noted that, by definition, a Curtailment is a “*reduction in scheduled capacity or energy delivery.*”³ (Emphasis added.) Per that definition, a Curtailment cannot be an *increase* in scheduled capacity or energy delivery, even though a software function may allow it.

Further detail addressing treatment of Curtailments and reloads is contained in the NAESB e-Tag specification.

Requirement WR4

WR4 ensures that, when multiple Curtailments and reliability limits are set by Balancing Authorities and Transmission Service Providers, those limits are adhered to by parties on the e-Tag.

The multiple reliability limits set by each Balancing Authority and Transmission Service Provider should be managed by each entity and should be released by each entity when the reliability event is over. However, the overall reliability limit should be based on the most limiting level set across all Balancing Authorities and Transmission Service Providers.

The “current level” referred to in WR4 is a reference to that proper noun as a defined term in the NAESB e-Tag specification document. The “current level” should not exceed the most limiting reliability event. This ensures that, once an e-Tag is reloaded by one entity, another entity such as a Balancing Authority or Transmission Service Provider does not need to initiate a curtailment to reset the reliability limit.

³ NERC Glossary

Requirement WR5

This requirement was imported from WECC-0121A INT-001-WECC-CRT-2.1, e-Tag Requirements for WECC including Wrongful Denial of RFI. See Version History table.

