Ms. Sarah Crawford, Counsel, Legal & Regulatory

North American Electric Reliability Corporation

1401 H Street NW, Suite 410

Washington, D.C. 20005

Subject: WECC-0149 FAC-501-WECC-4 Transmission Maintenance (RRS)

Table Revision Process (Process)

Major WECC Transfer Paths in the Bulk Electric System (Table)

Dear Ms. Crawford,

This request seeks NERC/FERC approval for the RRS and the associated freestanding Process in which the Table is located. Although the Process is not a Standard, both the RRS and the Process were developed using the WECC Reliability Standards Development Procedures (Procedures).

**Overview**

This project is the result of two Standard Authorization Requests (SAR).[[1]](#footnote-1) This project:

1) Fulfills WECC’s five-year review obligation for FAC-501-WECC-2, Transmission Maintenance.[[2]](#footnote-2)

2) Deletes Paths 22, 50, 51[[3]](#footnote-3), and 73[[4]](#footnote-4) from the Table.

3) Removes the Table from the RRS, placing it inside the Process.

If approved, the Process will function independent of the Procedures when changing the *content* of the Table. By contrast, the Procedures will be applied to make changes to the Process itself.

**Version Control**

Because this project was developed from two separate SARs, this project nomenclature jumps from FAC-501-WECC-2 directly to FAC-501-WECC-4.

FAC-501-WECC-2[[5]](#footnote-5) is the current FERC-approved version.

FAC-501-WECC-3[[6]](#footnote-6) was not received by NERC for disposition.

FAC-501-WECC-3 was developed to meet WECC’s required five-year review. Version 3 received a 100% affirmative ballot[[7]](#footnote-7), followed by WECC Board of Director (Board) approval.[[8]](#footnote-8) However, after forwarding Version 3 to NERC for review, WECC/NERC concluded that with minor changes to Version 3 and its Implementation Plan, the project could be more quickly implemented. As a result, Version 3 was not presented to the NERC Board of Trustees (BOT).

FAC-501-WECC-4[[9]](#footnote-9) superseded FAC-501-WECC-3.

FAC-501-WECC-4 and the associated Process was developed to facilitate implementation of changes requested in SAR WECC-0141. Like Version 3, Version 4 received a 100% affirmative ballot[[10]](#footnote-10), followed by Board approval.[[11]](#footnote-11)

If you have questions, please feel free to contact me.

Sincerely,

Steven Rueckert

WECC Director of Standards

For documentation support please contact W. Shannon Black, at (503) 307-5782.

Where appropriate, language in this filing is standardized to ensure a clear connection between WECC-0141 and WECC-0149. Original documents are located on the WECC-0141[[12]](#footnote-12) and WECC-0149[[13]](#footnote-13) project pages. Final documents for this filing are located on the WECC-0149 project page at the NERC Filings accordion.

To accommodate sorting and software limitations, all files have been assigned a “WECC-0149 FAC-501-WECC” prefix.

|  |  |  |
| --- | --- | --- |
| WECC-0141 FAC-501-WECC-3 Transmission Maintenance |  | **Final Uploaded** |
| **SAR – Standard Authorization Request Attachment A-1** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment A-1 SAR WECC-0141**Standard Authorization Request* |
| **SAR – Standard Authorization Request Attachment A-2** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment A-2 SAR WECC-0149**Standard Authorization Request* |
| **Regional Reliability Standard(s) (Clean As-Approved) Attachment B** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment B Clean as Approved V2**Clean as Approved* |
| **Regional Reliability Standard(s) (Clean Proposed) Attachment C-1** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment C-1 Clean as Proposed V4**Clean as Proposed.* *Note: FAC-501-WECC-3 clean is not included in this filing because it is superseded by WECC-0149 FAC-501-WECC-4 and was not submitted to NERC for disposition.*  |
| **Table Revision Process (Clean Proposed) Attachment C-2** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment C-2 Clean as Proposed – Table Revision Process**Note: The WECC-0141 Table Revision Process is not included because it is superseded by WECC-0149 FAC-501-WECC-4.*  |
| **Regional Reliability Standard(s) (As Approved Attachment B Redlined to As Proposed Attachment C-1)****Attachment D** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment D As Approved V2 Redline to Proposed V4**FAC-501-WECC-2 (V2) Redlined to As Proposed FAC-501-WECC-4 (V4).* |
| **Project Roadmap Attachment E**  |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment E Project Roadmap**Note: This Roadmap includes events from both SARs.* |
| **Implementation Plan Attachment F** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment F Implement Plan Combined**Implement Plan Combined* |
| **Technical Justification Attachment G** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment G Tech White Paper**Technical Justification White Paper* |
| **VRF & VSL Justification Attachment H** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment H VRF VSL – No Change* *Violation Risk Factors and Violation Severity Limits – Not Used – No Change* |
| **Issue Table and Mapping Document Attachment I – Optional** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment I Mapping - Not Used**Mapping - Not Used*  |
| **Regional Reliability Standard Submittal Request Attachment J** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment J RRS Submittal Request**RRS Submittal Request* |
| **Order 672 Criteria Attachment K** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment K 672 Criteria**Order 672 Criteria* |
| **Drafting Team Roster with Biographies Attachment L** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment L Drafting Team Roster Bios**Drafting Team Roster Biographies* |
| **Ballot Pool Members Attachment M-1**  |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment M-1 Ballot Pool WECC-0141* *Ballot Pool WECC-0141* |
| **Ballot Pool Members Attachment M-2**  |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment M-2 Ballot Pool WECC-0149**Ballot Pool WECC-0149* |
| **Final Ballot Results Attachment N-1** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment N-1 Ballot Result WECC-0141**Ballot Result WECC-0141* |
| **Final Ballot Results Attachment N-2** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment N-2 Ballot Result WECC-0149**Ballot result WECC-0149* |
| **Guidance Document Attachment O – Optional (White Paper)** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment O Guidance White Paper**Guidance White Paper* |
| **Minority Issues Attachment P-1** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment P-1 Minority Issues WECC-0141**Minority Issues WECC-0141* |
| **Minority Issues Attachment P-2** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment P-2 Minority Issues WECC-0149**Minority Issues WECC-0149* |
| **WECC Standards Committee Roster Attachment Q-1** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment Q-1 WSC Roster WECC-0141**WECC Standards Committee (WSC) Roster WECC-0141* |
| **WECC Standards Committee Roster Attachment Q-2** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment Q-2 WSC Roster WECC-0149**WECC Standards Committee Roster WECC-0149* |
| **WECC-0141 Responses to Comments** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment R01 Response 1 WECC-0141**File Name: WECC-0149 FAC-501-WECC - Attachment R02 Response 2 WECC-0141**File Name: WECC-0149 FAC-501-WECC - Attachment R03 Response 3 WECC-0141**File Name: WECC-0149 FAC-501-WECC - Attachment R04 Response 4 WECC-0141**File Name: WECC-0149 FAC-501-WECC - Attachment R05 Response 5 WECC-0141**File Name: WECC-0149 FAC-501-WECC - Attachment R06 Response 6 WECC-0141**File Name: WECC-0149 FAC-501-WECC - Attachment R07 Response NERC 45 WECC-0141* |
| **WECC-0149 Responses to Comments** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment R08 Response 1 WECC-0149**File Name: WECC-0149 FAC-501-WECC - Attachment R09 Response 2 WECC-0149**File Name: WECC-0149 FAC-501-WECC - Attachment R10 Response NERC 45 WECC-0149* |
| **FERC Issues Table Attachment S – Optional**  |  |  |
|  *File Name: WECC-0149 FAC-501-WECC - Attachment S FERC Issues - Not Used**FERC Issues - Not Used* |
| **Additional Supporting Documentation Attachment T and T1 - T10** |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment T - Add Doc Cover Letter**File Name: WECC-0149 FAC-501-WECC - Attachment T01 - Add Doc APS Internal Delisting* *File Name: WECC-0149 FAC-501-WECC - Attachment T02 - Add Doc APS RAC Meeting 10-18-2019**File Name: WECC-0149 FAC-501-WECC - Attachment T03 - Add Doc APS Letter 1 to WECC 09-03-2019**File Name: WECC-0149 FAC-501-WECC - Attachment T04 - Add Doc APS Letter 2 to FERC 09-15-2021**File Name: WECC-0149 FAC-501-WECC - Attachment T05 - Add Doc APS SWAT Meeting 08-21-2019**File Name: WECC-0149 FAC-501-WECC - Attachment T06 - Add Doc BPA Resp to WECC - 02-16-2022**File Name: WECC-0149 FAC-501-WECC - Attachment T07 - Add Doc BPA John Day Rept 12-2020**File Name: WECC-0149 FAC-501-WECC - Attachment T08 - Add Doc BPA Intent to Delist 01-15-2021**File Name: WECC-0149 FAC-501-WECC - Attachment T09 - Add Supp Doc BPA Delisting OASIS 05-2021**File Name: WECC-0149 FAC-501-WECC - Attachment T10 - Add Doc BPA Completion 05-12-2021**File Name: WECC-0149 FAC-501-WECC - Attachment T11 - Add Doc - DT in Support of Retiring* |
| **Petition Filing (FERC) Attachment U – Optional**  |  |  |
| *File Name: WECC-0149 FAC-501-WECC - Attachment U – Petition - Not Used**Not Used* |
| \*Applicable governmental authorities in the United States, Canada, and Mexico  |
| *To be provided by NERC.* |

**Appendix 1**

**Proposed Changes**

FAC-501-WECC-4 proposes the following changes to FAC-501-WECC-2. The styles and format of FAC-501-WECC-4 are updated to match NERC’s most current document template.

* A. Introduction
	+ The Purpose statement is updated for readability and proper referencing.
	+ The Applicability section is updated for readability.
	+ Section 5, Facilities, is added to accurately identify the applicable facilities.
* B. Background
	+ A Background section was added. This section highlights that even though the impacted paths require elevated maintenance, *neither this nor any previous filing provides technical support explaining why those paths are included in the Table.*
	+ Special Note: Although balloted with the Background included, when balloted the Ballot Pool was aware that NERC may/may not remove or relocate the Background section at its discretion. Because there is no technical support explaining the origin of the path list, it is recommended that the Background be retained for future stakeholders to explain “how we got here.”
* C. Requirements and Measures
	+ Updated for readability.
* D. Compliance
	+ Updated for readability.
* E. Regional Variance
	+ No change
* F. Associated Documents
	+ This section adds a reference to the Table Revision Process, highlighting that the Table Revision Process is a freestanding document that is neither a Standard nor a part of a Standard.
* Attachment A – Transmission Maintenance and Inspection Plan (TMIP)
	+ Section 2 – Maintenance, existing descriptions were elaborated. Risk-based and Original Equipment Manufacturer maintenance methods were added.
	+ Remaining sections of Attachment A were updated for readability.
* Attachment B – Major WECC Transfer Paths in the Bulk Electric System
	+ *In Version 4, Attachment B is removed entirely from Version 4 with the updated path listing migrating to the proposed freestanding Process.*
	+ Between Version 2 and Version 3, Paths 22, 50, 51, and 73 were removed from Attachment B.
1. WECC-0141 and WECC-0149, both included with this filing. [↑](#footnote-ref-1)
2. For a list of proposed changes to the RRS, please see Appendix 1. [↑](#footnote-ref-2)
3. Arizona Public Service (APS) Paths [↑](#footnote-ref-3)
4. Bonneville Power Administration (BPA) Path [↑](#footnote-ref-4)
5. FERC-approved May 30, 2018; Effective July 1, 2018. [↑](#footnote-ref-5)
6. Developed as Standard Authorization Request (SAR) WECC-0141. [↑](#footnote-ref-6)
7. October 21, 2021. [↑](#footnote-ref-7)
8. December 8, 2021. [↑](#footnote-ref-8)
9. Developed as Standard Authorization Request (SAR) WECC-0149. [↑](#footnote-ref-9)
10. February 2, 2023. [↑](#footnote-ref-10)
11. June 14, 2023. [↑](#footnote-ref-11)
12. <https://www.wecc.org/Standards/Pages/WECC-0141.aspx> [↑](#footnote-ref-12)
13. <https://www.wecc.org/Standards/pages/wecc-0149.aspx> [↑](#footnote-ref-13)