# Implementation Plan[[1]](#footnote-2)

## Overview

The proposed effective date for this project is the first day of the second quarter following regulatory approval.

This project is the culmination of two projects: WECC-0141, FAC-501-WECC-2, Transmission Maintenance and WECC-0149, FAC-501-WECC-4, Transmission Maintenance and Table Revision Process. FAC-501-WECC-3, Transmission Maintenance is not submitted as that version was immediately superseded by Version 4 and was not submitted to NERC for disposition.

### Pre-SAR Development

Prior to filing Standard Authorization Request (SAR) WECC-0141 and triggering the WECC Reliability Standards Development Procedures (Procedures), the Transmission Owners vetted the expected reliability impacts with various technical committees[[2]](#footnote-3), and provided notice of their intent to have the paths delisted. The pre-SAR process conformed to the WECC 2021 Path Rating Catalog (March 2021), and the WECC Project Coordination, Path Rating and Progress Report Processes (2015). Although these pre-Procedure processes have many of the same study/comment/response attributes of the Procedures, they are advisory and not enforceable.

Upon completing the Pre-SAR processes to delist specific paths from the WECC Path Rating Catalogue, SAR WECC-0141 was filed to delist the same paths from FAC-501-WECC-2, Transmission Maintenance.

### WECC-0141—Path Removal

The original WECC-0141 Implementation Plan is located [here.](https://www.wecc.org/Reliability/WECC-0141%20FAC-501-WECC%20Posting%203%20-%20%20Attachment%20F%20-%20Implementation%20Plan%20-%20To%20Tech%2002-19-2021.docx)[[3]](#footnote-4) (See also Appendix 1.)

Among other things, WECC-0141 and its associated development process requested: 1) removal of specific paths[[4]](#footnote-5) from the FAC-501-WECC-2, Transmission Maintenance, Attachment B, Major WECC Transfer Paths in the Bulk Electric System (Table), 2) changing the Table’s title, thereby breaking any incorporation by reference present in peripheral documents, and 3) creation of an expedited process whereby the list of paths on the Table could be expeditiously modified.

In WECC-0141, both the Table and the proposed process remained a part of the proposed Regional Reliability Standard (RRS). That would change in the iterative SAR WECC-0149.

Once WECC-0141 was filed, the project was posted for comment six times, receiving a 100% affirmative approval from a WECC Ballot Pool.

Because the proposed RRS created no new burden on applicable entities, the drafting team proposed an effective date of the first day of the second quarter following regulatory approval.

### Peripheral Impacted NERC Documents

The WECC-0141 Plan also identified specific NERC-approved documents[[5]](#footnote-6) in which the Table is incorporated by reference. Thus, changes made to the Table per WECC-0141 and later WECC-0149 would self-execute into those peripheral documents.

The WECC-0141 plan suggested that NERC could replace the references to the Table with the actual Table, thereby making only non-substantive changes within the purview of the NERC Standards Committee. The proposed approach, if accurate, would exponentially expedite implementation of FAC-501-WECC-4.

The plan was premised on the conclusion that although the NERC Standards Committee is not allowed to make substantive changes to a Standard,[[6]](#footnote-7) the committee is empowered to determine whether a change to a Standard is substantive or non-substantive.[[7]](#footnote-8) The drafting team concluded that replacing the reference to the Table with the actual Table was equivalent to a non-substantive change within the purview of the NERC Standards Committee. Much like an errata, if references to the Table were replaced with the actual Table, that approach would “not change the scope or intent of the associated Reliability Standard, and [would have] no material impact on the end users of the Reliability Standard.” As such, that proposed approach would allow for “approval with Applicable Governmental Authorities as appropriate.”[[8]](#footnote-9)

When reviewing the plan with NERC, NERC did not concur with the drafting team as to the powers of the NERC Standards Committee. As such, changes to the peripherally referenced documents would need to be included in NERC’s work plan. Alternatively, if the structure of the project was altered, implementation of FAC-501-WECC-4 might be expedited. Thus, WECC-0149 was initiated.

### WECC-0149—Table Revision Process

The original WECC-0149 Implementation Plan is located [here.](https://www.wecc.org/Reliability/WECC-0149%20FAC-501-WECC-4%20Trans%20Maint%20%20-%20Attachment%20F%20-%20Implementation%20Plan.docx)[[9]](#footnote-10) (See also Appendix 2.)

In WECC-0149, the Table and the proposed Process were extracted from the RRS and relocated into the proposed freestanding Table Revision Process.

Although WECC-0149 does not eliminate the incorporation by reference issues, by creating the proposed freestanding WECC/NERC/FERC-approved Process, the undue surprise created by self-execution is reduced. Further, NERC would not be required to make changes to the various identified documents—thereby expediting implementation of the original request. The WECC-0149 Plan retained the same proposed effective date for the same reasons.

**Appendix 1
WECC-0141 Implementation Plan**

# Implementation Plan

## Standards Authorization Request (SAR)

The original SAR is located [here.](https://www.wecc.org/Standards/Pages/WECC-0141.aspx)

Documentation templates will be updated for final filing.

## Approvals Required

* WECC Ballot Body October 21, 2021
* WECC Board of Directors December 8, 2021
* NERC Board of Trustees Targeted for May 2024
* FERC Pending

## Effective Date

The proposed effective is the “First day of the second quarter following regulatory approval.” Because changes to FAC-501-WECC-2 Transmission Maintenance may impact other NERC Standards, the drafting team recommends NERC review the following documents, consider whether remediation is required, and if so, coordinate an effective date with all impacted documents.

Other NERC documents potentially impacted by changes to FAC-501-WECC-2 include the following:

1. FAC-003-4, Transmission Vegetation Management
2. PRC-023-4, Transmission Relay Loadability, Attachment B
3. NERC Glossary of Terms Used in Reliability Standards (Glossary)

For more information, please see Other Standards Impacted and [Attachment 1A WECC-0141 Posting 1](https://www.wecc.org/Reliability/WECC-0141%20Posting%201%20FAC-501-WECC%20Path%20Delist%20-%20Attachment%20R1A-%20Response%20to%20Comments%20-%20Attachment%20A.pdf) presented as part of this filing.

## Justification of Effective Date

### Attachment B

This project proposes removal of four paths from FAC-501-WECC-2, Transmission Maintenance, Attachment B, WECC Major Transfer Paths (Attachment B). The project also proposes creation of Attachment C, Revision Process, whereby paths could be added to and removed from Attachment B. If approved, Attachment C would be used for adding and/or removing Path Names from Attachment B in lieu of using the WECC Reliability Standards Development Procedures (Procedures).

This project proposes removal of Paths 22, 50, 51, and 73 from Attachment B. Removal of the four paths was fully vetted and approved using the Procedures, augmented by Arizona Public Service’s (APS) and the Bonneville Power Administration’s (BPS) direct coordination of this effort with WECC staff, impacted Transmission Owners/Operators, and the engineering and operating committees representing the impacted Transmission Owners.[[10]](#footnote-11) The reliability impacts of removing the four paths have been fully vetted and approved at the aforementioned stages and will also be presented to a WECC Ballot Pool and the WECC Board of Directors with a request for approval.

Implementation of the requested effective date will have no negative impact on reliability within the Western Interconnection; however, a coordinated effective date with other NERC documents should be considered by NERC. See Impacts on Other Standards.

### Attachment C

This project proposes inclusion of Attachment C, Revision Process as a supporting document to address changes to Attachment B in lieu of the Procedures. This approach was approved/suggested by FERC when Version 1 of the project was approved.

Creation of Attachment C is an essential step in this standard’s evolution as the content of Attachment B was created *circa 1997,* has been virtually unchanged since its inception, and there exists no record describing *why* the listed Path Names were originally included nor by what criteria future paths should be added or existing Path Names removed.[[11]](#footnote-12) Proposed Attachment C addresses each of these concerns by acknowledging the unknown background of each path’s inclusion while providing a forward-looking means for due process review to add or remove paths from Attachment B.

Because proposed Attachment C mandates both due process plus reliability review, approval of the effective date creates neither undue surprise nor negative impact to reliability within the Western Interconnection. However, a coordinated review of the other identified NERC documents should be undertaken by NERC before an effective date is established.

## Impact on Other Standards

The title of FAC-501-WECC-2, Attachment B is “Major WECC Transfer Path in the Bulk Electric System by WECC.” The title is a holdover from Version Zero documents.[[12]](#footnote-13) This precise capitalized term is used in the Applicability section of FAC-003-4, Vegetation Management without further reference or definition. A lowercase similar phrase “major transfer path within the Western Interconnection” is used in Section B. Criteria of PRC-023-4, Transmission Relay Loadability and also in the definition of the Bulk Electric System (BES) contained in the NERC Glossary.

If FAC-003-4 is referencing the content (Path Names) of FAC-501-WECC-2, Attachment B, any changes made to Attachment B will self-execute in FAC-003-4 creating due process and implementation concerns for FAC-003-4. Because changes to FAC-003-4 are outside of the scope of this project, the drafting team encourages NERC to review that standard and make changes if deemed necessary. To the extent a change to either FAC-501-WECC-2 or FAC-003-4 impacts the opposite standard, NERC should consider remediation and a coordinated effective date of all impacted documents.

If PRC-023-4 is referencing or relying on FAC-501-WECC-2, Attachment B to determine applicability, NERC should review PRC-023-4 and consider remedial changes. If changes are made, NERC should consider coordinating the effective date of all impacted documents.

If the NERC Glossary definition of the BES relies on FAC-501-WECC-2, Attachment B for detail, the glossary should be revisited with a coordinated effective date in mind.

The drafting team does not definitely conclude that these documents are intertwined. Rather, the drafting team provides the concern to NERC for consideration and treatment—if deemed necessary—per the NERC Rules of Procedure and associated standards development processes.

**Potential Remedy**

If a NERC review determines that FAC-003-4 relies on FAC-501-WECC-2, Attachment B to determine how FAC-003-4 is implemented, the remedy may be as simple as importation of Attachment B content from FAC-501-WECC-2, Attachment B into FAC-003-4 as an attachment. Because FAC-501-WECC-3 proposes to change the title of Attachment B, FAC-003-4 could retain the existing reference without upsetting the Applicability verbiage. Because the referenced content is being imported (relocated) and not changed, the importation may be seen by NERC as an errata per its Rules of Procedure.[[13]](#footnote-14)

As to the PRC-023-4 and the NERC Glossary there is a much more tenuous connection due to the lowercase case and the similar but not precise verbiage. Because of this tenuous connection, the drafting team suggests that there is no immediate need to make changes to those two documents. As such, NERC could consider delaying review of the matter for PRC-023-4 and the NERC Glossary until the normally scheduled review.

**Consideration of Early Compliance**

As to FAC-501-WECC-3, the drafting team sees no concerns with early compliance within the Western Interconnection. However, if NERC concludes that documents outside of the scope of this project require remediation, the drafting team encourages NERC to coordinate the effective dates of those impacted documents.

**Appendix 1
WECC-0149 Implementation Plan**

# Implementation Plan

## Standards Authorization Request (SAR)

This project augments WECC-0141, FAC-501-WECC-3, Transmission Maintenance, Update to Attachment B, Major WECC Transfer Paths in the Bulk Electric System (Table).

SARs for WECC-0141 and WECC-0149 are located [here](https://www.wecc.org/Standards/Pages/WECC-0141.aspx) and [here,](https://www.wecc.org/Standards/pages/wecc-0149.aspx) respectively.

*Note: Documentation templates and version references will be updated for final filing.*

This project:

1. Updates WECC-0141 FAC-501-WECC-3 (creating FAC-501-WECC-4) to include:
	1. Conforming the language throughout to incorporate the WECC-0149 Process.
	2. Updating the Compliance section to accept NERC’s newest boilerplate.
	3. Deleting FAC-501-WECC-3, Attachment B, Path Names Identified for Transmission Maintenance and Inspection, and migrating that list into the WECC-0149, Process, Attachment A, Major WECC Transfer Paths in the Bulk Electric System.
	4. Deleting FAC-501-WECC-3, Attachment C, Revision Process, and replacement of that process with the WECC-0149 Table Revision Process.
2. Creates a process for modifying the content of the Table Revision Process, Attachment A, major WECC Transfer Paths in the Bulk Electric System.

The WECC-0149 Table Revision Process creates a means of modifying the content the Table outside of the WECC Reliability Standards Development Procedures (Procedures).

## Approvals Required

* WECC Ballot Body February 2, 2023
* WECC Board of Directors June 14, 2023
* NERC Board of Trustees Targeted for May 2024
* FERC Pending

## Effective Date

The first day of the second quarter following regulatory approval of FAC-501-WECC-4, Transmission Maintenance plus approval of the Table Revision Process.

## Justification of Effective Date

On December 8, 2021, the WECC Board of Directors (Board) approved WECC-0141 FAC-501-WECC-3, Transmission Maintenance, with a request for approval and subsequent regulatory disposition, as needed.[[14]](#footnote-15)

On April 11, 2022, NERC informed WECC Standards staff that although NERC raised no specific concerns with WECC-0141, implementation at NERC could take an elongated period due to pre-existing NERC projects.[[15]](#footnote-16)

To remedy the concern, NERC and WECC agreed that WECC should file a subsequent Standard Authorization Request (SAR)(WECC-0149) shifting the implementation burden away from NERC to WECC.

## Impact on Reliability

Proposed changes have been fully vetted using the Procedures as well as peripheral ad hoc engagement of subject matter experts performed as part of WECC-0141. No reliability concerns were raised during either process.

## Impact on Other Standards

If approved, the following documents will be impacted in that they incorporate the Table by reference:

1. FAC-003-4, Transmission Vegetation Management referencing the “Major WECC Transfer Path in the Bulk Electric System by WECC”;
2. FAC-501-WECC-4, Transmission Maintenance referencing the “Major Paths Revision Process, Attachment A, Major WECC Transfer Paths in the Bulk Electric System.”
3. PRC-023-4, Transmission Relay Loadability referencing a “major transfer path within the Western Interconnection as defined by the Regional Entity”; and,
4. The NERC Glossary of Terms Used in Reliability Standards referencing a “major transfer path within the Western Interconnection.”

Although impacted by virtue of incorporation by reference, the DT concluded that the proposed Table Revision Process and proposed FAC-501-WECC-4 should have no impact on implementation of the aforementioned documents, except that the location of the Table has changed.

**Consideration of Early Compliance**

As to FAC-501-WECC-4, the drafting team sees no concerns with early compliance within the Western Interconnection. As mentioned above, changes to the Table were vetted in multiple postings (WECC-0141/WECC-149) as well as peripheral ad hoc briefings with subject matter experts occurring outside of this project.

1. Original WECC-0141 documents are located here: <https://www.wecc.org/Standards/Pages/WECC-0141.aspx>).

Origin WECC-0149 documents are located here: <https://www.wecc.org/Standards/pages/wecc-0149.aspx>. [↑](#footnote-ref-2)
2. See Attachment T through T-11 provided with this filing. [↑](#footnote-ref-3)
3. <https://www.wecc.org/Reliability/WECC-0141%20FAC-501-WECC%20Posting%203%20-%20%20Attachment%20F%20-%20Implementation%20Plan%20-%20To%20Tech%2002-19-2021.docx> [↑](#footnote-ref-4)
4. This project proposes removal of Path 22 - Southwest Four Corners, Path 50–Cholla Pinnacle Peak, Path 51–Southern Navajo, and Path 73–North of John Day Cutplane. [↑](#footnote-ref-5)
5. Other NERC documents potentially impacted by changes to FAC-501-WECC-2 include the following:

	1. FAC-003-4, Transmission Vegetation Management referencing the “Major WECC Transfer Path in the Bulk Electric System by WECC”;
	2. FAC-501-WECC-4, Transmission Maintenance referencing the “Major WECC Transfer Paths in the Bulk Electric System (Table).”
	3. PRC-023-4, Transmission Relay Loadability referencing a “major transfer path within the Western Interconnection as defined by the Regional Entity”; and,
	4. The NERC Glossary of Terms Used in Reliability Standards referencing a “major transfer path within the Western Interconnection.” [↑](#footnote-ref-6)
6. “The Standards Committee shall not under any circumstance change the substance of a draft or approved Reliability Standard.” NERC Rules of Procedure, Section 300—Reliability Standards Development, 306. Standards Committee. [↑](#footnote-ref-7)
7. “A nonsubstantive [sic] revision is a revision that does not change the scope, applicability, or intent of any Requirement and includes but is not limited to things such as correcting the numbering of a Requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a Requirement for improved clarity. Where there is a question as to whether a proposed modification is “substantive,” the Standards Committee shall make the final determination.” NERC Standard Processes Manual, Version 5, Effective November 28, 2023, Section 4.13: Conduct Final Ballot or Conclude the Standards Action [↑](#footnote-ref-8)
8. NERC Standard Processes Manual, Version 5, Effective November 28, 2023Section 12.0: Process for Correcting Errata [↑](#footnote-ref-9)
9. <https://www.wecc.org/Reliability/WECC-0149%20FAC-501-WECC-4%20Trans%20Maint%20%20-%20Attachment%20F%20-%20Implementation%20Plan.docx> [↑](#footnote-ref-10)
10. To further ensure due process, APS/BPA posted their intentions on the APS/BPA Open Access Same-time Information System (OATI) announcing the proposed removal of the paths from the WECC Path Rating Catalog. The catalog owner approved APS’s request to remove Paths 22, 50, and 51 with an effective date of January 1, 2020. BPA’s request to remove Path 73 was approved for May 12, 2021. [↑](#footnote-ref-11)
11. “As used herein, Path Name is used as a proper noun referring to the as-approved FAC-501-WECC-2, Attachment B, column heading “Path Name.” Path Name is not included in the NERC Glossary of Terms Used in Reliability Standards. Although the reliability reasons for inclusion in Attachment B could not be found, WECC’s Reliability Management System Criteria Agreement, Annex A provides some evidence as to why the paths were included. At Annex A, the Definitions section indicates that the paths included in Table 2 (later known as Attachment B) are “those transfer paths monitored by the WECC regional Reliability Coordinators.” The earliest versions use the term “Security Coordinator” as opposed to Reliability Coordinator. [↑](#footnote-ref-12)
12. Version Zero documents refer to those standards first accepted as NERC Reliability Standards (Docket No. RR07-11-000, July 2007; see also Docket No. RM09-9-000, December 2010). For purposes of this project, standard’s nomenclature from 2007 to date is sequentially PRC-STD-005-1, FAC-501-WECC-1, and FAC-501-WECC-2, all of which have the same name: Transmission Maintenance. [↑](#footnote-ref-13)
13. Because the proposed remedy would “not change the scope or intent of” FAC-003-4, and would have “no material impact on the end users of the Reliability Standard” implementation of a title change and/or importation of content may be covered by the errata authority offered to the NERC Standards Committee per NERC Rules of Procedure, Section 12.0: Process for Correcting Errata. [↑](#footnote-ref-14)
14. Step 11, Obtain Board Approval, WECC Reliability Standards Development Procedures. [↑](#footnote-ref-15)
15. For example, due to pre-existing NERC projects, NERC/FERC approval to retire the WECC Regional Variance from WECC-0113 FAC-010/011 did not occur until six years after Board approval. [↑](#footnote-ref-16)