# Project Goal

The goal of this combined filing is to provide the procedurally mandated five-year review of FAC-501-WECC-2, Transmission Maintenance (WECC-0141/Standard)[[1]](#footnote-1), and to create a FERC-approved single-source Table Revision Process (WECC-0149/Process)[[2]](#footnote-2) enhancing the change process for listing paths on the WECC Major Paths in the Bulk Electric System (Table). Enhancements provided by the Process are designed to minimize existing due process concerns arising from incorporating the Table by reference into multiple NERC documents.

# Supporting Documents – Designation and Origin

Supporting document file names are sequentially designated as “Attachment T” (T1-T11) and are provided to NERC as part of this filing.

The full text of the technical information provided by Arizona Public Service (APS) and Bonneville Power Administration (BPA) during this project has been provided to NERC for quaternary technical scrutiny.[[3]](#footnote-3)

Supporting documents were largely created by APS/BPA in their efforts to remove specified paths from the WECC Path Rating Catalogue (Catalogue), followed by removal from the Table in the FAC-501-WECC-X Standard. Most paths listed in the Catalogue are also listed in the Table.

Changes to the Catalogue are governed by the WECC Project Coordination, Path Rating, and Progress Report Processes (Combined Processes). [[4]](#footnote-4) Changes to the Table are currently governed by the WECC Reliability Standards Development Procedures (Procedures).

# Background

After completing technical studies required to remove specified paths from the Catalogue, APS and BPA concluded that delisting certain paths from the Catalogue *and* the Table would have no negative impact on reliability.

Following permission to delist specified paths from the Catalogue, APS/BPA sought to use the Combined Processes documents to support their requests for delisting the same paths from the Table.

On December 19, 2019, APS filed WECC-0141 requesting removal of three specified paths from the Table.[[5]](#footnote-5) During WECC-0141, Posting 6, BPA added a request to have its single path removed from the Table, only after receiving approval to remove its path from the Catalogue. Although belated in arrival, BPA’s request was within the scope of the WECC-0141 SAR.

WECC-0141 was augmented by WECC-0149 (Table Revision Process) with the goal of expediting implementation of WECC-0141, and to ameliorate concerns over incorporating the Table by reference into multiple other NERC documents.

Per the Combined Processes, multiple WECC technical committees approved removal of the specified paths from the Catalogue. Following that result, two WECC Ballot Pools approved removal of the same paths from the Table, by a 100% affirmative ballot.

# Comparing Processes

For a snapshot comparison of the Procedures/Combined Processes/Table Revision Process, see Attachment 1.

Although similar to the Procedures, the Combined Processes are superior to the Procedures in that the Combined Processes require specific technical studies and specific due process not otherwise specified in the Procedures. In drafting the Table Revision Process, the drafting team endeavored to create a superior hybrid using the best features of the Procedures as well as the Combined Processes.

# Technical Support Provided – Arizona Public Service (APS)

APS successfully followed the Combined Processes (and later the Procedures) when delisting its three paths from the WECC Path Rating Catalogue. What follows is a snapshot of the actions and technical support used in support of those endeavors.

In accordance with the Combined Processes, APA first distilled the actions it would take.[[6]](#footnote-6)

On August 21, 2019, APS made a presentation to the Southwest Area Transmission Oversite Group regarding its proposed delisting.[[7]](#footnote-7) The content of the presentation would largely be reiterated in a letter to various WECC committees dated September 3, 2019.

The September 3, 2019, letter was sent by APS to the WECC Studies Subcommittee (StS) Chair, WECC Operating Committee (OC) Members, and the WECC Reliability Assessment Committee (RAC) notifying those parties of APS’ intent to delist WECC Paths 22, 23, 50, 51 from the WECC Path Rating Catalogue with an effective date of January 1, 2020.[[8]](#footnote-8) Further, additional notice was provided stating APS would present its proposal to impacted parties on September 17, 2019.

In the same letter, APS stated its primary driver for delisting as “the inability to maintain existing WECC Path ratings with planned coal retirements and the difficulty in the WECC Path rating process for timely rating changes.” The letter stated that APS had conducted the necessary studies “confirming reliable system operations after the coal units are retired.”

APS informed the members that delisting had been coordinated with and approved by the join path owners, and provided a listing of dates and parties with which communications had been made, including notification provided via the Open Access Transmission, Inc. (OATI) website on August 15, 2019. APS agreed to provide the required 30-day notice and associated comment/response closing October 17, 2019. APS corporate contact information was also provided.

On October 18, 2019, APS presented its request to the WECC Reliability Assessment Committee (RAC).[[9]](#footnote-9) The presentation included: 1) discussion of the primary reasons for seeking the delisting, 2) impacts on current planning and procedures, 3) communication with impacted parties, and 4) proposed steps forward to include SAR WECC-0141. As required in the Combined Processes, the issue was opened for public discussion and debate.

On September 15, 2021, in response to questions posed by FERC to APS (prompted by APS’ Southwest Area Transmission Oversight Group presentation), APS responded in letter form to address FERC’s questions regarding the delisting of WECC Paths 22, 23, 50, and 51.[[10]](#footnote-10)

FERC queried and APS answered regarding APS’ study assumptions, conclusions, independent third-party review, and any known criteria explaining why specific paths were added to Attachment B of FAC-501-WECC-2.

After completing the steps required to delist its paths from the Catalogue, six postings in WECC-0141, and two posting in WECC-0149, the industry agreed by two 100% affirmative ballots that APS’ paths should also be deleted from the Table.

# Technical Support Provided – Bonneville Power Administration

BPA successfully followed the Combined Processes (and later the Procedures) when delisting its path from the WECC Path Rating Catalogue. What follows is a snapshot of the actions and technical support used in support of those endeavors.

On December 15, 2020, BPA dispatched notice to WECC members, as required in the Combined Processes, providing notice of its intent to delist Path 73, North of John Day. Notice was accompanied by a technical proposal (North of John Day Retirement Report), initiation of a comment/response cycle, with a projected delisting date of January 15, 2021.[[11]](#footnote-11)

On May 12, 2021, BPA dispatched notice that North of John Day had been retired. Notice included a list of documents that had been updated resulting from that retirement.[[12]](#footnote-12)

On June 15, 2021, BPA dispatched notice via OATI of BPA’s intent to delist North of John Day, noting that North of John Day had been retired as of May 12, 2021.[[13]](#footnote-13)

On February 16, 2022, BPA informed W. Shannon Black, WECC Consultant, Standards Processes, as to the details behind BPA’s proposal to delist/remove North of John Day, Path 73 from FAC-501-WECC-2, Transmission Maintenance. BPA’s response is summarized below:

On July 6, 2021, WECC submitted a request to provide additional information on how BPA made the determination to delist North of John Day (Path 73) from the WECC Path Rating Catalog. WECC directed three specific questions to BPA, and BPA offers these responses. BPA was asked and answered provided information regarding the Background of BPA’s decision, what led to the determination to delist, and steps taken this far to achieve that goal, modeling assumptions and methods, and provision of supporting illustrations.[[14]](#footnote-14)

*A detailed explanation in support of retiring BPA’s John Day was presented in the North of John Day Path Retirement presentation from BPA Operations Planning, December 2020.[[15]](#footnote-15) (Emphasis added.)*

**Appendix 1**

**Procedures Compared**

|  |  |  |
| --- | --- | --- |
| **Procedures** | **Catalogue / Combined Processes** | **Proposed Table Revision Process** |
| Mandatory | Voluntary | Mandatory |
| Does not address incorporation by reference | Does not address incorporation by reference | Creates a single location for the Table referenced in any NERC/FERC approved document |
| Processes are changed per the Procedures. | Processes are changed be WECC committees. | Processes are changed per the Procedures as approved by FERC.  Content is changed per the Table Revision Process as approved by the WECC Board of Directors. |
| FERC jurisdictional | The path owner is responsible for ensuring the path rating meets WECC/NERC/FERC requirements[[16]](#footnote-16); not intended to support “regulatory proceedings”[[17]](#footnote-17) | FERC jurisdictional for the Table Revision Process.  WECC Board approved content. |
| Defers to the technical expertise of the Standards drafting team[[18]](#footnote-18); does not specify what must be studied | Specifies minimum acceptable technical studies[[19]](#footnote-19); technical transfer capabilities based on technical limits from system planning studies  “Items to be included in the delisting notice and presentation are provided below.  a. A description of the WECC Path that is under consideration for delisting,  b. A description of the circumstances driving the request for delisting,  c. A summary of any relevant study work related to the delisting,  d. The proposed effective date for the delisting (which must be at least three months after the date of the notice),  e. A summary of any entities the delisting has been discussed with or coordinated with including a summary of key dates, discussions, and decisions,  f. Contact information for entities to provide comments related to WECC Path delisting. (Combined Processes, Step 7.) | Requires a technical study to change the content.  The Table Revision Process requires narrative studies to include: 1) path ID, 2) why the change is requested, 3) conclusions, methodologies, and impacts of studies completed, 4) maintenance practices, 5) an implementation plan, 6) report on other impacted Standards, 7) effective date, and 8) contact information. |
| Specifies *generic* notice (due process) | Specifies *specific* entities that must be included in the process[[20]](#footnote-20). | Specifies *specific* and *generic* notice to entities that must be included in the process including the Transmission Owner/Operator, and the Reliability Coordinator. |
| Requires less than unanimous approval | Requires unanimous agreement by all path owners to delist their path | WECC Board of Director approval for content change. |
| 30-day comment/response | 30-day comment/response | 30-day comment/response |
| Standards Briefing prior to ballot | Presentation to various committees | Presentation to the WECC Reliability Risk Committee (RRC) and the Board |
| Requires a ballot | Requires committee approval | Requires ballot at the RRC |
| WECC/NERC/FERC approval | Committee approval | Committee and Board approval, followed by NERC/FERC informational filing. |
| No iterative ballot allowed |  | Iterative ballot allowed |

1. WECC-0141 FAC-501-WECC-2, Transmission Maintenance, Five-year review, addressing the Standard’s content. [↑](#footnote-ref-1)
2. WECC-0149 Table Revision Process (Process), addressing the Table’s location, and the proposed process whereby the content of the Table may be modified. [↑](#footnote-ref-2)
3. This information has been reviewed by various WECC technical committees plus twice more in the two WECC Ballot Pools of WECC-0141 and WECC-0149. [↑](#footnote-ref-3)
4. The Combined Processes are under the auspice of the WECC Studies Subcommittee (StS), overseen by the Reliability Assessment Committee (RAC), or its successor. The Combined Processes provide procedures for WECC members: 1) to delist a path from the Catalogue (Combined Processes, Section 7, Path Delisting), 2) to coordinate the expansion of the Western Interconnection; 3) to provide notice to specific parties and committees, including the parameters and technical content of that notice; and, 4) to abide by an agreed upon method for assignment and study of transfer capability of transmission facilities.(Combined Processes, page 4-6)

   <https://www.wecc.org/_layouts/15/WopiFrame.aspx?sourcedoc=/Reliability/Project%20Coordination%20Path%20Rating%20and%20Progress%20Report%20Processes_Approved.pdf&action=default&DefaultItemOpen=1> [↑](#footnote-ref-4)
5. Paths approved for delisting from the Catalogue include: 1) Southwest Four Corners (Path 22), 2) Cholla Pinnacle Peak (Path 50), and 3) Southern Navajo Transmission System (Path 51). Also delisted but not included in Table is Four Corners 345/500, (Path 23). [↑](#footnote-ref-5)
6. WECC-0141 FAC-501-WECC-3 Trans Maint – Attachment T1 – Additional Supporting Documents – APS Internal Delisting Process [↑](#footnote-ref-6)
7. WECC-0141 FAC-501-WECC-3 Trans Maint - Attachment T5 - Additional Supporting Documents - APS SWAT Meeting 08-21-2019 [↑](#footnote-ref-7)
8. WECC-0141 FAC-501-WECC-3 Trans Maint - Attachment T3 - Additional Supporting Documents - APS Letter 1 Notification to WECC 09-03-0219 [↑](#footnote-ref-8)
9. WECC-0141 FAC-501-WECC-3 Trans Maint - Attachment T2 - Additional Supporting Documents - APS RAC Meeting 10-18-2019 [↑](#footnote-ref-9)
10. WECC-0141 FAC-501-WECC-3 Trans Maint - Attachment T4 - Additional Supporting Documents - APS Letter 2 to FERC 09-15-2021 [↑](#footnote-ref-10)
11. WECC-0141 FAC-501-WECC-3 Trans Maint - Attachment T8 - Additional Supporting Documents - BPA Notice of Intent to Delist 01-15-2021 [↑](#footnote-ref-11)
12. WECC-0141 FAC-501-WECC-3 Trans Maint - Attachment T10 - Additional Supporting Documents - BPA Notice of Completion 05-12-2021 [↑](#footnote-ref-12)
13. WECC-0141 FAC-501-WECC-3 Trans Maint - Attachment T9 - Additional Supporting Documents - BPA Notice of Delisting OASIS 05-2021 [↑](#footnote-ref-13)
14. WECC-0141 FAC-501-WECC-3 Trans Maint - Attachment T6 - Additional Supporting Documents - BPA Response to WECC - Email 02-16-2022 [↑](#footnote-ref-14)
15. WECC-0141 FAC-501-WECC-3 Trans Maint - Attachment T7 - Additional Supporting Documents - BPA No. Of John Day Delist Report 12-2020 [↑](#footnote-ref-15)
16. Combined Processes, Section 5, Phase 2 Accepted Rating Comprehensive Study Plan, Study Objectives, 5.2.1. Satisfy Reliability Criteria: “In establishing an Accepted Rating for an existing Path or for a Path with a new Project, the Project Sponsor [AKA: Path Owner] is responsible for assuring that the Accepted Rating complies with NERC Reliability Standards, WECC Criteria, and requirements in this document.” [↑](#footnote-ref-16)
17. Catalogue, Purpose, page 3. [↑](#footnote-ref-17)
18. FERC Order 672, C. Reliability Standards, page 19. [↑](#footnote-ref-18)
19. Catalogue, Path Descriptions, page 3. See also Catalogue, Document Update Policy, page 4, “Paths can be removed from the catalog by following the [WECC] Process defined in Section 7.0 (page 56).” See also Project Coordination, Path Rating, and Progress Report Processes - Studies Subcommittee (StS), July 2022 <https://www.wecc.org/Reliability/Project%20Coordination%20Path%20Rating%20and%20Progress%20Report%20Processes_Approved.pdf> [↑](#footnote-ref-19)
20. Catalogue, Document Update Policy, page 4. [↑](#footnote-ref-20)