



# Future of the WECC Project Coordination, Path Rating, and Progress Report Processes

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WECC has been the home of the Project Coordination, Path Rating, and Progress Report processes for many years. Several changes have occurred in the electric power industry that have caused WECC to examine the value these processes provide and whether they should remain WECC-owned processes in the future.

## Context – WECC’s Reliability Focus

WECC's stated mission is to effectively and efficiently mitigate risks to the reliability and security of the Western Interconnection's Bulk Power System. Reliability risks in the Western Interconnection have increased – and are continuing to increase – in severity and frequency, requiring NERC and the Regional Entities to increase focus on these risks to stay on top of them.

WECC's Long-term Strategy describes how WECC meets its reliability mission through its independence, perspective, and partnership. WECC relies on these three pillars to guide its work. The Long-term Strategy specifically states that WECC focuses its resources on risks that pose the greatest threat to the reliability and security of the Western Interconnection’s Bulk Power System (BPS).

In addition to focusing on risks that pose the greatest threat, NERC’s Rules of Procedure and WECC's Delegation Agreement require Regional Entities like WECC to be responsible for specific delegated functions. Some of these delegated functions include oversight, situation awareness, event analysis, performance analysis, and reliability assessments. WECC also serves as the MOD-032 Designated Entity for building power flow planning models for planners in the Western Interconnection. WECC is responsible for these delegated functions and is expected to deliver on them with excellence.

Therefore, WECC's primary reliability focus is twofold: WECC must focus its time and energy on:

1. Risks that pose the greatest threat to the reliability and security of the Western Interconnection’s BPS
2. Specific delegated function responsibilities

Because of the reliability challenges facing the industry today, WECC is examining its work, processes, and the initiatives with which it is involved to ensure that these responsibilities are aligned with its reliability mission, Long-term Strategy, and a strict interpretation of its delegated responsibilities. The current reliability landscape does not allow WECC to invest its resources in matters that veer from this twofold focus.

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## Project Coordination, Path Rating, and Progress Report Process

WECC has been the home of the Project Coordination, Path Rating, and Progress Report Process for decades, long before the NERC Reliability Standards or the Regional Planning groups came into being. This process originated back when WSCC (now WECC) was a trade association and its board of directors was composed of utility company executives in the Western Interconnection. As a trade association, WECC focused on matters that were of interest to its members. Fairness and equity in business aspects of transmission expansion was of critical importance to the WECC board of directors, leading to the development of the [Project Coordination, Path Rating, and Progress Report Process](#). This process was originally created as three separate processes to ensure those interests were preserved in a manner that supported transparency and coordination in the West. Eventually, these three processes were rolled into a single process document.

The Project Coordination, Path Rating, and Progress Report Process is a voluntary process that (per the document):

1. Provides procedures for WECC members and others to report on planned projects and to work together to expand the capacity of the Western Interconnection according to member and stakeholder needs
2. Provides an opportunity to be informed of regional transmission planning conducted by the Transmission Planning Regions and others
3. Provides project sponsors with an industry-agreed upon procedure that, when completed, could potentially be used to help demonstrate that coordinated planning has been performed for proposed projects, as may be required to obtain required regulatory approvals
4. Provides the policies and procedures for notification and reliability assessment requirements related to projects proposed and planned within the Western Interconnection
5. Provides agreed upon methods applicable to the transfer capability of transmission facilities (e.g., path flow ratings)
6. Promotes the reliable and coordinated integration of existing and new projects so that the use of the system is maximized for all participants<sup>1</sup>

While aspects of the Project Coordination, Path Rating, and Progress Report Process are related to preserving reliability, the primary objective, as described in the document, is to coordinate transmission buildouts and infrastructure changes that can have an impact on neighboring systems, with an emphasis on ensuring that transmission changes in one area of the system do not affect other transmission owners' ability to transfer power. As stated in the Path Task Force report dated January 31, 2023, the primary goal of an "Accepted Rating" is to provide some degree of protection to entities that have made investments in the transmission system.

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<sup>1</sup> Project Coordination, Path Rating, and Progress Report Process, July 2022, page 5.

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## Industry Changes

Several major industry changes have occurred since the inception of this process:

1. The creation and enforcement of mandatory Reliability Standards, including TPL standards that contain requirements for transmission planning reliability.
2. MOD standards that govern determination of Total Transfer Capability (TTC), and Available Transfer Capability (ATC) were removed from the body of NERC Reliability Standards and added to NAESB Business Practice Standard WEQ-023. The rationale for this change was that TTC/ATC matters were determined to be a business practice construct and not a reliability matter.
3. WECC's Path Task Force published a [report](#) on January 31, 2023, stating that Path Ratings can be considered long-term TTC values established for the planning horizon.<sup>2</sup>
4. In 2014, WECC transitioned from a 501(c)(6) trade association that focused on promoting common business interests of its members to a 501(c)(4) social welfare organization that focuses on promoting the common good and general welfare of the community.
5. Regional planning entities were established in response to FERC Order 1000 whose responsibilities include coordination of transmission expansion within the region. Subsequent FERC Order 1920 further specified Transmission Planning Region coordination responsibilities. Each utility's Open Access Transmission Tariff (OATT) contains a mandatory section that describes the transmission planning process, incorporating regional, local, and subregional planning activities in compliance with FERC Orders 890 and 1000. It ensures that transmission planning is open, transparent, coordinated, and non-discriminatory, covering everything from load forecasting to the selection of projects for regional cost allocation.
6. Some entities in the Western Interconnection have moved away from Paths in favor of flowgate approaches that do not use Paths.
7. The Path Task Force considered how markets in the West would likely affect the use of WECC Paths in the future and concluded that Path Ratings would have no purpose or function in a market environment. The January 31, 2023, Path Task Force report states, "It is reasonable to consider that these future developments [emerging markets] in the West may not use a path-based approach but might rely on a flow-based approach."<sup>3</sup>
8. Refer to the Path Task Force Report for additional industry changes that affect the use of WECC Paths and Path Ratings in the Western Interconnection.

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<sup>2</sup> Path Task Force Report, January 31, 2023, page 4

<sup>3</sup> Path Task Force Report, January 31, 2023, page 5

## Analysis

Though the Project Coordination, Path Rating, and Progress Report processes are compiled within a single document and are often referred to collectively, each component is a distinct process that must be examined independently.

### Project Coordination Process and the Progress Report Process

Together, the Project Coordination Process and the Progress Report Process replicate functions that are already mandatory under FERC Orders 1000 and 1920, governed through utility OATT transmission planning processes. A review of sample utility OATTs describing the required activities for local, regional, and interregional transmission planning coordination, collaboration, and stakeholder input confirmed that WECC's Project Coordination Process and Progress Report Process are redundant and unnecessary.

### Path Rating Process

Portions of the Path Rating Process address coordination among affected entities related to transmission expansion, much of which is already contained within the regional transmission planning process described above. The remaining elements of the Path Rating Process address total transfer capability (TTC) (i.e., Path Rating) calculation for the planning horizon as well as protection of transmission investments and transmission rights. These elements are primarily business practices and business-related matters, and only tangentially related to system reliability.

WECC acknowledges that TTC (i.e., Path Rating) calculations for the planning horizon and transmission investment and rights protection are important business considerations for utilities and other transmission entities. However, WECC concludes that the Path Ratings Process:

- Does not clearly fall within a strict interpretation of WECC's delegated functions
- Is not focused on addressing the risks that pose the greatest threat to the reliability and security of the Western Interconnection's Bulk Power System
- Is inconsistent with WECC's reliability mission and long-term strategy

## Conclusion

WECC has determined that the Project Coordination, Path Rating, and Progress Report processes should no longer exist as WECC processes. Accordingly, WECC will retire them in the near future. Because the Path Rating Process is regarded as an important business matter for transmission entities in the West, WECC is open to having discussions about transferring the Path Rating Process to another forum.