

# **Table Revision Process**

#### A. Introduction

1. Title: Major¹ WECC Transfer Paths in the Bulk Electric System (Table)—Path List

**Revision Process (Revision Process)** 

2. Number: NOT APPLICABLE. THIS IS NOT A WECC/NERC STANDARD.

**3. Purpose:** The purpose of this document is to: a) create the process whereby the content of

the Table can be revised outside of the WECC Reliability Standards

Development Procedures (Procedures), and b) create the sole source listing of

the Table's content for all documents in which the Table is referenced.<sup>2</sup>

#### 4. Applicability

**4.1.** Transmission Owner(s), Transmission Operator(s), and Reliability

Coordinator(s), operating in the Western Interconnection (AKA: Requesting

Entity<sup>3</sup>)

<sup>&</sup>lt;sup>1</sup> For purposes of this document and those documents specified herein, the word "major" is used only as a title and not as an adjective. Its legacy use as a title does not indicate the importance of the path or its impact on reliability. As used, the word is a carryover from WECC's Reliability Management System (RMS), circa 1997, wherein its use designated those paths monitored by the "Security Coordinator" — predecessor of the Reliability Coordinator. Beyond this feature found in the RMS there are no known technical studies explaining why the specified paths are listed in the Table.

<sup>&</sup>lt;sup>2</sup> This foot note should be included in the next iteration of this document.

<sup>&</sup>quot;To ensure that the informational filings submitted by WECC to the Commission after making changes to the Table will contain sufficient information for Commission review, we direct WECC to include, at a minimum, the following: (1) the circumstances triggering the addition, modification, or removal of a path from the Table, (2) the technical justification supporting the addition, modification, or removal of a path from the Table, and (3) what impact the change may have on the Reliable Operation of the Bulk-Power System." FERC Order Approving, Footnote 28, RD24-7-000, 188 FERC ¶ 61,214, P17, September 24, 2024.

<sup>&</sup>lt;sup>3</sup> The Reliability Coordinator may serve as the Requesting Entity on behalf of any entity not listed in Section 4. Applicability. For example, if a Generator Owner seeks to add a path to the Table, the Generator Owner is required to make that request through the Reliability Coordinator that oversees the path. The Reliability Coordinator may accept or reject the request, subject to appeal to WECC Director of Standards (DOS).

#### 5. Documents

- 5.1 This Table Revision Process applies to any NERC/WECC document specifically referencing the Table as the "Major WECC Transfer Paths in the Bulk Electric System."
- 5.2 This Table Revision Process also applies to those documents listed below in which a derivation of the Table title is used, as approved by FERC. Applicability to those documents shall continue so long as the Table continues to be referenced therein.

Because the Table and its content originated circa 1997, the Table has been referenced in various documents under various derivations of the current Table's title. To ensure inclusion of specifically referenced documents as well as documents in which a derivation of the Table's title is used, this Table Revision Process is specifically applicable to 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)."
- 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."

After the effective date of this document, new derivations of the Table's title will not be recognized.

If a document not specified above contains a derivation of the Table's title and the document owner wishes to incorporate the Table by reference, the document owner shall change its document to include the specific title of the Table used herein.

**6. 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.

## B. Process Requirements

**R1.** Each Requesting Entity seeking to modify the content of the Table shall complete a technical study that includes, at a minimum, each of the following:



- **1.1.** A description of the path to be added, removed, or modified from the Table.
- **1.2.** A description of the circumstances triggering the requested change.
- **1.3.** A description of the study method used in support of the requested change.
- **1.4.** A description of the conclusions and impacts disclosed by the technical study.
- **1.5.** A description of maintenance practices applicable to the path at the time of the request, and a description of the maintenance practices that would apply if the path were removed from the Table.
- **1.6.** An implementation plan.
- **1.7.** A report on enforceable NERC Standards that may be impacted by the requested change.
  - **1.7.1.** If a review of enforceable NERC Standards shows that accepting a change to the Table will have no impact on other Standards, a statement to that effect meets this requirement.
  - **1.7.2.** If a review of enforceable NERC Standards shows that accepting a change to the Table will impact other Standards, proposed remediation shall be included in the Requesting Entity's implementation plan. The implementation plan shall also state the specific Standards or other documents impacted by the proposed change.
- **1.8.** The proposed effective date for the requested change, subject to required approval.
  - **1.8.1.** The actual effective date shall be the latter of the proposed effective date or the first day of the second quarter following FERC's acceptance of the required informational filing. (See Section C. Required Approvals.)<sup>4</sup>
- **1.9.** Contact information identifying the Requesting Entity's subject-matter expert having oversight for proposed changes to the Table.

<sup>&</sup>lt;sup>4</sup> This foot note is to be removed when this document is revised. "Requirement R1.8 of the proposed Table Revision Process states that the effective date of any change to the Table "shall be the latter of the proposed effective date or the first day of the second quarter following FERC's acceptance of the required informational filing." Joint Petition, attach. C-2 at 3. Because informational filings do not require Commission action or response, we understand Requirement R1.8's statement regarding the date of "FERC's acceptance of the required informational filing" to refer to the date on which the informational filing would be considered "filed" according to our regulations. See 18 C.F.R. § 385.2001(a)(2) (2024). We encourage WECC to revise this language when and should WECC revisit the Table Revision Process in the future." FERC Order Approving, Footnote 28, RD24-7-000, 188 FERC ¶ 61,214, September 24, 2024.



- **R2.** Each Requesting Entity shall, at a minimum, provide *specific* notice of the proposed change to the following entities, operating within the Western Interconnection:
  - **2.1.** Each Transmission Owner that owns and/or maintains the identified path;
  - **2.2.** Each Transmission Operator that operates the identified path;
  - **2.3.** Each Reliability Coordinator having oversight of the identified path.
- **R3.** Each Requesting Entity shall provide *generic* notice of the proposed change to the following entities:
  - **3.1.** Those entities subscribed to WECC's Standard Email List, or its successor (as created per Procedures, or its successor).
- **R4.** Each Requesting Entity shall, at a minimum, provide the Requirement R1 technical study to the following entities within 30 days of a request for the study:
  - **4.1.** Transmission Owner(s), Transmission Operator(s), and Reliability Coordinator(s), operating in the Western Interconnection, having a reliability-related need.
  - **4.2.** The chair or chair's designee of the WECC Reliability Risk Committee (RRC), or its successor.
- **R5.** Each Requesting Entity shall, at a minimum, include the following information in the notice required in R2 and R3 above:
  - **5.1.** Notice specifying the proposed change to the Table.
  - **5.2.** A request for comments addressing the proposed change.
    - **5.2.1.** The request for comments window shall allow for a minimum of one 30-day comment period during which comments regarding the requested change shall be received, considered, and addressed by the Requesting Entity. Additional comment/response cycles are allowed, as needed.
  - **5.3.** The location of the Requirement R1 technical study or information regarding how to obtain the study.
  - **5.4.** How to submit comments to the Requesting Entity regarding the proposed change.
  - 5.5. The opening and closing dates during which the solicited action shall take place. Unless otherwise posted, all posting periods close at 6:00 p.m. (Mountain).



- 5.6 Contact information for the Requesting Entity's subject matter expert covering the requested change to the Table.
- **R6.** Each Requesting Entity shall consider all comments received during each 30-day posting.
  - **6.1.** If the same comment is received more than once, the Requesting Entity may provide a single response to all comments that raise the same or a similar concern.
  - **6.2.** If the same comment is received in iterative postings, the Requesting Entity is not obligated to respond to comments previously addressed.
- **R7.** Each Requesting Entity shall prepare a response to comments received for each posting. Responses shall include, but not be limited to:
  - **7.1.** Reporting any changes made in response to comments received.
  - **7.2.** A narrative explaining why the Requesting Entity did not accept recommendations proposed by commenters during the comment/response cycle(s).
- **R8.** At the close of the final comment/response cycle(s), each Requesting Entity shall present to the RRC, the entity's findings and recommendations regarding proposed changes to the Table.
- **R9.** At the close of the Requesting Entity's presentation required in Requirement R8, the RRC shall conduct a ballot to determine whether the Requesting Entity's proposed change(s) should be adopted. Balloting rules shall be those established by the RRC.
  - Primary Ballot
  - **9.1.** If the Requirement R9 ballot succeeds:
    - **9.1.1.** The RRC chair shall present its findings to the WECC Board of Directors (Board) with a request for disposition. The RRC chair shall make its presentation at the next regularly scheduled Board meeting, subject to the needs and requirements of the Board.
    - **9.1.2.** If the Board approves the requested changes, an information-only filing will be made with NERC and FERC reflecting the action taken. No further procedural disposition is required.

#### Remedial Ballot

- **9.2.** If the Requirement R9 ballot fails, the Requesting Entity may either:
  - **9.2.1.** Instruct the RRC chair to withdraw the request with no further action; or,



- **9.2.2.** Request an opportunity to address outstanding objections followed by a remedial ballot.
- **9.3.** At the discretion of the RRC chair, the remedial ballot shall either be immediately following the Requesting Entity's remedial presentation at the RRC, or at a later date set by the RRC chair. The later date shall not exceed six months from the date of the original ballot.
- **9.4.** The Requesting Entity is allowed no more than two ballots to obtain approval for the requested change. If the remedial ballot fails, the original request will be deemed to have failed and the Requesting Entity shall start this process anew.
- **9.5.** The Requesting Entity may submit a new request, based on the production of new evidence.
  - **9.5.1.** The RRC shall determine whether the new evidence warrants proceeding with a new request.
- **R10.** Procedural concerns, if any, shall be directed to WECC's Director of Standards (DOS). The DOS shall have 14 days to address the concerns. The decision of the DOS may be appealed to the Board. The Board's decision is final.
- **R11.** Substantive concerns, if any, may be raised at any step in this process, including but not limited to a) the comment/response period(s), b) directly to the RRC, and c) directly to the Board, subject to the needs and requirements of the Board.
  - **11.1.** Substantive concerns may be raised to the Board even though the request has been approved at the RRC.
  - **11.2.** Failure to obtain approval from the Board does not preclude requesting the same changes in a subsequent proceeding, subject to production of new evidence.

### C. Required Approvals

Changes made to the *Table* require approval of the Board, followed by an informational filing with NERC and FERC. No further disposition is required.

Changes to this *Revision Process* require approval of the Board, the NERC Board of Trustees, and FERC.



#### D. Background and Guidance Section

#### Overview

Paths once deemed essential to stability may no longer be essential as changes are made to the operation, planning, and configuration of the Bulk Electric System. As such, those paths and the equipment comprising those paths may be considered for deletion from the Table.

Conversely, where system changes warrant a more stringent level of maintenance on specific equipment, the associated path(s) may be considered for addition to the Table.

#### **Background**

In July and August of 1996, the Western Interconnection experienced two widespread outages resulting from inadequate vegetation management. In March 1997, the Western Systems Coordinating Council (WSCC) trustees created the WSCC Reliability Management System (RMS) Policy Group establishing a remedial contract-based operational agreement known as the RMS. Although the RMS was established in response to the 1996 vegetation-related outages, unlike the FAC-003-X Transmission Vegetation Management standard, neither the RMS nor those standards evolving from it had vegetation management as their primary purpose. Rather, the initial version of WECC's regional Reliability Standards were designed to address the outages collectively by continuing operational practices addressed in the RMS.<sup>5</sup>

By February 2000, the WSCC translated the RMS into what would become the first version of NERC's mandatory Reliability Standards. In that process, the list of paths contained in the 2000 RMS, Table 4 migrated from the RMS into PRC-STD-005-1 (PRC), Transmission Maintenance, Attachment A, Table 2, Existing WECC Transfer Paths (BPTP), (Revised February 2006), and was permanently replaced with FAC-501-WECC-1 and 2, Transmission Maintenance (Version 2, 2018).

The addition of this Process is intended to provide a streamlined development procedure for adding, removing, or modifying paths listed on the Table. Specific equipment comprising a path can be identified in the required technical study and request.

Special Note: Although the content of the Table and the WECC Path Rating Catalog (Catalog) are similar, changes made to either document are governed by two separate processes. Changes to the Table are governed by this Process. Changes made to the Catalog are governed by processes outside of

<sup>&</sup>lt;sup>5</sup> The initial version of WECC's regional Reliability Standards were colloquially referred to as Version Zero standards. Version Zero is not a term used in the NERC Glossary of Terms Used in Reliability Standards. (See Docket No. RR07-11-000, July 2007).



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this document.<sup>6</sup> A change made to the Table does not make a change to the Catalog. A change made to the Catalog does not make a change to the Table.

<sup>&</sup>lt;sup>6</sup> Since 1998 or earlier, changes to the WECC Path Rating Catalog have been governed by the WECC Project Coordination and Path Rating Processes (PRP).



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

PATH NAME	Path Number
Alberta–British Columbia	1
Northwest–British Columbia	3
West of Cascades–North	4
West of Cascades–South	5
West of Hatwai	6
Montana to Northwest	8
Idaho to Northwest	14
South of Los Banos or Midway–Los Banos	15
Idaho-Sierra	16
Borah West	17
Idaho–Montana	18
Bridger West	19
Path C	20
Reserved	
PG&E-SPP	24
Northern–Southern California	26
Intmntn. Power Project DC Line	27
TOT 1A	30
TOT 2A	31
Pavant–Gonder 230 kV; Intermountain–Gonder 230 kV	32
TOT 2B	34
TOT 2C	35
TOT 3	36
TOT 5	39
SDGE-CFE	45
West of Colorado River (WOR)	46
Southern New Mexico (NM1)	47
Northern New Mexico (NM2)	48
East of the Colorado River (EOR)	49
Reserved	
Reserved	
Brownlee East	55
Lugo-Victorville 500 kV	61
Pacific DC Intertie	65
COI	66
Reserved	
Alturas	76
Montana Southeast	80
SCIT <sup>7</sup>	
COI/PDCI	

<sup>&</sup>lt;sup>7</sup> SCIT, COI/PDCI are paths operated in accordance with nomograms identified in WECC's Path Rating Catalog.



**Version History** 

Version	Date	Action	Change Tracking
1	September 26, 2024	FERC approved for January 1, 2025 effective date. RD24-7-000, 188 FERC ¶ 61,214  Developed as part of WECC-0141 and WECC-0149.	Initial Version Review Date: September 26, 2030.
Special Note:	Footnotes 2 and 4 have not been approved by FERC. They are added to this document to ensure the content of the approving FERC Order is not lost, and to ensure that content is addressed in the next iteration of this document.		

