This Standard Authorization Request (SAR) was received on May 18, 2022, and deemed complete the same day. The SAR was approved by the WECC Standards Committee (WSC) on June 14, 2022. The project was assigned WECC tracking number WECC-0149. This project augments WECC-0141, FAC-501-WECC-3, Transmission Maintenance.

# Introduction

This project is a request to augment WECC-0141, FAC-501-WECC-3, Transmission Maintenance, Attachment B, Major WECC Transfer Paths in the Bulk Electric System and its Attachment C, Revision Process.

# Requester Information

*Provide your contact information and your alternate’s contact information:*

### Primary contact

* First name: W. Shannon
* Last name: Black
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* Phone: (503) 307-5782
* Organization: WECC

### Alternate

* First name: Donovan
* Last name: Crane
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* Organization: WECC

# Type of Request

*Specify the type of request: (select one)*

* Request to augment WECC-0141 FAC-501-WECC-3, Transmission Maintenance

# Create, Change, or Retire a Document Questions

Provide information for your request to create, modify, or retire the document.

### Requested Action (select one)

* Request to augment WECC-0141 FAC-501-WECC-3, Transmission Maintenance

### Document Type (select one)

* WECC Regional Standard

### Issue

*Specify what industry problem this request is trying to resolve.*

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.[[1]](#footnote-1)

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.[[2]](#footnote-2)

To remedy the concern, NERC/WECC agreed that WECC should file a subsequent SAR shifting the implementation burden away from NERC and to WECC. Specifically, this project should alter WECC-0141 as follows:

1. Cut the contents of FAC-501-WECC-3 (Version 3), Attachment B (Table) out of WECC-0141 leaving only a reference to the title of the document wherein the paths are listed. As proposed, the Table would migrate to a free-standing Revision Process, using WECC-0141 Attachment C as the starting point. The Revision Process would be the only document across WECC/NERC in which the approved Table would reside.
2. Paste the contents of the Table into the free-standing Revision Process.
3. Cut WECC-0141, FAC-501-WECC-3, Attachment C out of WECC-0141.
4. Paste WECC-0141, FAC-501-WECC-3, Attachment C into WECC-0149 as a free-standing Revision Process. The free-standing Revision Process will serve as the only approved source listing the major paths within WECC.
5. The name for the Table would be changed:
   1. From:
      1. Version 3: FAC-501-WECC-3, Attachment B, *Path Names Identified for Transmission Maintenance and Inspection* (Emphasis added.)
   2. To:
      1. Version 4: Revision Process, Attachment A, *Major WECC Transfer Paths in the Bulk Electric System (Table)* (Emphasis added.)

**Drafting Team**

Assign the WECC-0141 Drafting Team to this task and augment the team as needed.

Although this drafting approach no longer addresses the incorporation by reference concerns corrected by WECC-0141, this approach: 1) supports the ERO Enterprise, 2) creates a single-source list of paths (Table), 3) serves multiple documents using a single revision process, and 4) speeds up removal from FAC-501-WECC-3, Attachment B those paths approved for removal in WECC-0141.

### Proposed Remedy

*Specify how this request will address the issue.*

***Supporting the ERO Enterprise***

This approach should result in an expedited removal of paths from FAC-501-WECC-3, Attachment B.

The WECC-0141 project was built on the understanding that a NERC SAR would be required to effect changes to NERC documents wherein the List was referenced. Though correct, the approach did not factor in NERC’s ongoing workload.

After discussions with NERC, WECC/NERC agreed that WECC could address the procedure for changing the Table without filing a NERC SAR. Because the contents of the Table would self-execute into WECC/NERC documents referencing the Table, the WECC-0149 approach would implement the removal of paths from the Table more quickly than asking NERC to address each NERC document directly.

***Create a Single Source List – Single Source Process***

This project would create a single source Table and a single process for changing the content of the Table.

The WECC-0149 Revision Process would be broadened to include all NERC/WECC documents wherein the Table is referenced. Where possible, the WECC-0149 Revision Process should specifically identify known NERC documents wherein the Table referenced.

WECC would not file WECC-0141 at NERC. Rather, changes approved in that project would be accepted and migrate to WECC-0149 for further augmentation.

***Reaching Multiple Documents – Expedited Implementation***

This SAR is based on the premise that WECC controls the *content* of the Table but not the NERC *documents* wherein the Table is referenced.

### Applicable Entities for FAC-501-WECC-3

* 4.1 Transmission Owners that maintain the transmission paths in Attachment B.

Version 4 would update this section to refer to the proposed Revision Process’ Table. Version 3, Attachment B would be cut out of FAC-501-WECC-3 and pasted into the Version 4 Revision Process. Version 4 would not have an Attachment B as that content would only reside in the Revision Process’ Table.

**Applicable Facilities for FAC-501-WECC-3**

* 5.1 Bulk Electric System Facilities, Elements, Transmission Lines, and other equipment as listed on Attachment A Transmission Maintenance and Inspection Plan (TMIP) Content, comprising the named paths on Attachment B, Path Names Identified for Transmission Maintenance and Inspection.

Version 4 would update this section to refer to the proposed WECC-0149 Revision Process.

### Applicable Entities for the WECC-0149 Revision Process

* Transmission Owners, Transmission Operators, and Reliability Coordinators.

### Detailed Description

(Additional background from WECC-0141)

On August 21, 2019, APS (Arizona Public Service) provided a public presentation to the Southwest Area Transmission (SWAT) Oversight group highlighting the delisting of the paths from the List. No concerns were raised by stakeholders.

On September 3, 2019, APS notified the WECC Studies Subcommittee (StS) of its intent to delist the paths from the List with an effective date of January 1, 2020.[[3]](#footnote-3)

On October 18, 2019, APS provided a presentation to the WECC Reliability Assessment Committee (RAC) summarizing the procedural background of delisting, comments received during the process, and the technical reasons why the delisting took place. To ensure due process and stakeholder inclusion, APS also posted notification on the APS Open Access Same-time Information System (OATI) announcing the pending path delisting prior to the effective date.

On December 8, 2021, the WECC Board of Directors approved WECC-0141 for NERC/FERC disposition.

On April 11, 2022, NERC/WECC agreed WECC could control the content of and process impacting the List without re-opening each impacted NERC document.

### Affected Reliability Principles

Which of the following reliability principles is MOST affected by this request? (Select one)

* **Reliability Principle 1** — *Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.*

# Document Information

*Specify the document title, document number, and affected section regarding the request.*

See above.

# Reference Uploads

*Please reference or upload any affected standards, regional business practices, criteria, policies, white papers, technical reports, or other relevant documents. If this request is based on a conflict of law, please include a copy of—or accessible reference to—the specific law or regulatory mandate in conflict.*

Referenced presentations and applicable method used for the delisting are available upon request.

### Provide additional comments (if needed).

NA

1. Step 11, Obtain Board Approval, WECC Reliability Standards Development Procedures. [↑](#footnote-ref-1)
2. 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-2)
3. Paths 22, 23, 50 and 51. Path 23 is not currently listed in Version 3, Attachment B. [↑](#footnote-ref-3)