# Table Revision Process (Process) Posting Two

**THE TABLE REVISION PROCESS (PROCESS) IS**

***NOT A STANDARD.***

***THIS PREAMBLE IS INFORMATIONAL ONLY AND NOT PROVIDED FOR COMMENT.***

**Structure**

Although the Table Revision Process (Process) resembles a Standard – it is not. As such, standardized drafting conventions are not required for this document.

The drafting team selected this format to facilitate the comment/response cycles; and, because of its familiarity to subject matter experts.

This preamble is not part of the Process. It is offered for information only and is not provided for comment. If the project is approved, this preamble will be decoupled from the Process prior to NERC/FERC filing. Its content will be used to inform the filing.

**Readability/Clarity**

Per the Flesch-Kincaid metric, this document is drafted at the 10.9 grade level.

**Filing**

This project builds on changes already approved in WECC-0141, FAC-501-WECC-3, Transmission Maintenance. [[1]](#footnote-2)

In Posting 1, three documents were posted for comment: 1) WECC-0149, FAC-501-WECC-4, Transmission Maintenance, 2) the project’s Implementation Plan, and 3) the Process. No comments were received on the Standard or the Implementation Plan. As such, no further comments are being solicited for those two documents.

 If approved, WECC-0141 and WECC-0149 will be filed jointly at NERC, along with a request for the same effective date.

For additional detail, please review the proposed Implementation Plan, posted with Posting 1.

**Changes to WECC-0141, FAC-501-WECC-3 Transmission Maintenance**

In Posting One, no comments were received regarding FAC-501-WECC-4, Transmission Maintenance. The DT does not foresee additional postings for the Standard.

**Changes to the Implementation Plan**

In Posting One, no comments were received regarding this project’s Implementation Plan. The DT does not foresee additional postings for the Implementation Plan.

**Changes to the Table Revision Process (Process)**

For a detailed description of changes made to the Process between Posting One and Posting Two, please refer to the WECC-0149 Posting 1, Response to Comments, posted on the [WECC-0149 Home Page](https://www.wecc.org/Standards/pages/wecc-0149.aspx), at the Submit and Review Comments accordion. Changes are recorded in the “Changes in Response to Comments” section. Changes not adopted are located in the “Minority View” section.

**Overview of the Proposed Process**

The purpose of the WECC-0149 Process is to codify the means to modify the content of the associated Table.

The Process is structured such that a Requesting Entity (RE) (4. Applicability) wishing to modify the content of the Table would be required to perform supporting technical studies (R1) followed by notice of the proposed change (R2, R3, R5) and production of the studies within 30 days of a request (R4). Comment/response cycle(s) would follow the notice (R6, R7).

Once the RE concludes that no further substantive changes will be made, the RE will present its findings to the Reliability Risk Committee, or its successor (RRC), (R8) where the RRC will hold a ballot to accept or reject the proposed modification (R9). Balloting rules are those applicable at the RRC (R9).

If the RRC’s ballot prevails, the project will be forwarded to the WECC Board of Directors (Board) with a request for disposition. If the ballot fails, the RE will be allowed a remedial ballot after addressing any minority positions (R9). If a second ballot fails, the project will conclude without precluding a subsequent filing, so long as new evidence is provided to the RRC (R9).

Procedural concerns are raised directly to the Director of Standards (DOS)(R10) and are appealable to the Board. Substantive concerns may be raised at any step of the proceedings (R11).

# Table Revision Process (Process) Posting Two

­**A. Introduction**

* 1. **Title: Major[[2]](#footnote-3) WECC Transfer Paths in the Bulk Electric System (Table) – Revision Process (Process)**
	2. **Number: NOT APPLICABLE. THIS IS NOT A WECC/NERC STANDARD.[[3]](#footnote-4)**
	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.

 **4. Applicability**

**4.1****.** Transmission Owner(s), Transmission Operator(s), and Reliability Coordinator(s), operating in the Western Interconnection (AKA: Requesting Entity)

**5. Documents**

**5.1** This 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 Process also applies to those documents listed in this section in which a derivation of the Table title is used, as approved by FERC. This Process continues to apply to documents listed in this section so long as the Table is referenced in those specified documents.

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 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).”
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.”

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 and approval of this 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. A description of the path to be added, removed, or modified from the Table.
	2. A description of the circumstances triggering the requested change.
	3. A description of the study method used in support of the requested change.
	4. A description of the conclusions and impacts disclosed by the technical study.
	5. A description of maintenance practices applicable to the path at the time of the request.[[4]](#footnote-6) If maintenance practices will change after a path removal, provide a description of the revised maintenance practices.
	6. An implementation plan.
	7. A report on enforceable NERC Standards that may be impacted by the requested change.
		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.
		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.
	8. The proposed effective date for the requested change, subject to required approval.
		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.)
	9. Contact information identifying the Requesting Entity’s subject-matter expert having oversight for proposed changes to the Table.

**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 toWECC’s Standard Email List, or its successor (as created per the Procedures, or its successor).

**R4.** Each Requesting Entity shall, at a minimum, provide the completed 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 for the information.

**4.2.** The chair or chair’s designee of the WECC Reliability Risk Committee (RRC), or its successor.[[5]](#footnote-7)

**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 or chair’s designee 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 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.

This document is maintained by the WECC Standards Committee (WSC), or its successor, and is subject to review each five years following the effective date.

**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.[[6]](#footnote-8)

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 this document.[[7]](#footnote-9) 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.

**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[[8]](#footnote-10) |  |
| COI/PDCI |  |

1. WECC-0141 was approved by a WECC Ballot Pool on October 21, 2021. [↑](#footnote-ref-2)
2. 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. [↑](#footnote-ref-3)
3. THIS DOCUMENT IS NOT A STANDARD. This document is not enforceable by a Compliance Enforcement Authority, meaning NERC or a Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards. [↑](#footnote-ref-4)
4. When determining the degree of detail used in R1.1.5 “description of maintenance practices,” the applicable entity should be guided by the level of detail reported in FAC-501-WECC-4, Transmission Maintenance, Attachment A, Transmission Maintenance and Inspection Plan (TMIP) Content. [↑](#footnote-ref-6)
5. Hereafter, RRC means “RRC, or its successor.” [↑](#footnote-ref-7)
6. 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). [↑](#footnote-ref-8)
7. Since 1998 or earlier, changes to the WECC Path Rating Catalog have been governed by the WECC Project Coordination and Path Rating Processes (PRP). [↑](#footnote-ref-9)
8. SCIT, COI/PDCI are paths operated in accordance with nomograms identified in WECC’s Path Rating Catalog. [↑](#footnote-ref-10)