# Posting 1

## Posting

This project was posted for comment from October 5 through November 6, 2023.

WECC distributed notice for the posting on October 5, 2023. The WECC-0153 INT Consolidated criterion (ICC) Drafting Team (DT) asked stakeholders to provide feedback on the proposed document(s) through a standardized WECC-provided web portal.

Three comments were received.

## Location of Comments

Comments can be viewed in their original format on the [WECC-0153](https://www.wecc.org/Standards/pages/wecc-0153.aspx)  project page under the “Submit and Review Comments” accordion.

## Changes in Response to Comment

## The DT offered a clarification to the Sacramento Municipal Utility District (SMUD) noting:

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| Net Interchange Scheduled (NIS) | NIS is synonymous with Net Scheduled Interchange. |

## The DT accepted SMUD’s request in INT-003-WECC-CRT to update the Background and change the word “must” to “may,” in the Rationale section addressing WR1, subsection b), fourth line.

The DT accepted SMUD’s request to embellish the Background section of INT-003-WECC-CRT as follows:

“Over the course of committee restructuring at WECC, the ISAS merged with the After-the-Fact Work Group, and was renamed the Interchange Scheduling and Energy Accounting Subcommittee (ISEAS).”

The DT recommends retirement of INT-020-WECC-CRT, except for WR5. Retirement is recommended because it does not reflect current practices, nor is the manual recordation required per the INT’s Attachment A efficient. That said, the DT believes retention of WR5 (reportingInterchange Software failure) has value. WR5 **is** excerpted from INT-020-WECC-CRT, along with the supporting Rationale, and relocated to INT-021-WECC-CRT as WR4.

## If an entity is currently using the INT-020-WECC-CRT process, deletion of the text does not mean the entity cannot continue to do so.

## Minority View

## The DT declined to accept Tacoma’s/Bonneville’s request to justify the entire document or retire it.

## The DT noted Tacoma’s concern regarding accountability in multiple forums. Although failure to adhere to a Regional Criterion may result in administrative action, Regional Criteria are not enforceable.

## Implementation Plan—Justification

*Proposed Effective Date*

The proposed effective date is the first day of the second quarter following regulatory approval.

*Justification*

The entirety of the ICC is Procedurally up to date with only two sections due for five-year review in the first half of 2024. Because the entire ICC is Procedurally up to date, and whereas the project proposes no new requirements, the ICC can be implemented without undue burden or delay. The DT did not identify any other WECC Criteria, Standards, or NAESB documents that would be impacted if the proposed ICC where adopted.

## Action Plan

On November 22, 2023, the WECC-0153 INT Consolidated Criterion (ICC) Drafting Team (DT) agreed to post Posting 2 of the project for an extended comment period to accommodate the 2023 holiday season.

Once the comment period opens, comments can be submitted by selecting the Submit and Review Comments accordion on the WECC-0153 homepage. Then, click Submit Responses to Posting 2. The posting period will open November 24, 2023, and close January 8, 2024. The DT will meet on January 10, 17, and 24, 2024, to address comments received.

## Contacts and Appeals

If you feel your comment has been omitted or overlooked, please contact [W. Shannon Black](mailto:sblack@wecc.org), WECC Consultant, at (503) 307-5782. In addition, there is a WECC Reliability Standards appeals process.

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| Commenter | Organization |
| Cain Braveheart | Bonneville Power Administration (BPA) |
| Jennie Wike | Tacoma Power (TP) |
| Tim Kelley | Sacramento Municipal Utility District (SMUD) and the Balancing Authority of Northern California (BANC) |

**Index to Questions, Comments, and Responses**

**Question**

1. **The drafting team invited comments on all aspects of the document.**

| Summary Consideration: | See summary in the preamble. |
| --- | --- |
| Commenter/Comment | Response |
| Cain Braveheart - BPA | Pertaining to WECC-0153 INT Consolidation, BPA supports the comments submitted by Jennie Wike, Tacoma Power. Thank you. |
| Thank you. Please see the below response provided to Tacoma. | |
| Jennie Wike—Tacoma Power | *Note: These comments were updated November 11, 2023 at Tacoma’s request. These updates are not reflected on the WECC-0153 Posting 1 Submit and Response accordion.*  Comment 1:  Tacoma requests that the drafting team review the technical need and justification for Regional Criteria that are linked to or associated with inactive INT Reliability Standards.  Only INT-006-5 and INT-009-3 standard remain active [at NERC]. The drafting team should establish a technical justification for the creation of the consolidated INT Regional Criteria and, if no justification is found for a given INT Regional Criteria, Tacoma requests that those Regional Criteria be retired.  Discussion:  As part of NERC’s Standard Efficiency Review Project, documented in NERC’s June 7, 2019, petition to FERC for approval of revised and retired Reliability Standards under the NERC Standard Efficiency Review, NERC concluded that the retired INT Standards are no longer needed to support reliability. NERC noted that Reliability Standards should be focused on advancing reliability and not proscribe business practices which do not contribute directly to reliability.  If the drafting team determines not to seek retirement of the INT Criteria, Tacoma Power requests that the drafting team provide technical justification for each of the WECC Criteria to be consolidated into the new INT Regional Criteria. This technical justification should explain why these WECC Criteria are needed for reliability in the [W]estern [I]nterconnection when the inactive INT Reliability NERC Standards were deemed not necessary for reliability.  Comment 2:  Tacoma Power is also concerned about the references to or Regional Criteria that appear to direct compliance with the NAESB standards. The Regional Criteria are typically associated with a Reliability Standard and exist to promote greater reliability of the bulk electric system. The reliability standards are authorized and enforced pursuant to the Energy Policy Act of 2005 (adding section 215 to the Federal Power Act pertaining to electric grid reliability). Authority to enforce these standards is delegated to WECC. The NAESB standards, on the other hand, are adopted and enforced by FERC under its Federal Power Act authority to regulate electric rates and transmission. That is a separate regulatory regime from the Reliability Standards and is enforced only by FERC. Tacoma Power recommends the drafting team retires INT Regional Criteria that overlap with NAESB requirements and otherwise revise the Regional Criteria to maintain clear jurisdictional distinctions. |
| **Comment 1: Justify or Retire**  The drafting team (DT) understands Tacoma’s position to be that the DT should be required to:  1) “review the technical need and justification for Regional Criteria that are linked to or associated with inactive INT Reliability Standards;” and  2) “establish a technical justification for the creation of the consolidated INT Regional Criteria.”  Tacoma suggests that where “no justification is found for a given INT Regional Criteria…those Regional Criteria be retired.”  Tacoma uses the Standard Efficiency Review Project (SERP) as its premise noting that FERC has concluded the NERC INT Standards are “no longer needed to support reliability.”  **Tacoma Comment 1:**  **Tacoma’s request could result in recategorization of the ICC, and may exceed the scope of the Standard Authorization Request (SAR). Disputes regarding the categorization of Regional Criteria are addressed by the WECC Standards Committee, who may use the Standards Development Procedures, as necessary.[[1]](#footnote-1)**  The team notes that, if fully implemented, Tacoma’s comment may be impacted by various policies and procedures, such as the NERC Rules of Procedure, the WECC Document Categorization Policy, and the Procedures. Because Tacoma’s request could require recategorizing the ICC, that task would fall to the WECC Standards Committee and may be outside of the scope of the current SAR. As such, the team encourages Tacoma to file a separate SAR addressing categorization. Further, because the Tacoma request could require interpretation of the NERC Rules of Procedure, Rule 313, that interpretation is outside the purview of the drafting team. As such, Tacoma could consider drafting a separate SAR addressing that issue.  *A separate SAR can be filed.*  Per the WECC-0153 SAR Introduction: “This project does not preclude an interim SAR prior to the 2029 date, if deemed necessary by a SAR author.” If Tacoma decides to file a separate SAR, the drafting team (DT) would encourage Tacoma to consider the following.  *The primary scope of the WECC-0153 SAR was to align and reset the review dates.*  Per the Scope section of the WECC-0153 SAR, “The entire ICC is open for review ***in order to reset the entire document***to a single five-year ***review date.*** Because much of the ICC has been recently reviewed, it is suggested that this project primarily focus on those portions of the ICC requiring review in 2024/2025.”[[2]](#footnote-2) The entirety of the ICC is Procedurally up to date with only two sections due for five-year review in the first half of 2024.  *NERC allows WECC to draft Regional Criteria.*  The authority to create the ICC hails from the NERC/WECC Delegation Agreement, as referenced in the WECC Relibaility Standards Development Procedures (Procedures), administered by the WECC Standards Committee under its charter, and incorporating by reference portions of the NERC Rules of Procedures, specifically Rule 313 defining a Regional Criterion.[[3]](#footnote-3) Per these combined documents, WECC has delegated authority to draft a Regional Criterion.  Per the NERC Rules of Procedure, Rule 313, a Regional Criterion is defined as:  “313. Other Regional Criteria, Guides, Procedures, Agreements, Etc. 1. Regional Criteria — Regional Entities **may** develop Regional Criteria that are necessary to implement, to augment, or to comply with NERC Reliability Standards, but which are not Reliability Standards. Regional Criteria **may** also address issues not within the scope of Reliability Standards, such as resource adequacy. Regional Criteria **may** include specific acceptable operating or planning parameters, guides, agreements, protocols or other documents used to enhance the reliability of the Bulk Power System in the Region. These documents typically provide benefits by promoting more consistent implementation of the NERC Reliability Standards within the Region. **These documents** are not NERC Reliability Standards, Regional Reliability Standards, or regional Variances, and therefore **are not enforceable** under authority delegated by NERC pursuant to delegation agreements and do not require NERC approval.” (Emphasis added.)  Within NERC, Rule 313, there are multiple “may” statements. These statements can be interpreted in various ways that would impact the validity and categorization of the ICC. For example, the first may statement states, WECC “may develop Regional Criteria that are necessary…to comply with NERC Reliability Standards.” If the first “may” statement is read as standalone and overarching, the ICC must be “necessary” to comply with a Standard. However, if the first statement is read separately from the second and third “may” statements, WECC could draft a Regional Criterion addressing “issues not within the scope of Reliability Standards,” that “include specific acceptable operating or planning parameters” to “enhance” reliability—such as the scheduling-related sections of the ICC. Thus, interpretation of Rule 313 could determine how Tacoma’s request is addressed. Interpretation is outside of the purview of the DT.  Within WECC, the WECC Document Categorization Policy also uses the same definition to define a WECC Regional Criteria.[[4]](#footnote-4)  On one hand, when each section of the ICC was originally drafted, each piece of the ICC was drafted to augment NERC’s INT-related Standards. So long as the ICC’s content remained connected to a NERC Standard, there was no question the ICC was necessary to implement, to augment, or to comply with NERC Reliability Standards. However, as NERC’s INT Standards are retired, that connection becomes tenuous.  Currently, only NERC INT-006-5, Evaluation of Interchange Transactions, and INT-009-3, Implementation of Interchange remain active.[[5]](#footnote-5) As to the remaining two Standards, NERC seeks to retire these as NERC’s independent subject matter experts concluded that the remaining content is more closely aligned with NAESB Business Practice Standards. (FERC Docket RM19-17-000.[[6]](#footnote-6))  As for INT-006, NERC argues portions of it provide “little, if any, benefit or protection to the reliability operation of the [Bulk-Power System].”[[7]](#footnote-7) As for INT-009, portions of that Standard are also being revised or retired.[[8]](#footnote-8) If INT-006 and INT-009 are retired, there will no longer be any NERC INT Standards with which the ICC may be associated.  In various filings, NERC argued that the NERC INT Standards: “(1) Provide little or no reliability benefit; (2) are administrative in nature or relate expressly to commercial or business practices; or (3) are redundant with other Reliability Standards.”[[9]](#footnote-9) Specific to the INT Standards, NERC argues that “e-Tags, are commercially-focused elements facilitating interchange and balancing of interchange.”[[10]](#footnote-10) And finally, “NERC asserts that its proposals [to retire all of the NERC INT Standards] would not adversely impact reliability,” but would “benefit reliability by allowing entities to focus their resources on those Reliability Standard requirements that promote the reliable operation and planning of the BPS [Bulk-Power System] and avoid unnecessary regulatory burden.”[[11]](#footnote-11)  NAESB concurs with NERC and is actively drafting to incorporate portions of the remaining two NERC INT Standards into NAESB’s Business Practice Standards.[[12]](#footnote-12)  On the other hand, the ICC includes a considerable amount of “guides, agreements, protocols or other documents used to enhance the reliability of the Bulk Power System in the Region” which would be fully acceptable.  *Remediation of document categorization is the purview of the WECC Standards Committee.*  Per the WECC Document Categorization Policy, when a dispute arises as to categorization:  **“**Disputes regarding the categorization of Regional Reliability Standards or *Regional Criteria shall be addressed by the WECC Standards Committee,* who may use the Standards Development Procedures as necessary.” [[13]](#footnote-13) (Emphasis added.)  *Conclusion*  Because virtually all of the NERC INT Standards have either already been retired or are in the retirement process, the ICC’s connection to a NERC Standard is tenuous. If that connection cannot be made, and it is determined that the ICC is not otherwise needed for reliability, recategorization per the WECC Document Categorization Policy may be appropriate. Any dispute over categorization would fall to the WECC Standards Committee (WSC). That action should be addressed under a separate SAR.  **Comment 2: Multiple venues of Accountability**  *Tacoma has provided no evidence or specific reference for the draft team to address.*  Tacoma suggests that the ICC appears “to direct compliance with the NAESB standards;” however, Tacoma provides no evidence or reference for the drafting team to address. In completing due diligence on Tacoma’s behalf, the drafting team reviewed the ICC seeking any such reference. Although the team found no such reference, it did make the following findings:   * No WECC Requirement (WR) was found directing “compliance with the NAESB standards.” * INT-001-WECC, WR1 requires the entity to perform *except when* performance would result in violating a NAESB Business Practice Standard. * INT-004-WECC, WR1 and WR3 were historically included because they address *issues not* *addressed by NAESB*. * INT-007-WECC-CRT, WR1, Item 2, requires action *only when* the “content of the Emergency RFI is correct and *meets all NERC, NAESB, and WECC requirements*;” thus, if there is an overlap there in no possibility of additional adverse accountability because all conditions are met. * INT-016-WECC, WR1 only applies when the applicable entity submits a RFI “*not otherwise required” by NAESB.*   Finding no overlap or proof of Tacoma’s concerns, no change was made.  Further, Tacoma raises the concern that whereas the ICC’s WECC Requirements might comingle with NAESB Business Practice Standards, and whereas any cross over between multiple regulatory forums may expose an entity to duplicative accountability—where found, that crossover should be remedied.[[14]](#footnote-14)  Finding no clear overlap, and whereas Tacoma raises an issue without specifying what language should be remedied, the team opted to make no changes. | |
| Tim Kelley—SMUD/BANC | ​These comments refer to the redline version in Posting 1 (for section and page sequencing). (Found [here.](https://internal.wecc.org/Reliability/WECC-0153%20INT%20CRT%20Consolidated%20Criterion%20-%20Posting%201%20-%20Redlined%2009-27-2023.docx))  **Comment 1:**  Background section, 3rd paragraph, at the top of page 25 - More history should be added, including how vendors rely on the annual WECC prescheduling calendar, ISAS and ATFWG were combined in 2023 to form ISEAS.  **Comment 2:**  Requirement WR1, 3rd paragraph, on page 25 - Shouldn't "NSI" be updated to the new format, as explained in the Definitions? And throughout the document?  **Comment 3:**  Page 26, 4th paragraph in section a) - In the following sentence the word "may is used, "The scheduler, for auditing purposes, may check the checkout box available under each Hour Ending value to ensure that a Balancing Authority has completed its checkout with the Interchange Software." In section b) the following sentence uses the word "must", "The Balancing Authority scheduler must manually compare each Hour Ending Value in the preschedule horizon between the Uploaded NSI and the NSI in the Interchange Software." SMUD and BANC recommend that the word "must" be changed to "can", because of the scheduler has options for auditing checkouts ("may" check the checkout box), then the scheduler should have options to manually compare each HE Value.  **Comment 4:**  Requirement WR14, on page 82 - Completing the Transaction Data Template (Attachment A) for each new transaction is an outdated method and would not be conducive to real time operations. It is true that Operators would need to keep track of verbal transactions, but Attachment A is not an efficient way of keeping track of verbal interchange transactions. A less cumbersome way would need to be offered. If the SDT feels this change could be made under WECC-0153 as a non-substantive change, then SMUD and BANC would like the SDT to address this issue. |
| **Comment 1:**  The DT concurs, updating the entire Background section as follows (primary emphasis on the last paragraph) INT-003-WECC-CRT:  **“Background**  On March 29, 1996, the New York Mercantile Exchange (NYMEX) began trading electricity futures at Palo Verde, Arizona, and the California-Oregon Border (COB). At that time, significant issues were found which affected coordination and reliability of control areas in the West.  In July 1996, a meeting was held to begin coordination of preschedule calendars within WECC. This led to the creation of the Interchange Scheduling and Accounting Subcommittee (ISAS). The ISAS’s purpose was to develop scheduling, tagging, and accounting practices enabling scheduling entities to schedule using the same parameters.  In February 2003, the ISAS approved guidelines streamlining and standardizing creation of the annual WECC Prescheduling Calendar (Calendar)[[15]](#footnote-15) later to be supported by the WECC Prescheduling Calendar Guideline (Guideline). Although these tools were initially presented as information-only, scheduling entities are now expected to use the Calendar and Guideline enabling all entities to schedule within the same parameters.  Over the course of committee restructuring at WECC, the ISAS merged with the After-the-Fact Work Group, and was renamed the Interchange Scheduling and Energy Accounting Subcommittee (ISEAS).”  **Comment 2:**  The DT agrees. No further Substantive change was made. Please see the Definitions section showing the following:   |  |  | | --- | --- | | Net Interchange Scheduled (NIS) | NIS is synonymous with Net Scheduled Interchange. |   **Comment 3:**  The DT concurs that the scheduler has options for auditing checkouts. At INT-003-WECC-CRT, Rationale, WR1, subsection b), fourth line: “must” was replaced with “may.”  **Comment 4:**  The DT recommends retirement of the entire INT-020-WECC-CRT, with the exception of WR5. Retirement is recommended because it does not reflect the entirety of current procedures, nor is the manual recordation per the INT’s Attachment A efficient. That said, the DT believes retention of WR5 (reporting when the Interchange Software fails) has value. WR5 was excerpted from INT-020-WECC-CRT, along with the supporting Rationale section, and migrated into INT-021-WECC-CRT.  Deletion of the language does not preclude an entity from continuing to perform tasks as indicated in INT-020-WECC-CRT. | |

1. WECC Document Categorization Policy, 1.3. Resolving Categorization Disputes https://www.wecc.org/Corporate/Document%20Categorization%20Policy%2010-2022.pdf [↑](#footnote-ref-1)
2. INT-CRTs due for review in the first half of 2024 are as follows:

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   | --- | --- | --- | --- |
   | INT-004-WECC-CRT-3.1 | 4/1/2019 | 4/1/2024 | WECC-0129 complete. |
   | INT-001-WECC-CRT-4.1 | 6/18/2019 | 6/18/2024 | WECC-0121A complete. |

   [↑](#footnote-ref-2)
3. Per the Procedures, Definitions, a Regional Criterion is “As defined in the NERC Rules of Procedure (ROP).” [↑](#footnote-ref-3)
4. WECC Document Categorization Policy, 2. Document Categories 2.2. Regional Criteria [↑](#footnote-ref-4)
5. For example, INT-001 through INT-005, INT-007, INT-008, and INT-010, have all been inactive since at least 2021 or earlier. [↑](#footnote-ref-5)
6. Electric Reliability Organization Proposal To Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review, A Proposed Rule by the Federal Energy Regulatory Commission on 02/06/2020. P24. [↑](#footnote-ref-6)
7. 172 FERC ¶ 61,225 UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION 18 CFR Part 40 [Docket Nos. RM19-16-000 and RM19-17-000; Order No. 873] Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review (Issued September 17, 2020). P14. [↑](#footnote-ref-7)
8. Id. P22. [↑](#footnote-ref-8)
9. Id. P1. P21. [↑](#footnote-ref-9)
10. Id. P22. [↑](#footnote-ref-10)
11. Docket No. RM19-17-000 Petition at 7. See P12 for more detail. [↑](#footnote-ref-11)
12. Per the NAESB Status Report Concerning Standards for Business Practices and Communication Protocols for Public Utilities (Docket No. RM05-5-027, February 10, 2020), NAESB reports that it identified INT-006-5, Requirement R4 for incorporation into one of its Business Practice Standards, further dwindling the Standard’s content. [↑](#footnote-ref-12)
13. WECC Document Categorization Policy, 1.3. Resolving Categorization Disputes. [↑](#footnote-ref-13)
14. “If the content of any document is obsolete or redundant to or in conflict with a (Regional) Reliability Standard or a Regional Criterion, the document shall be reviewed for possible revision or retirement.” WECC Document Categorization Policy, 1.2. Categorization Guidelines. Though 1.2 does not specify NAESB Business Practices Standards, the team believes the spirit of the document should also apply to redundancy at NAESB. [↑](#footnote-ref-14)
15. For purposes of this Background, the WECC Preschedule Calendar means the annual preschedule calendar defining the timing for scheduling of energy transmission. [↑](#footnote-ref-15)