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If you have questions, contact W. Shannon Black, WECC Manager of Standards Processes at [sblack@wecc.biz](mailto:sblack@wecc.biz).

An interpretation is limited to clarifying existing requirements in approved documents and cannot be used to create or change a Regional Reliability Standard or Criterion.

***Request for an Interpretation  
WECC Regional Reliability Standard or Criterion***

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**Identify the WECC Regional Reliability Standard or Criterion that needs clarification:**

WECC Regional Reliability Standard/Criterion Number (including version number): TOP-007-WECC-1 (Identified as TOP-STD-007-0 WR1 in the Settlement Agreement – simply pointing out)

(Example: PRC-STD-001-1 or INT-001-WECC-CRT-2)

**WECC Regional Reliability Standards/Criterion Title:** System Operating Limits

**Identify specifically what requirement needs clarification:** Requirement R1

**Requirement Number and Text of Requirement:** R1. When the actual power flow exceeds an SOL for a Transmission path, the Transmission Operators shall take immediate action to reduce the actual power flow across the path such that at no time shall the power flow for the Transmission path exceed the SOL for more than 30 minutes.

**What is the clarification needed? (Please state the issue and the clarification sought.)**

Clarification is needed that the requirement applies to Transmission Operators, as defined in the NERC Glossary of Terms, and not the path operators who have no compliance responsibilities under TOP-007-WECC-1, other than any responsibilities they may have as a Transmission Operator for facilities in their respective Transmission Operator Areas.

In the WECC Region “path operators” historically were assigned to each WECC transfer path that is subject to TOP-007-

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WECC-1. However, the WECC path operator function is not addressed or explained by NERC's *Functional Model* or the *Statement of Compliance Registry Criteria*, and TOP-007-WECC-1 by its express terms applies to Transmission Operators and makes no reference to path operators. To the extent path management requires coordination among multiple Transmission Operators or a wider area view that responsibility resides in the Reliability Coordinator.

The clarification is particularly necessary in situations where a path may involve multiple Transmission Operator Areas. A path operator has no recognized authority under the NERC functional model or under TOP-007-WECC. And even if the path operator is a Transmission Operator, it only has authority in its Transmission Operator Area and not in other Transmission Operator Areas that are part of the path, or over those Transmission Operators. There can be only a single Transmission Operator for a given Transmission facility. See section 501.1.4.3 of the NERC Rules of Procedure. To the extent a path operator is not the Transmission Operator over all facilities of the path, it has no ability to take or direct actions with regard to the path facilities in other Transmission Operator Areas or the path as a whole. That is why the requirement applies to Transmission Operators in the plural sense—each Transmission Operator has compliance responsibility under TOP-007-WECC-1 for its TOP facilities on the path and for its contribution to path loadings as a whole. The path operator, as such, has no authority or compliance responsibilities under TOP-007-WECC-1.

APS therefore, respectfully requests that WECC clarify that:

- each Transmission Operator with facilities in a path listed in the most current table of “Major WECC Transfer Paths in the Bulk Electric System” is independently responsible for taking immediate actions to reduce the actual power flow across its own facilities within the path when actual power flow exceeds the SOL for that path; and
- legacy “path operators” do not have obligations in their role as path operators under TOP-007-WECC-1; if a path operator is also a Transmission Operator of facilities in a path, that Transmission Operator has TOP-007-WECC-1 responsibilities as to the path facilities in its Transmission Operator Area, but does not have any additional TOP-007-WECC-1 responsibilities as to Transmission facilities outside its Transmission Operator Area.

**Identify the material impact associated with this interpretation:** The TOP-007-WECC-1 compliance responsibilities of Transmission Operators in circumstances where WECC path facilities are within multiple Transmission Operator Areas is unclear and is open to subjective interpretation, particularly given possible confusion regarding the roles and responsibilities of legacy path operators in those circumstances. This can lead to confusion regarding the authority (or lack thereof) and responsibility of Transmission Operators to take action to reduce flows on Transmission paths following an SOL exceedance, particularly on Transmission paths that are not within their Transmission Operator Area, potentially lengthening that exceedance.

**Identify the material impact to your organization or others caused by the actual or potential lack of clarity, or an incorrect interpretation of this standard/criterion.** APS is a Transmission Operator for certain transmission facilities within Path 49 and other designated WECC paths. There are several other Transmission Operators with facilities within Path 49. Lack of clarity on the roles of path operators and Transmission Operators has and could again adversely impact APS and/or regional reliability.