

System Operating Limits  
 WECC Regional Reliability Standard  
 Interpretation  
 TOP-007-WECC-1a



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|---|--|
| <b>Document name</b>                                      | <b>System Operating Limits<br/>TOP-007-WECC-1a<br/>Interpretation of WECC Standard</b>   |
| Category  | <input checked="" type="checkbox"/> Regional Reliability Standard (Interpretation)<br><input type="checkbox"/> Regional Criteria<br><input type="checkbox"/> Policy<br><input type="checkbox"/> Guideline<br><input type="checkbox"/> Report or other<br><input type="checkbox"/> Charter                            |
| Document date   |  |
| Adopted/approved by                                       |  |
| Date adopted/approved                                     |  |
| Custodian (entity responsible for maintenance and upkeep) | Standards  |
| Stored/filed  | Physical location:<br>Web URL:   |
| Previous name/number                                      | (if any)   |
| Status  | <input type="checkbox"/> in effect<br><input type="checkbox"/> usable, minor formatting/editing required<br><input type="checkbox"/> modification needed<br><input type="checkbox"/> superseded by _____<br><input type="checkbox"/> other _Append to TOP-007-WECC-1.<br><input type="checkbox"/> obsolete/archived) |

**Version Control**

| Version | Date | Action | Change Tracking |
|---------|------|--------|-----------------|
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**Project Roadmap**

| <b>Action</b>   | <b>Completed</b>   |
|---|--------------------|
| WECC-0010 Filed   | February 8, 2013   |
| WSC assembles a DT (21 days)  | March 13, 2013     |
| DT meeting (inaugural)  | April 11, 2013     |
| WSC approves posting  | April 18, 2013     |
| Post for 30-day Comment (Open)  | April 24, 2013     |
| Post for 30-day Comment (Closed)  | June 10, 2013      |
| IDT responds (15 days)  | June 10, 2013      |
| WSC approves posting of Responses and opening a Ballot Pool   | June 26, 2013      |
| NERC requested to forward list of needed filing documents   | July 19, 2013      |
| Notice of Ballot Pool / Ballot Window   | August 1, 2013     |
| Open a Ballot Pool (see draft below)  | August 5, 2013     |
| Notice of Joint Session   | August 1, 2013     |
| Close the Ballot Pool   | September 3, 2013  |
| Hold Joint Session  | September 5, 2013  |
| Draft Letter and Notify NERC<br><br>Interpretations of Regional Standards shall be submitted to NERC for processing with a request that the interpretation be adopted by the NERC Board of Trustees and then filed for approval with FERC and applicable Governmental Authorities in British Columbia, Alberta, and Mexico. | September 5, 2013  |
| Open the Ballot   | September 16, 2013 |
| Close the Ballot  | October 8, 2013    |
| Results to WSC for Review / forward to Board  |                    |
| Notice to Board (30 days out)   |                    |
| Board Meeting   |                    |
| Update the Standard; Append the Interpretation; change the Nomenclature.<br><br>The interpretation will remain appended to the Standard until such time as the Standard is revised through the normal process incorporating the clarifications provided by the interpretation.  |                    |

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## Procedure

Pursuant to the “Interpretation of Regional Standards and Regional Criteria,” section of the *Reliability Standards Development Procedures*, any entity may request an interpretation of a WECC Regional Standard (Standard). An interpretation is limited to clarifying existing requirements in approved Standards and may not be developed to expand upon a requirement or provide guidance on how to apply a requirement.

On February 8, 2013, Arizona Public Service (APS) filed [WECC-0010 Request for Interpretation](#) (Request). The Request is specific to TOP-007-WECC-1, System Operating Limits; Requirement R1. The WECC Standards Committee assigned the original TOP-007-WECC-1 Drafting Team to complete the interpretation, to the extent they were available to serve.

## Scope of the Interpretation

The Request is specific to the TOP-007-WECC-1, System Operating Limits, Applicability section and Requirement R1 that reads:

### A. Introduction

#### 4. Applicability

- 4.1. Transmission Operators for the transmission paths in the most current Table titled “Major WECC Transfer Paths in the Bulk Electric System” provided at [location].

### B. Requirements

- 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.

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### **Material Impact**

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.

### **Interpretation Requested**

APS asks for clarification that the Requirement R1 applies “to Transmission Operators, as defined in the NERC Glossary of Terms, and not to the *path operators* who have no compliance responsibilities under TOP-007-WECC-1 (TOP), other than any responsibilities they may have as a Transmission Operator for facilities in their respective Transmission Operator Areas.” (Emphasis added.)

### **Interpretation Provided**

APS’ Request is governed by the Procedures, Step 3 – Drafting Team Begins Drafting Phase and Submits Draft Standard to WSC, at page 6, stating:

“All WECC Standards will follow a standard format that refers to the “*Responsible Entities*” included in the NERC Functional Model and includes compliance measures according to the WECC standard template.” (Emphasis added.)

The NERC Functional Model 4, in effect at the time the standard was drafted, did not include Path Operators as an approved applicable entity; therefore, the document only applies to the stated Transmission Operators and does not apply to Path Operators.

Neither the TOP’s predecessor document, *TOP-STD-007-0, Operating Transfer Capability*, nor *TOP-007-WECC-1, System Operating Limits*, lists the Path Operator as an applicable entity. Both list the Transmission Operator. Even though TOP-STD-007-0 referred to an Operating Agent in the column header of its Attachment A, that reference did not impose a task or responsibility on a Path Operator nor did its reference change the applicability of the document to any entity other than the Transmission Operator.

During the development of TOP-STD-007-0, the drafting team acknowledged that certain tasks were generally being performed by Path Operators; however, the Procedures prohibited assigning tasks to a Path Operator because the Path Operator is not “included in the NERC Functional Model.”

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To the extent an interpretation seeks guidance on how to implement a document, the Procedures state, “An interpretation is limited to clarifying existing requirements in approved Standards. Interpretations may not be developed that expand upon a requirement or that provide guidance on how to apply a requirement.” (Emphasis added.) Procedures; “Interpretation of Regional Standards and Regional Criteria.”

This interpretation is appealable under the Procedures, Step 8, Appeal Process.

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**WECC-0010 Interpretation Drafting Team (IDT) Members<sup>1</sup>**

|                 |                           |
|-----------------|---------------------------|
| Steve Gillespie | CAISO                     |
| Stephanie Conn  | WAPA                      |
| Rich Hydzik     | Avista                    |
| Don Johnson     | Portland General Electric |
| Brian Tuck      | BPA                       |
| James Tucker    | Deseret                   |
| Dede Subakti    | CAISO                     |

**WECC Staff Support**

|                  |            |
|------------------|------------|
| Ken Wilson       | WECC Staff |
| W. Shannon Black | WECC Staff |

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<sup>1</sup> Of the original team, Mr. Tom Isham, Mr. Jared Griffiths, and Mr. Gregory Van Pelt were not available to participate. Ms. Stephanie Conn and Mr. Dede Subakti were added to the roster. Although Mr. W. Shannon Black of WECC was a member of the original drafting team, he will not serve on the interpretation drafting team but will serve as WECC staff support to the team.