

- **Standard Development Timeline**

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

- **Description of Current Draft**

FERC Orders 888 and 890, as well as Orders 713-A and 713-B and RM10-9-000, discuss the relationship between curtailment actions placed upon transmission schedules and transmission service priority. To bring the WECC Unscheduled Flow Reduction Guideline (UFRG) into compliance with these orders, on January 25, 2012, the WECC Unscheduled Flow Administrative Subcommittee approved changes to the UFRG. These changes, subsequently approved by the WECC Operating Committee (March 9, 2012) and the WECC Board of Directors (March 15, 2012), eliminate from the requirements any specific reference to the UFRG.

As a result of these approvals, conforming changes to this standard, IRO-006-WECC-1, *Qualified Transfer Path Unscheduled Flow Relief*, are required.

Proposed Changes

The draft standard proposes the following changes:

- Alignment of IRO-006-WECC-2 with the changes made to the WECC UFRG.
- Requirements have been redrafted to conform to current standard drafting conventions, to include, but not limited to, removing adverbs from Requirements and removing incorporation by reference wherever possible.
- The associated VSLs were modified to eliminate ambiguity.
- The Compliance section has been updated to reflect NERC “boilerplate” language.
- Finally, to further avoid incorporation by reference and clarify the requirements, the team proposes modifying the term “Relief Requirement” as currently approved in the WECC section of the NERC Glossary, and using the modified term in R1 and R2.

Project Roadmap

This section is maintained by the drafting team and is subject to change.

<u>Anticipated Actions</u>	<u>Anticipated Date</u>
<u>Standards Authorization Request (SAR)</u>	<u>April 30, 2012</u>
<u>WECC Standards Committee (WSC) approves SAR</u>	<u>May 1, 2012</u>
<u>WSC assigns drafting team</u>	<u>May 1, 2012</u>
<u>WECC concludes SAR changes are errata</u>	<u>May 8, 2012</u>
<u>WSC concurs SAR changes are errata</u>	<u>May 21, 2012</u>
<u>WECC Board of Directors approves changes as errata</u>	<u>June 25, 2012</u>
<u>NERC Legal informed WECC changes are not errata; mandates development via Reliability Standards Development Procedures (Procedures).</u>	<u>July 16, 2012</u>
<u>Two week notice for first drafting team meeting</u>	<u>July 23, 2012</u>
<u>Drafting Team meets / forwards Version 2 to WSC</u>	<u>August 7, 2012</u>
<u>WSC meets to approve posting</u>	<u>August 8, 2012</u>
<u>WECC Posting for 45-day comment – opened</u>	<u>August 9, 2012</u>
<u>WECC Posting for 45-day comment – closed</u>	<u>September 24, 2012</u>
<u>Meet to answer WECC Comments / no changes made</u>	<u>September 26, 2012</u>
<u>WSC approves for ballot</u>	<u>September 27, 2012</u>
<u>Sent to NERC for 45-day Posting</u>	<u>September 28, 2012</u>
<u>BELOW IS TENTATIVE / TARGETS ONLY</u>	
<u>NERC opens 45 day comment period</u>	<u>October 3, 2012</u>
<u>Ballot Pool Opens</u>	<u>October 23, 2012</u>
<u>Notice of Joint Session</u>	<u>October 31, 2012</u>
<u>Joint Session (Target: 1000 – 1200 Mountain)</u>	<u>November 20, 2012</u>
<u>Ballot Pool closes</u>	<u>November 22, 2012</u>
<u>NERC closes 45 day comment period</u>	<u>November 19, 2012</u>
<u>Ballot opens (at least 7 days after Joint Session)</u>	<u>November 27, 2012</u>

<u>Ballot closes (15 business days –cover Thanksgiving)</u>	<u>December 18, 2012</u>
<u>WSC meets for disposition</u>	<u>December 19, 2012</u>
<u>Packet to the Board</u>	<u>December 20, 2012</u>
<u>Board notice (10 days)</u>	<u>January 11, 2012</u>
<u>Special Board Meeting (requires the final docs be w/the Board for 30-days)</u>	<u>January 21, 2012</u>

Version History

<u>Version</u>	<u>Date</u>	<u>Action</u>	<u>Change Tracking</u>
<u>1</u>	<u>April 16, 2008</u>	<u>Permanent Replacement Standard for IRO-STD-006-0</u>	
<u>1</u>	<u>February 10, 2009</u>	<u>Adopted by NERC Board of Trustees</u>	
<u>1</u>	<u>March 17, 2011</u>	<u>FERC Order 746 issued by FERC approving IRO-006-WECC-1 (FERC approval effective on May 24, 2011)</u>	
<u>1</u>	<u>July 1, 2011</u>	<u>Effective Date</u>	<u>No change</u>
<u>1.1</u>	<u>June 25, 2012</u>	<u>WECC Board of Directors approves as errata. Was not approved by NERC; forwarded through the full Reliability Standards Development Procedures.</u>	
<u>2</u>			

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Definitions of Terms Used in the Standard

The current definition of Relief Requirement as contained in the NERC Glossary is as follows:

Relief Requirement
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The expected amount of the unscheduled flow reduction on the Qualified Transfer Path that would result by curtailing each Sink Balancing Authority's Contributing Schedules by the percentages listed in the columns of WECC Unscheduled Flow Mitigation Summary of Actions Table in Attachment 1 WECC IRO-006-WECC-1.

The drafting team is proposing the following change to the above definition to eliminate incorporation by reference to an extrinsic document:

Relief Requirement

The expected amount of the unscheduled flow reduction on the Qualified Transfer Path that would result by curtailing each Sink Balancing Authority's Contributing Schedules by the percentages determined in the WECC unscheduled flow mitigation guideline.

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A. Introduction

- 1. **Title:** Qualified Transfer Path Unscheduled Flow (USF) Relief
- 2. **Number:** IRO-006-WECC-2
- 3. **Purpose:** Mitigation of transmission overloads due to unscheduled flow on Qualified Transfer Paths.

4. Applicability

- 4.1. Balancing Authority
- 4.2. Reliability Coordinator

5. Effective Date: On the latter of the first day of the first quarter at least 45 days after Regulatory approval, or upon complete implementation of applicable webSAS changes and FERC approval of this standard and the revised Unscheduled Flow Mitigation Plan Documents.

B. Requirements

R1. Each Reliability Coordinator shall approve or deny a request within five minutes of receiving the request for unscheduled flow transmission relief from the Transmission Operator of a Qualified Transfer Path that will result in the calculation of a Relief Requirement. [Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]

R2. Each Balancing Authority shall perform any combination of the following actions meeting the Relief Requirement upon receiving a request for relief as described in Requirement R1: [Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]

- Approve curtailment requests to the schedules as submitted
- Implement alternative actions

C. Measures

M1. The Reliability Coordinator shall have evidence that it approved or denied the request within five minutes of receiving a request for relief, in accordance with Requirement R1. Evidence may include, but is not limited to, documentation of either an active or passive approval.

M2. Each Balancing Authority shall have evidence that it provided the Relief Requirement through Contributing Schedules curtailments, alternative actions, or a combination that collectively meets the Relief Requirement as directed in Requirement R.2.

D. Compliance

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1. Compliance Monitoring Process:

1.1. Compliance Enforcement Authority

- Regional Entity
- If the Responsible Entity works for the Regional Entity, then the Regional Entity will establish an agreement with the ERO or another entity approved by the ERO and FERC (i.e., another Regional Entity) to be responsible for compliance enforcement.
- If the Responsible Entity is also a Regional Entity, the ERO or a Regional Entity approved by the ERO and FERC or other applicable governmental authorities shall serve as the Compliance Enforcement Authority.

1.2. Evidence Retention:

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

- Each Balancing Authority and Reliability Coordinator shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.
- The Balancing Authority and Reliability Coordinator shall retain data or evidence for three calendar years or for the duration of any Compliance Enforcement Authority investigation, whichever is longer.
- If a Balancing Authority or Reliability Coordinator is found non-compliant, it shall keep information related to the non-compliance until found compliant or for the duration specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.3. Compliance Monitoring and Assessment Processes:

- Compliance Audit
- Self-Certification
- Spot Checking
- Compliance Investigation
- Self-Reporting
- Complaint

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1.1 - Compliance Monitoring Responsibility¶
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- Spot check audits conducted anytime with 30 days notice given to prepare¶

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1.4. Additional Compliance Information:

Compliance shall be determined by a single event, per path, per calendar month (at a minimum) provided at least one event occurs in that month.

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2. Violation Severity Levels of Non-Compliance for Requirement R1¶

2.1. **Lower:** There shall be a Lower Level of non-compliance if there is one instance during a calendar month in which the Reliability Coordinator approved (actively or passively) or denied a Step 4 or greater request greater than five minutes after receipt of notification from the Transmission Operator of a Qualified Transfer Path.¶

2.2. **Moderate:** Not Applicable¶

2.3. **High:** Not Applicable¶

2.4. **Severe:** Not Applicable¶

3. Violation Severity Levels of Non-Compliance for Requirement R2¶

3.1. **Lower:** There shall be a Lower Level of non-compliance if there is less than 100% Relief Requirement provided but greater than or equal to 90% Relief Requirement provided or the Relief Requirement was less than 5 MW and was not provided.¶

3.2. **Moderate:** There shall be a Moderate Level of non-compliance if there is less than 90% Relief Requirement provided but greater than or equal to 75% Relief Requirement provided and the Relief Requirement was greater than 5 MW and was not provided.¶

3.3. **High:** There shall be a High Level of non-compliance if there is less than 75% Relief Requirement provided but greater than or equal to 60% Relief Requirement provided and the Relief Requirement was greater than 5 MW and was not provided.¶

3.4. **Severe:** There shall be a Severe Level of non-compliance if there is less than 60% Relief Requirement provided and the Relief Requirement was greater than 5 MW and was not provided.¶

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WECC Standard IRO-006-WECC-2 – Qualified Transfer Path Unscheduled Flow Relief

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	Time Horizon	VRE	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	<u>Real Time Operations</u>	<u>Medium</u>	<u>Not Applicable</u>	<u>Not Applicable</u>	<u>Not Applicable</u>	<u>There shall be a Severe level of non-compliance if there is one instance during a calendar month in which the Reliability Coordinator approved (actively or passively) or denied a request for unscheduled flow transmission relief from the Transmission Operator of a Qualified Transfer Path, greater than five minutes after receipt of notification from the Transmission Operator of a Qualified Transfer Path.</u>
R2	<u>Real Time Operations</u>	<u>Medium</u>	<u>There shall be a Lower Level of non-compliance if there is less than 100% Relief Requirement provided but greater than or equal to 90% Relief Requirement provided or the Relief Requirement was less</u>	<u>There shall be a Moderate Level of non-compliance if there is less than 90% Relief Requirement provided but greater than or equal to 75% Relief Requirement provided.</u>	<u>There shall be a High Level of non-compliance if there is less than 75% Relief Requirement provided but greater than or equal to 60% Relief Requirement provided.</u>	<u>There shall be a Severe Level of non-compliance if there is less than 60% Relief Requirement provided.</u>

WECC Standard IRO-006-WECC-2 – Qualified Transfer Path Unscheduled Flow Relief

	Time Horizon	VRE	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			than 5 MW and was not fully provided.			

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