

# WECC-0111 TOP-007-WECC-1a System Operating Limits – Retire or Modify Supporting Narrative and Crosswalk to Retire

## MEMO

Date: August 6, 2015

Subject: Retirement of TOP-007-WECC-1a (TOP)  
System Operating Limits  
Posting 2

The WECC-0111, TOP-007-WECC-1a, System Operating Limits (TOP) – Retire or Modify – Drafting Team (DT) has reviewed NERC Standards, both in effect and those standards that are approved pending regulatory filing, and concluded that the substance of WECC Regional Reliability Standard (RRS)<sup>1</sup> should be retired immediately and in its entirety because the reliability-related substance is addressed in peripheral NERC Standards. The DT does not believe any further actions are necessary to implement the proposed changes.

### Request to Retire

On March 27, 2015 and again on June 30, 2015, WECC distributed notice of posting for comment asking stakeholders to provide feedback on the proposed retirement of the TOP consisting of the following two Requirements:

### 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. *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*

**R2.** The Transmission Operator shall not have the Net Scheduled Interchange for power flow over an interconnection or Transmission path above the path's SOL when the Transmission Operator implements its real-time schedules for the next hour. For paths internal to a Transmission Operator Area that are not scheduled, this requirement does not apply. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*

**R2.1.** If the path SOL decreases within 20 minutes before the start of the hour, the Transmission Operator shall adjust the Net Scheduled Interchange within 30 minutes to the new SOL value. Net Scheduled Interchange exceeding the new SOL during this 30-minute period will not be a violation of R2.

In each posting, comments were received through a standardized electronic template.

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<sup>1</sup> Unless otherwise specified, capitalized terms are those defined in the NERC Glossary of Terms Used in Reliability Standards, the NERC Functional Model, and the NERC Rules of Procedures.

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Posting 1 was posted for comment from March 27 through May 11, 2015. Posting 2 was posted for comment from July 1 through July 31, 2015.

In Posting 1, comments were received from three entities representing five of the eight WECC Standards Voting Sectors. Of the three comments received, all three agreed Requirement R1 should be retired and would not result in any negative impacts to the Bulk-Electric System (BES). One entity (Idaho Power) commented that Requirement R2 should not be retired as to do so would leave reliability-related tasks uncovered. After reviewing Idaho's concerns, the DT disagreed with Idaho's positions. Although the DT made no further substantive changes to the project it did further buttress its previous arguments in response to Idaho's concerns.

In Posting 2, comments were received from one entity representing two of the eight WECC Standards Voting Sectors. That entity, the California Independent System Operator was in support of complete retirement of the document.

On June 4, 2015, the DT agreed by consensus to forward the WECC-0111 project to the WECC Standards Committee (WSC) with a request for ballot; however, a review of the project indicated that posting of an implementation plan with greater granularity would be in order. Posting 2 met that requirement.

### **Structure and Overview**

The following narrative and crosswalk are offered in support of the retiring Requirements R1 and R2. The narrative is presented in four parts: 1) presentation of analysis in tabular form (crosswalk) illustrating current and future requirements under NERC Standards, 2) a supportive narrative, 3) a proposed project roadmap, and 4) a proposed Implementation Plan.

If you have questions on the narrative, the DT encourages you to contact the DT chair, Mr. Vic Howell, [vhowell@peakrc.com](mailto:vhowell@peakrc.com) at 970-776-5573, or WECC Staff support, Mr. W. Shannon Black, [sblack@wecc.biz](mailto:sblack@wecc.biz), at (503) 307-5782.

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### Section 1: Tabular Crosswalk

#### **Requirement R1**

When a System Operating Limit (SOL) is exceeded, TOP Requirement R1 requires a Transmission Operator (TOP) to: 1) take immediate action, 2) to reduce power flow, and 3) do so within 30 minutes.

In approved NERC Standards currently in effect, the TOP is required to: 1) plan not to exceed an SOL<sup>2</sup>, 2) implement that plan<sup>3</sup>, 3) operate to prevent violating an SOL<sup>4</sup>, 4) operate within the SOL<sup>5</sup>, and to 5) take immediate action if an SOL is exceeded<sup>6,7</sup>. Thus, the TOP R1 is redundant to the existing NERC Standards in effect and should be retired.

<b>Analysis Table: Requirement R1</b>		
<b>TOP-007-WECC-1 Requirements</b>	<b>NERC Standards, Approved and in Effect</b>	<b>NERC Standards, Approved Pending Regulatory Filing</b>
<p>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. [Violation Risk Factor: High] [Time Horizon: Real-time Operations]</p>	<p>TOP-004-2 R6. Transmission Operators, individually and jointly with other Transmission Operators, shall develop, maintain, and implement formal policies and procedures to provide for transmission reliability. These policies and procedures shall address the execution and coordination of activities that impact inter- and intra-Regional reliability, including:</p> <p style="margin-left: 40px;">R6.1. Monitoring and controlling voltage levels and real and reactive</p>	<p>TOP-002-4 R1. Each Transmission Operator shall have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its Transmission Operator Area will exceed any of its System Operating Limits (SOLs). [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</p> <p>TOP-002-4 R2. Each Transmission Operator shall have an Operating Plan(s)<sup>8</sup> for next-day operations to</p>

<sup>2</sup> TOP-002-2.1b, R10

<sup>3</sup> TOP-004-2, R6

<sup>4</sup> TOP-008-4, R2

<sup>5</sup> TOP-004-2, R1 and R2

<sup>6</sup> TOP-008-1, R1

<sup>7</sup> Arguably, the TOP's plans are then coordinated with the Reliability Coordinator. IRO-001-1.1, Reliability Coordination of Responsibilities and Authorities, R7

<sup>8</sup> Unless otherwise specified all capitalized terms carry the definition supported in the NERC Glossary of Terms and the NERC Functional Model.

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	<p>power flows.</p> <p>R6.2. Switching transmission elements.</p> <p>R6.3. Planned outages of transmission elements.</p> <p>R6.4. Responding to IROL and SOL violations.</p> <p>TOP-002-2.1b R10. Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).</p> <p>TOP-008-1 R2. Each Transmission Operator shall operate to prevent the likelihood that a disturbance, action, or inaction will result in an IROL or SOL violation in its area or another area of the Interconnection. In instances where there is a difference in derived operating limits, the Transmission Operator shall always operate the Bulk Electric System to the most limiting parameter.</p>	<p>address potential System Operating Limit (SOL) exceedances identified as a result of its Operational Planning Analysis as required in Requirement R1. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</p> <p>TOP-002-4 R3. Each Transmission Operator shall notify entities identified in the Operating Plan(s) cited in Requirement R2 as to their role in those plan(s). [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</p> <p>TOP-001-3 R1. Each Transmission Operator shall act to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions. [Violation Risk Factor: High][Time Horizon: Same-Day Operations, Real-time Operations]</p> <p>TOP-001-3 R2. Each Balancing Authority shall act to maintain the reliability of its Balancing Authority Area via its own actions</p>
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Per the NERC System Operating Limit (SOL) Whitepaper, timing requirements are expected to be address in Operating Plans. Page 8 of the NERC SOL Whitepaper states:

Operating Plans contain details to include appropriate timelines to escalate the level of mitigating plans/strategies to ensure BES performance is maintained as per approved FAC-011-2, Requirement R2, preventing SOL exceedances from becoming an IROL. Operating Plan(s) must include the appropriate time element to return the system to within acceptable Normal and Emergency (short-term) Ratings and/or operating limits identified above.

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	<p>TOP-004-2 R1. Each Transmission Operator shall operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating Limits (SOLs).</p> <p>TOP-004-2 R2. Each Transmission Operator shall operate so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single contingency</p> <p>TOP-008-1 R1. The Transmission Operator experiencing or contributing to an IROL or SOL violation shall take immediate steps to relieve the condition, which may include shedding firm load.</p>	<p>or by issuing Operating Instructions. [Violation Risk Factor: High][Time Horizon: Same-Day Operations, Real-time Operations]</p> <p>TOP-001-3 R10. Each Transmission Operator shall perform the following as necessary for determining System Operating Limit (SOL) exceedances within its Transmission Operator Area: [Violation Risk Factor: High] [Time Horizon: Real-Time Operations]</p> <p>10.1. Within its Transmission Operator Area, monitor Facilities and the status of Special Protection Systems, and</p> <p>10.2. Outside its Transmission Operator Area, obtain and utilize status, voltages, and flow data for Facilities and the status of Special Protection Systems.</p> <p>TOP-001-3 R14. Each Transmission Operator shall initiate its Operating Plan to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment. [Violation Risk Factor: High] [Time Horizon: Real-time Operations]</p> <p>Rationale for Requirement R14: The original Requirement R8 was</p>
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		<p>deleted and original Requirements R9 and R11 were revised in order to respond to NOPR paragraph 42 which raised the issue of handling all SOLs and not just a sub-set of SOLs. The SDT has developed a white paper on SOL exceedances that explains its intent on what needs to be contained in such an Operating Plan.</p> <p>TOP-001-3 R18. Each Transmission Operator shall operate to the most limiting parameter in instances where there is a difference in SOLs. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]</p> <p>Rationale for Requirement R18: Derived limits replaced by SOLs for clarity and specificity. SOLs include voltage, Stability, and thermal limits and are thus the most limiting factor.</p>
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### Requirement R2

The TOP is required to: 1) prevent Net Scheduled Interchange (NSI), 2) from exceeding an SOL, 3) when the TOP implements its Real-time schedules for the next hour. If the SOL decreases within 20 minutes before the start of the hour, the TOP is required to adjust the NSI within 30 minutes to the new SOL value.

In approved NERC Standards, NSI is addressed by the Balancing Authority<sup>9</sup> – not the TOP, and the prevention and mitigation of SOL exceedances are addressed by the TOP requirements listed in the Analysis Table for Requirement R1. With the retirement of Requirement R2, BES reliability will continue to be upheld through the approved NERC Standards that require operation within SOLs and IROLs. Scheduling practices and business rules and procedures regarding scheduling relative to Available Transfer Capability and Available Flow Capability are more appropriately addressed in the North American Energy Standards Board standards.

<b>Analysis Table: Requirement R2</b>		
<p>R2. The Transmission Operator shall not have the Net Scheduled Interchange for power flow over an interconnection or Transmission path above the path’s SOL when the Transmission Operator implements its real-time schedules for the next hour. For paths internal to a Transmission Operator Area that are not scheduled, this requirement does not apply. [Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]</p> <p>R2.1. If the path SOL decreases within 20</p>	<p>Planning and operating requirement references are contained in the Requirement R1 section and are not repeated here.</p> <p>NSI is addressed by BA - not the TOP. A supporting narrative for the premise is contained in the analysis segment of this filing and is supported by the Glossary of Terms Used in NERC Reliability Standards as well as the NERC Functional Model.<sup>10</sup></p> <p>TOP-002-2.1b R5. Each Balancing Authority and Transmission Operator shall plan to meet scheduled system configuration, generation dispatch, interchange scheduling and demand patterns.</p> <p>TOP-002-2.1b R6. Each Balancing Authority and Transmission Operator</p>	<p>Planning and operating requirement references are contained in the Requirement R1 section and are not repeated here.</p> <p>TOP-002-4 R4. Each Balancing Authority shall have an Operating Plan(s) for the next-day that addresses: [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]</p> <p>4.1 Expected generation resource commitment and dispatch</p> <p>4.2 Interchange scheduling</p> <p>4.3 Demand patterns</p> <p>4.4 Capacity and energy reserve requirements, including deliverability capability</p> <p>TOP-002-4 R5. Each Balancing</p>

<sup>9</sup> INT-006-4, R1

<sup>10</sup> Additional supporting evidence can be found in the North American Energy Standards Board conventions; however, those conventions are not addressed in this filing.

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<p>minutes before the start of the hour, the Transmission Operator shall adjust the Net Scheduled Interchange within 30 minutes to the new SOL value. Net Scheduled Interchange exceeding the new SOL during this 30-minute period will not be a violation of R2.</p>	<p>shall plan to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization, sub-regional, and local requirements.</p> <p>IRO-005-3.1a R11. The Transmission Service Provider shall respect SOLs and IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation processes.</p> <p>TOP-002-2.1b R12. The Transmission Service Provider shall include known SOLs or IROLs within its area and neighboring areas in the determination of transfer capabilities, in accordance with filed tariffs and/or regional Total Transfer Capability and Available Transfer Capability calculation processes.</p>	<p>Authority shall notify entities identified in the Operating Plan(s) cited in Requirement R4 as to their role in those plan(s).          [Violation Risk Factor: Medium]          [Time Horizon: Operations Planning]</p> <p>TOP-001-3 R2. Each Balancing Authority shall act to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions. [Violation Risk Factor: High][Time Horizon: Same-Day Operations, Real-time Operations]</p>
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### Supporting Narrative and Crosswalk to Retire

#### **Section 2: Supporting Narrative**

#### **Requirement R1**

The essentials of the TOP, Requirement R1, call for the TOP to complete the following tasks:

- 1) Reduce the actual flow when a System Operating Limit (SOL) is exceeded.
- 2) Reduce the flow in less than 30 minutes.

A review of NERC Standards currently in effect and those standards approved, but pending regulatory filing, shows the above two mandates are amply covered in numerous other NERC Standards; therefore, Requirement R1 should be retired. The premise is well represented in the referenced documents footnoted in the above table.

In addition to those NERC Standards referenced in the above table, the DT also notes that in TOP-004-2, Transmission Operations, the TOP is required to protect against instability, uncontrolled separation, or cascading outages (R3), making every effort to stay connected to the system (R5), and to work with other TOPs to achieve the goal (R6) while specifically focusing on monitoring and control of voltage levels, real power flows, and response to SOL violations (R6). Specifically, the TOP must explicitly operate with SOLs (R1) thereby negating the additional requirement of the TOP.

There is also a level of coordination between entities that will ensure continued reliability of the Interconnection in the event the TOP Requirement R1 is retired. This coordination extends to Balancing Authorities (BA) and Reliability Coordinators (RC) in TOP-002-2-2.1b, Normal Operations, in that TOPs are required to work with Balancing Authorities (BA) to maintain plans to ensure reliable operation (R1, R4, and R11) and the ability to meet scheduled system configuration (R5). In short, if the TOP Requirement R1 is retired there are ample peripheral NERC requirements to ensure the task is addressed.

#### **Review of NERC Standards Approved but Pending Regulatory Filing**

Although the DT is confident that existing NERC Standards amply cover Requirement R1, the DT also reviewed NERC Standards approved, but pending regulatory filing, to ensure that no future conflicts were anticipated. That review supported the DT's position, found no potential conflicts, and revealed additional Standards in support of the DT's position.

For example, TOP-002-4, Operations Planning, requires the TOP to have an Operational Planning Analysis (OPA) to determine whether planned operations for the next day will exceed SOLs and IROLs<sup>11</sup>, to develop Operating Plans (OP) that address potential SOL exceedances identified in OPAs<sup>12</sup>, and to notify entities identified in the OP as to their role in those plans.<sup>13</sup> Further, each TOP is required to initiate its OP to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time

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<sup>11</sup> TOP-002-4, R1

<sup>12</sup> TOP-002-4, R2

<sup>13</sup> TOP-002-4, R3

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Assessment.<sup>14</sup> These OPs are expected to include, among other things, company-specific system restoration plans that include an Operating Procedure for black-starting units, and Operating Processes for communicating restoration progress with other entities.

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<sup>14</sup> TOP-001-3, R14

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### Supporting Narrative and Crosswalk to Retire

#### Requirement R2

The essentials of the TOP, Requirement R2, call for the TOP to complete the following tasks:

- 1) Ensure the Net Scheduled Interchange (NSI) for power flow over an interconnection or Transmission path does not exceed the SOL;
- 2) When the TOP implements its real-time schedules for the next hour; (and),
- 3) Downward adjusts its schedules if the SOL decrease within 20 minutes before the start of the hour.

#### **Requirement R2 should be retired as it is fundamentally flawed in requiring the TOP to address NSI.**

The TOP was originally approved on April 16, 2008<sup>15</sup>; the NERC Functional Model (FM) Version 5 was last published in May 12, 2010. The tasks assigned to the TOP in the TOP do not align with the roles and responsibilities described in the current version of the FM. The DT notes that the assignment of the TOP as the Applicable Entity for TOP, Requirement R2 is fundamentally flawed because the TOP does not control NSI.<sup>16</sup> As such those entities assigned to address NSI under the FM should retain that task. The DT has determined that retirement of Requirement R2 will not result in reliability gap as control and responsibility for NSI will remain covered by the appropriate functional entities in other NERC Standards. NSI, by definition, is the “algebraic sum of all Interchange Schedules across a given path or between Balancing Authorities for a given period or instant in time.” Restated, the TOP is required in the TOP, Requirement R2 to be responsible for NSI that is the sum of all agreed upon Interchange Transactions to include:

- 1) Megawatt size,
- 2) Start and end time,
- 3) Beginning and ending ramp times and rates, and
- 4) Type required for delivery and receipt of power and energy between the Source and the Sink Balancing Authorities – AKA: the Interchange Schedule.<sup>17</sup>

An Interchange Schedule cannot take place without an Interchange Transaction, the details of which are requested via a Request-for-Interchange (RFI)<sup>18</sup>, submitted for approval as an Arranged Interchange, implemented via an Interchange Transaction Tag or e-Tag, and communicated by the Interchange Authority. As the TOP is not part of the aforementioned chain, and whereas the Request-for-Interchange is generally submitted by the Purchasing-Selling Entity and/or the Load Serving Entity<sup>19</sup>, and

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<sup>15</sup> The earlier designation was TOP-STD-007-0.

<sup>16</sup> Of the 22 “relationships with Other Functional Entities” assigned to the TOP in the NERC Functional Model, none address NSI or scheduling.

<sup>17</sup> See defining for Interchange Schedule.

<sup>18</sup> A collection of data as defined in the NAESB Business Practice Standards submitted for the purpose of implementing bilateral Interchange between Balancing Authorities or an energy transfer within a single Balancing Authority.

<sup>19</sup> See NAESB WEQ-004-1 and 004-2.

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approved or denied by the Balancing Authority<sup>20</sup> and Transmission Service Provider<sup>21</sup>, it is not in the purview of the TOP to ensure the NSI does not exceed an SOL, nor is that a reliability issue since several Reliability Standards exist which require the TOP to operate within SOLs and to prevent and mitigate SOL exceedances, thus preserving the reliability aspect of the BES. Thus, Requirement R2 in the TOP is incorrectly assigned and should be retired.

In INT-006-4, Evaluation of Interchange Transactions, Requirement R1, the BA is required to approve or deny Arranged Interchange (AI) if it does not expect to be capable of supporting the magnitude of the interchange or ramping throughout the duration of the AI. To further clarify the intent of the Requirement, the standard's Background section makes it clear that Requirement R1 describes those circumstances when a BA "must" deny an AI (see below). Because the BA has access to all of the information required to perform the assigned task, the BA is an appropriate Applicable Entity to carry out the assigned task. By contrast, the TOP does not have access to each of these informational elements and is therefore not the best choice to perform the associated tasks. This distinction is noted by the obvious absence of reference to the TOP in any of the existing standards of the NERC INT suite.

Furthermore INT-006-4 contains a requirement that specifically addresses changes to AI for reliability purposes. Requirement R3 states,

- R3. The Source Balancing Authority and the Sink Balancing Authority receiving a Reliability Adjustment Arranged Interchange shall approve or deny it prior to the expiration of the time period defined in Attachment 1, Column B. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning, Same-day Operations, Real-time Operations]
  - 3.1. If a Balancing Authority denies a Reliability Adjustment Arranged Interchange, the Balancing Authority must communicate that fact to its Reliability Coordinator no more than 10 minutes after the denial.

#### **Requirement R2 should be retired because coordination of Real-time schedules for the next-hour is covered in other NERC Standards.**

The TOP Requirement R2 requires that the TOP ensure that power flows over an interconnection or path do not exceed assigned SOL's when the TOP implements its real-time schedules for the next hour. Under TOP-002-2.1b, Normal Operations Planning, Requirement R4, the TOP is required to coordinate its current-day plans with the RC. Current day plans would include Real-Time operations (present time as opposed to future time), "so that normal Interconnection operation will proceed in an orderly and consistent manner." The same standard at Requirement R10 states:

- R10.** Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). (See also...)

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<sup>20</sup> INT-006-4, Evaluation of Interchange Transactions, Requirement R1.

<sup>21</sup> INT-006-4, Evaluation of Interchange Transactions, Requirement R2.

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- R1.** Each Transmission Operator shall operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating Limits (SOLs). (TOP-004-2, Transmission Operations.)<sup>22</sup>

The TOP is required to plan to meet all SOLs and also to operate within SOLs when operating in Real-time, irrespective of scheduling practices.

Finally, as to covering any situational awareness contained in TOP, Requirement R2, this is addressed in TOP-002-2.1b, Requirement R.11 that requires the TOP to perform cyclical studies to determine potential changing SOLs. Again, if the intent of the TOP Requirement R2 is to enhance situational awareness, the TOP's cyclical SOL review should meet that need.

TOP-007-WECC-1a, System Operating Limits, Requirement R2 should be retired because it is redundant to other NERC Standards. Those standards require: 1) BAs to implement NSI, not the TOP, 2) oversight of SOLs to be shared between TOPs and the RC, and 3) TOPs to maintain SOL awareness which are covered in the NERC TOP suite of standards as addressed above. The DT has concluded that there is no need to retain the Requirement R2 as its function is redundant and unnecessary for reliability.

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<sup>22</sup> A majority of this TOP addresses treatment of SOLs.

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## Section 3: Roadmap

Actions	Proposed Date
1. SAR Filed	12-17-2014
2. WSC approved the SAR	1-8-2015
3. DT solicitation notice dispatched	1-9-2015
4. Notice of DT Assignment	1-9-2015
5. Posting 1 Comments Open	3-27-2015
6. Posting 1 Comments Closed (45-day)	5-11-2015
7. DT Meets to answer Comments	5-14-2015
8. DT Meets to approve Implementation Plan	6-30-2015
9. Posting 2 Comments Open	7-1-2015
10. Posting 2 Comments Close	7-31-2015
11. DT Meets to answer Comments	8-6-2015
12. WSC approves for ballot	8-12-2015
<b>To Be determined</b>	
13. Notice of Standards Briefing	8-18-2015
14. Notice of Ballot Pool Forming	8-18-2015
15. Standards Briefing	9-3-2015
16. Ballot Pool – Open	9-8-2015
17. NERC Posting for 45 days – Open	9-11-2015
18. Ballot Pool – Closed	9-24-2015
19. Ballot Opens	9-29-2015

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20. Ballot Closes	10-16-2015
21. NERC Posting for 45 days – Closed	10-26-2015
22. DT meets to address NERC Comments	10-27-2015
23. WSC approves forwarding document to the WECC Board of Directors / Standards Documents to Admin	10-29-2015
24. Notice to WECC Board of Directors (NLT)	10-30-2015
25. WECC Board of Directors	12-1-2015
26. 26. File with NERC	TBD
27. 27. NERC BOT	TBD
28. 28. NERC Files with NERC	TBD
29. 29. FERC action	TBD

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## **Section 4: Implementation Plan**

No-precursory steps are required to immediately retire the TOP in its entirety because the reliability—related substance is covered in peripheral NERC Standards. As such no additional action is required to implement retirement of the entire document, subject to all required regulatory approvals.

In accordance with the Reliability Standards Development Procedures (Procedures), Step 5- Post for Comment, “[a]n implementation plan shall be included in at least one iterative posting during the development of the [Regional Reliability Standard] and shall be a part of the final record for consideration prior to ballot.”

On December 17, 2014, WECC accepted a Standards Authorization Request (SAR) requesting, “To the extent the TOP’s Requirements are no longer needed for reliability they should be retired.”

On March 27, 2015, WECC distributed on behalf of the WECC-0111, TOP-007-WECC-1a, System Operating Limits (TOP) – Retire or Modify – Drafting Team (DT) notice of posting for comment (Posting 1). Posting 1 noticed the project’s intent “that the substance of [the TOP] should be retired in its entirety because the reliability-related substance is addressed in peripheral NERC Standards”<sup>23</sup>; thus, immediate retirement would have no detrimental impact on the BES. In Section 3 of Posting 1, the DT indicated its intent to file a request for retirement with NERC during the last quarter of 2015 with the final retirement date to be set by the appropriate regulatory entity.

On June 9, 2015, the DT posted Responses to Comments for Posting 1 indicating: 1) because retirement of the standard will have no detrimental impact on the reliability of the BES, the DT recommends retirement become effective on the first day of the first quarter following appropriate regulatory approval, and 2) that [a]fter reviewing the associated standards and practices, the DT concluded that there are no pre-cursory steps required to implement retirement of the standard as of the above recommended Effective Date.

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<sup>23</sup> Posting 1 Preamble