

June 10, 2019

VIA ELECTRONIC FILING

Mr. Patrick Wruck, Commission Secretary
British Columbia Utilities Commission
Box 250, 900 Howe Street
Sixth Floor
Vancouver, B.C.
V6Z 2N3

Re: *North American Electric Reliability Corporation*

Dear Mr. Wruck:

The North American Electric Reliability Corporation (“NERC”) hereby submits Notice of Filing of the North American Electric Reliability Corporation of Proposed Reliability Standard IRO-002-6. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Lauren Perotti

Lauren Perotti
*Senior Counsel for the North American Electric
Reliability Corporation*

Enclosure

3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

**BEFORE THE
BRITISH COLUMBIA UTILITIES COMMISSION
OF THE PROVINCE OF BRITISH COLUMBIA**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NOTICE OF FILING OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF PROPOSED
RELIABILITY STANDARD IRO-002-6**

Lauren Perotti
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
lauren.perotti@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF PROPOSED
RELIABILITY STANDARD IRO-002-6**

The North American Electric Reliability Corporation (“NERC”) hereby submits proposed Reliability Standard IRO-002-6 Reliability Coordination – Monitoring and Analysis. Proposed Reliability Standard IRO-002-6 reflects the addition of a regional Variance containing additional requirements applicable to Reliability Coordinators providing service to entities in the Western Interconnection. None of the continent-wide requirements have been changed from currently effective Reliability Standard IRO-002-5.¹

Proposed Reliability Standard IRO-002-6 (**Exhibit A**) is just, reasonable, not unduly discriminatory or preferential, and in the public interest. NERC also submits the associated implementation plan (**Exhibit B**), and the associated Violation Risk Factors and Violation Severity Levels (“VSLs”) (**Exhibit D**), as detailed in this filing.

This filing presents the technical basis and purpose of proposed Reliability Standard IRO-002-6, a summary of the development proceedings (**Section III.C** and **Exhibit E**), and a demonstration that the proposed Reliability Standard meets the Reliability Standards criteria (**Exhibit C**). Proposed Reliability Standard IRO-002-6 was approved by the WECC Board of Directors on March 6, 2019 and adopted by the NERC Board of Trustees on May 9, 2019.

¹ NERC submitted proposed Reliability Standard IRO-002-5 on March 10, 2017.

I. SUMMARY

At present, only one Reliability Coordinator, Peak Reliability, provides services in the Western Interconnection (excepting Alberta). In July 2018, Peak Reliability announced that it would cease operations at the end of December 2019. Over the course of 2018 and 2019, several entities have indicated that they will seek certification to perform the Reliability Coordinator function in their respective footprints in the Western Interconnection.

As the Western Interconnection prepares to transition to an environment in which more than one Reliability Coordinator will be providing services, focused coordination of these Reliability Coordinators will be of critical importance. To promote coordination among these Reliability Coordinators and help ensure reliability in the Western Interconnection, WECC developed the proposed regional Variance reflected in proposed Reliability Standard IRO-002-6. The WECC Variance consists of two new requirements in the IRO-002 Reliability Standard. These requirements provide that each Reliability Coordinator providing services in the Western Interconnection shall: (1) coordinate with other Reliability Coordinators to develop a common Western Interconnection-wide method to determine the modeling and monitoring of elements necessary for providing situational awareness; and (2) use the common method.

The regional Variance reflected in proposed Reliability Standard IRO-002-6 would help ensure coordination and consistency between multiple Reliability Coordinators operating within the Western Interconnection in 2020 and beyond. The regional Variance adds requirements beyond those required by the continent-wide Reliability Standard and is necessary for reliability in the Western Interconnection. The following filing presents the justification for the proposed Reliability Standard and supporting documentation.

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:

Lauren Perotti
Senior Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
lauren.perotti@nerc.net

III. BACKGROUND

The following background information is provided below: (a) an explanation of the WECC Regional Reliability Standards development process; and (b) a summary of the development process for the proposed Reliability Standard.

A. WECC Regional Reliability Standards Development Process

The WECC regional Variance reflected in proposed Reliability Standard IRO-002-6 was developed in an open and fair manner and in accordance with the WECC Reliability Standards Development Procedures (“RSDP”). WECC’s RSDP provides for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing Reliability Standards and thus addresses several of the Commission’s criteria for approving Reliability Standards. The development process is open to any person or entity that is an interested stakeholder. WECC considers the comments of all stakeholders, and a vote of stakeholders and the WECC Board of Directors is required to approve a WECC regional Variance to a Reliability Standard. NERC posts each regional Variance developed by a Regional Entity for an additional comment period. The NERC Board of Trustees must adopt the regional Variance before it is submitted to the applicable governmental authorities for approval.

B. Development of the WECC Variance in Proposed Reliability Standard IRO-002-6

As further described in **Exhibit E** hereto, WECC developed the regional Variance in proposed Reliability Standard IRO-002-6 in accordance with the WECC RSDP. The drafting team (**Exhibit F**) consisted of individuals with relevant expertise in the subject matter area and included representatives from Peak Reliability and several other entities that had expressed interest by that time in performing the Reliability Coordinator function in the Western Interconnection. On February 21, 2019, the WECC ballot body approved the regional Variance with a 100 percent affirmative vote at 89.7 percent quorum. The WECC Board of Directors approved the regional Variance on March 6, 2019. NERC posted the regional Variance for a 45-day comment period from March 7, 2019 through April 22, 2019. Commenters agreed that WECC's process was open, inclusive, balanced, transparent, and provided due process. The WECC regional Variance was added to the NERC IRO-002 Reliability Standard, and the new standard was assigned version number IRO-002-6. The NERC Board of Trustees adopted proposed Reliability Standard IRO-002-6 on May 9, 2019.

IV. JUSTIFICATION

Due to the unique physical characteristics of the Bulk-Power System in the Western Interconnection, events in one part of the Interconnection within one Reliability Coordinator Area can have significant impacts in other parts of the system in other Reliability Coordinator Areas. These impacts can extend beyond the physical boundaries of the neighboring Reliability Coordinator Areas. As the Western Interconnection transitions from a single Reliability Coordinator environment to a multiple Reliability Coordinator environment, it is important that the Reliability Coordinators employ modeling and monitoring practices to address these unique situational awareness challenges and that there is an appropriate degree of consistency in modeling

and monitoring strategies and approaches.

Proposed Reliability Standard IRO-002-6 contains a new regional Variance designed to promote coordination among multiple Reliability Coordinators providing services to entities operating in the Western Interconnection. The regional Variance requires a single Interconnection-wide modeling and monitoring methodology, which creates an effective reliability baseline for each Reliability Coordinator for its Real-time Assessments and Operational Planning Analyses to address the unique challenges in the Western Interconnection. The modeling and monitoring requirements set forth in the Variance represent a more stringent set of requirements for Reliability Coordinators beyond those found in the continent-wide requirements. The purpose, applicability, and requirements of the regional Variance are discussed in more detail below.

A. Purpose and Applicability

The stated purpose of the WECC regional Variance in proposed Reliability Standard IRO-002-6 is to “to develop a methodology that creates models for performing Operational Planning Analyses and Real-time Assessments.”² The WECC regional Variance is applicable to those Reliability Coordinators providing Reliability Coordinator services to entities operating within the Western Interconnection, regardless of where the Reliability Coordinator is physically located.

B. Proposed Requirements

The WECC regional Variance in proposed Reliability Standard IRO-002-6 contains two new requirements to help ensure that each Reliability Coordinator has sufficient operational awareness to maintain the reliability of its area. These requirements provide as follows:

- D.A.7.** Each Reliability Coordinator shall, in coordination with other Reliability Coordinators, develop a common Interconnection-wide methodology to determine the modeling and monitoring of BES and non-BES Elements that are internal and external to its Reliability Coordinator Area, necessary for

² See Exhibit A.

providing operational awareness of the impacts on Bulk Electric System Facilities within its Reliability Coordinator Area, including at a minimum:

- D.A.7.1.** A method for development, maintenance, and periodic review of a Western Interconnection-wide reference model to serve as the baseline from which Reliability Coordinator's operational models are derived;
- D.A.7.2** The impacts of Inter-area oscillations;
- D.A.7.3** A method to determine Contingencies included in analyses and assessments;
- D.A.7.4** A method to determine Remedial Action Schemes included in analyses and assessments;
- D.A.7.5** A method to determine forecast data included in analyses and assessments; and
- D.A.7.6** A method for the validation and periodic review of the Reliability Coordinator's operational model for steady state and dynamic/oscillatory system response.

- D.A.8.** Each Reliability Coordinator shall use the methodology developed in D.A.7.

The proposed requirements provide a results-based approach to helping ensure that Reliability Coordinators model and monitor those Elements necessary in order to provide operational awareness with their areas. Requirement D.A.7 requires a common Interconnection-wide methodology that shall include, at a minimum, certain features deemed to be necessary for operational awareness of potential impacts on Facilities within its area. The list of required features includes impacts of Inter-area oscillations and methods to determine Contingencies, Remedial Action Schemes, and forecast data included in analyses and assessments. The methodology must also include a method for the development, maintenance, and review of an Interconnection-wide reference model to serve as a baseline and a method to validate and review the Reliability Coordinator's operational model for steady state and dynamic/oscillatory system response. Requirement D.A.8 requires each Reliability Coordinator to use the common methodology.

In developing the proposed requirements, WECC considered that the common methodology approach described above provided significant benefits over and above an approach that would require each Reliability Coordinator to use a single specified model, such as the Western Interconnection model. The common methodology approach is consistent with NERC's results-based approach to Reliability Standards and provides an efficient and effective way of achieving the reliability objective of the Variance. Further, the proposed approach helps to ensure that only those essential modeling details are maintained, while allowing any unneeded data to be culled. The benefits of having Reliability Coordinator models that are no larger than necessary include: (1) enhanced performance of on-line applications; (2) reduced risk that data problems with Elements that are insensitive to the Reliability Coordinator footprint will cause convergence problems; (3) reduced risk that problems with Elements that are insensitive to the Reliability Coordinator footprint could cause false alarms or consume troubleshooting resources; and (4) reduced risk that errors from insensitive parts of the Interconnection could mask issues within the Reliability Coordinator footprint.

C. Enforceability of Proposed Reliability Standard IRO-002-6

Proposed Reliability Standard IRO-002-6 includes VRFs and VSLs. The VSLs provide guidance on the way that NERC will enforce the requirements of the proposed Reliability Standard. The VRFs are one of several elements used to determine an appropriate sanction when the associated requirement is violated. The VRFs assess the impact to reliability of violating a specific requirement. The VRFs and VSLs for the continent-wide requirements have not been changed. As demonstrated in **Exhibit D**, the VRFs and VSLs for the two new requirements in the

WECC regional Variance comport with NERC and Federal Energy Regulatory Commission (“FERC”) guidelines related to their assignment.

The proposed Reliability Standard also includes measures that support each requirement by clearly identifying what is required and how the requirement will be enforced. These measures help ensure that the requirements will be enforced in a clear, consistent, and non-preferential manner and without prejudice to any party.

V. EFFECTIVE DATE

The proposed implementation plan is provided in **Exhibit B** hereto. The proposed implementation plan provides that proposed Reliability Standard IRO-002-6 would become effective on the first day of the first quarter after regulatory approval, but no sooner than January 1, 2020. This implementation timeframe reflects consideration of the timeframes for the wind down of Peak Reliability and the start of operations for other Reliability Coordinators. This proposed timeline balances the need for prompt implementation of the WECC regional Variance while allowing sufficient time for the new Western Interconnection Reliability Coordinators to coordinate on the development of the required common methodology.

Respectfully submitted,

/s/ Lauren Perotti

Lauren Perotti
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
lauren.perotti@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

Date: June 10, 2019

EXHIBITS A-B and D-F

Introduction

The North American Electric Reliability Corporation (NERC) is responsible for ensuring that the Reliability Standards, Violation Risk Factors (VRF), Violation Severity Levels (VSL), definitions, Variances, and Interpretations developed by drafting teams are developed in accordance with NERC processes. These standards must also meet NERC’s benchmarks for Reliability Standards, as well as criteria for governmental approval.

The discussion below explains how the proposed Reliability Standard meets or exceeds the Reliability Standards criteria.

For purposes of this filing, the use of the term Reliability Standard is synonymous with Regional Variance, unless otherwise specified.

Designed for a Specific Goal

Proposed Reliability Standards must be designed to achieve a specified reliability goal.

, NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American bulk power systems. Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each standard serves a purpose in support of reliability of the North American bulk power systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no standard undermines reliability through an unintended consequence. NERC Reliability Principles¹

The purpose of the proposed WECC Regional Variance is:

“To develop a methodology that creates models for performing Operational Planning Analyses and Real-time Assessments.”

Of the eight NERC Reliability Principles, this standard addresses Reliability Principle 1, which states:

“Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.”

Technically Sound

Proposed Reliability Standards must contain a technically sound method to achieve the goal.

¹ NERC Reliability Principles

Standard Development

This proposed Reliability Standard was developed using the NERC and Western Electricity Coordinating Council (WECC) Reliability Standards Development Procedures (Procedures) in effect at each point in the process. Among other things, these processes include drafting of the standard by a drafting team composed of subject matter experts (SME); biographies of those SMEs are provided with this filing.

These processes also include repeated public iterative comment/response cycles whereby comments are received from the industry, and responses to those comments are provided by the drafting team.

Technically Sound

The proposed Regional Variance addresses the changing business climate wherein the Western Interconnection (WI) is transitioning from a single Reliability Coordinator (RC) located within the footprint of the WI to an unspecified number of RCs potentially operating anywhere across the continent. To address this change, the proposed Regional Variance has two requirements. Each RC providing services in the WI shall coordinate with other RCs to (1) develop and (2) use “a common Interconnection-wide methodology to determine the modeling and monitoring of BES and non-BES Elements” necessary for providing operational awareness of the impacts on Bulk Electric System Facilities.

In keeping with NERC’s goal to create performance-based standards, the proposed Regional Variance does not state how the RCs are to develop the methodology, nor does it state the required content.² These attributes are vested in the RCs directly, as the RC SMEs have the technical knowledge to address the myriad permutations of modeling and monitoring.

Applicability

Proposed Reliability Standards must be applicable to users, owners, and operators of the bulk power system, and not others.

The Applicability section of the proposed standard is as follows:

“As used in this WECC Regional Variance, Reliability Coordinator is specific to those Reliability Coordinators providing Reliability Coordinator service(s) to entities operating within the Western Interconnection, regardless of where the Reliability Coordinator may be located.”

² “Performance-Based—defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome?” Results Based Standards, <https://www.nerc.com/pa/Stand/Pages/ResultsBasedStandards.aspx>.

Clear and Unambiguous

Proposed Reliability Standards must be clear and unambiguous as to what is required and who is required to comply.

Requirement D.R1 of the proposed Regional Variance requires the RC to develop a modeling and monitoring methodology that identifies internal and external Elements “necessary for providing operational awareness of the impacts of Bulk Electric System Facilities.” In Posting 2 of the project, the drafting team grappled with the question as to what constitutes that which is “necessary” for inclusion. The drafting team’s response to that concern is as follows:

Finally, the drafting team [DT] recognizes that what constitutes “necessary” in [D.R1] is not specifically stated in the language of the [Regional Variance]. That was intentional. The DT was faced with the impossible task of defining the complete universe of what is “necessary” for each RC – present and future, known and unknown, and under all circumstances.

Since that which is necessary for one RC may not be the same as that which is necessary for another RC; and, whereas that which is necessary for one RC may vary over time, the DT concluded the best forum for that determination was during the coordinated development of the methodology.

In reaching this conclusion, the DT was also concerned that if “necessary” was defined in full, the final methodology would include more information than some RCs needed. The volume of data would slow computer processing and create the potential for models to go unsolved due to minutia (data noise). The solution was to require the RCs to coordinate their efforts and define what was necessary for each RC in that inclusive setting. Finally, the DT recognized that because the Regional Variance is forward-looking, the applicable RCs have not yet been identified. Rather than limit the reliability task to the knowledge base of the assigned DT, the Regional Variance will allow the full knowledge base of present and future RCs to be included in the development of the modeling and monitoring methodology.

Understandable Consequence

Proposed Reliability Standards must include clear and understandable consequences and a range of penalties (monetary and/or non-monetary) for a violation.

Violation Risk Factors (VRF) and Violation Severity Levels (VSL) were assigned for each of the two proposed requirements.

The VRFs for the proposed variance are as follows:

D.R1. (*Violation Risk Factor: High*) [*Time Horizon: Operations Planning*])

D.R2. (*Violation Risk Factor: High*) [*Time Horizon: Operations Planning*])

After reviewing the NERC Violation Risk Factors guidelines, the WECC-0135 Drafting Team set the VRF for both proposed requirements as “High.”

The “High” rating was set because failure to complete the assigned task could “directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures.”

The VSLs for the proposed variance are as follows:

D.R1. Severe

D.R2. Severe

The WECC-0135 DT set a “Severe” level because the assigned tasks are binary. It either must be performed or not; so, a graded level of severity is not warranted.

Measurability for Compliance

Proposed Reliability Standards must identify a clear and objective criterion or measure for compliance, so that it can be enforced in a consistent and non-preferential manner.

The measures for D.R1 and D.R2 are as follows:

D.M1. Each Reliability Coordinator will have evidence that it developed a common Western Interconnection-wide methodology, addressing modeling and monitoring, in coordination with other Reliability Coordinators, that includes the features required in D.R1.

D.M2. Each Reliability Coordinator will have evidence that it uses the methodology developed in D.R1, as required in D.R2. above.

Effective and Efficient

Proposed Reliability Standards should achieve a reliability goal effectively and efficiently - but does not necessarily have to reflect “best practices” without regard to implementation cost.

During the two posting periods, no concerns were raised regarding implementation costs or historical regional infrastructure.

The proposed Regional Variance reaches its goals effectively and efficiently by using existing business practices. As of this filing, forums are already created and actively pursuing the tasks required in the variance.

Lowest Common Denominator

Proposed Reliability Standards cannot be “lowest common denominator,” i.e., cannot reflect a compromise that does not adequately protect bulk power system reliability.

The proposed Regional Variance addresses an area not currently codified in NERC Standards.

Costs

Proposed Reliability Standards may consider costs to implement for smaller entities but not at consequence of less than excellence in operating system reliability.

During the development of the project, the industry raised no such concerns.

Continent-wide and Regional Variations

Proposed Reliability Standards must be designed to apply throughout North America to the maximum extent achievable with a single reliability standard while not favoring one area or approach.

In the Order 740 Remand at P4, FERC states that:

“Reliability Standards that the ERO proposes to the Commission may include Reliability Standards that are proposed to the ERO by a Regional Entity... When the ERO reviews a regional Reliability Standard that would be applicable on an interconnection-wide basis and that has been proposed by a Regional Entity organized on an interconnection-wide basis, the ERO must rebuttably presume that the regional Reliability Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest. In turn, the Commission must give “due weight” to the technical expertise of the ERO and of a Regional Entity organized on an interconnection-wide basis.”

Further, regional entities may propose Regional Reliability Standards that set more stringent reliability requirements than the NERC Reliability Standard or cover matters not covered by an existing NERC Reliability Standard. NERC Rules of Procedure, Section 312, Regional Reliability Standards.

The proposed Regional Variance is applicable only in the Western Interconnection.

The proposed Regional Variance covers matters not covered in an existing NERC Reliability Standard by requiring the development of an RC-coordinated methodology for Interconnection-wide system modeling and monitoring.

No Undue Negative Effect

Proposed reliability standards should cause no undue negative effect on competition or restriction of the grid.

The assigned drafting team does not foresee any negative impacts on competition resulting from the proposed Regional Variance.

During the development phase of this project, the industry raised no concerns regarding competition or restrictive use of the grid.

Implementation of New Requirements (Effective Date)

The implementation time for the proposed Reliability Standards must be reasonable.

In accordance with the WECC Reliability Standards Development Procedures, an implementation plan for the proposed Regional Variance was included with Posting 1 of this project. The Implementation Plan is included as Attachment F of this filing.

The proposed effective date for the WECC Regional Variance is “The first day of the first quarter after regulatory approval, but no sooner than January 1, 2020.” A January 1, 2020 effective date allows time for the winding down of Peak Reliability (serving as the primary Interconnection RC until December 31, 2019), other RCs to start up, and creates a window during which the RCs may create the methodology required.

Earlier compliance should not be pursued. If an earlier effective date is imposed, the time window could encompass the active operation of multiple RCs for which a coordinated handoff of responsibilities had not yet occurred. As proposed, the effective date allows the RCs a period to create the required methodology. An earlier effective date may not accommodate that need. No other retirements are required.

Fair and Open Process

The Reliability Standard development process must be open and fair.

WECC followed the WECC Reliability Standards Development Procedures (Procedures) in effect at the time of each step in the process.

In accordance with the Procedures, all drafting team meetings are open to the public.

All drafting team meetings were announced via the WECC Standards Email List for the period prescribed in the Procedures. Notice of the meetings was provided to NERC and posted on the WECC Calendar along with meeting minutes.

All meetings were supported by a telephone conference bridge associated with an on-line internet visual capability allowing all participants to see the document(s) as they were being developed. Further, this team held an open-mic Standards Briefing prior to balloting affording the industry an additional opportunity to have its questions addressed.

This project was posted twice for public comment at WECC.

Comments and the associated responses are currently posted on the WECC website, on the WECC-0135 project page, under the Submit and Review Comments accordion.³ Response to Comments forms were provided with this filing.

In addition to posting under the WECC Procedures, this project was also posted by NERC for 45-days in accordance with NERC's Rules of Procedure and NERC's internal business practices.

Balanced with Other Vital Interests

Proposed Reliability Standards must balance with other vital public interests.

NERC is not aware of any other vital public interests. No such balancing concerns were raised or noted.

Consideration of Other Facts

Proposed Reliability Standards must consider any other relevant factors.

NERC is not aware of any other general factors in need of consideration.

³ <https://www.wecc.org/Standards/Pages/WECC-0135.aspx>