

April 21, 2016

VIA OVERNIGHT MAIL

Sheri Young, Secretary of the Board
National Energy Board
517 – 10th Avenue SW
Calgary, Alberta
T2R 0A8

RE: *North American Electric Reliability Corporation*

Dear Ms. Young:

The North American Electric Reliability Corporation (“NERC”) hereby submits Notice of Filing of the North American Electric Reliability Corporation of Retirement of Regional Reliability Standard TOP-007-WECC-1a. 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.

Respectfully submitted,

/s/ Holly A. Hawkins

Holly A. Hawkins
*Associate General 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
NATIONAL ENERGY BOARD**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NOTICE OF FILING OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF RETIREMENT OF
REGIONAL RELIABILITY STANDARD TOP-007-WECC-1a**

Sandy Mooy
Associate General Counsel
Chris Albrecht
Legal Counsel
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, UT 84103
(801) 582-0353
calbrecht@wecc.biz
smooy@wecc.biz

*Counsel for the Western Electricity
Coordinating Council*

Charles A. Berardesco
Senior Vice President and General Counsel
Holly A. Hawkins
Associate General Counsel
Shamai Elstein
Senior Counsel
Gizelle Wray
Associate Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
charlie.berardesco@nerc.net
holly.hawkins@nerc.net
shamai.elstein@nerc.net
gizelle.wray@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

April 21, 2016

TABLE OF CONTENTS

I.	NOTICES AND COMMUNICATIONS	2
II.	BACKGROUND	2
A.	Procedural History	2
III.	JUSTIFICATION	3
A.	TOP-007-WECC-1a, Requirement R1 is Addressed by Continent Wide Reliability Standards	4
B.	TOP-007-WECC-1a, Requirement R2 is Addressed by Continent Wide Reliability Standards	8
IV.	EFFECTIVE DATE.....	11

EXHIBITS

Exhibit A	Implementation Plan
Exhibit B	Reliability Standards Criteria
Exhibit C	Summary of Retirement History and Complete Record of Retirement Development

**BEFORE THE
NATIONAL ENERGY BOARD**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NOTICE OF FILING OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF RETIREMENT
OF REGIONAL RELIABILITY STANDARD TOP-007-WECC-1a**

The North American Electric Reliability Corporation (“NERC”) hereby provides notice of the retirement of WECC regional Reliability Standard TOP-007-WECC-1a – System Operating Limits.¹ The primary purpose of this regional Reliability Standard is to ensure that actual flows and associated scheduled flows on major WECC transfer paths do not exceed System Operating Limits (“SOL”) for more than 30 minutes. As discussed below, however, the issues addressed by regional Reliability Standard TOP-007-WECC-1a are addressed by continent-wide Reliability Standards, making the regional Reliability Standard redundant and unnecessary. The retirement of regional Reliability Standard TOP-007-WECC-1a will thus have no adverse effect on reliability of the Bulk Power System and is in the public interest.

The WECC Board of Directors approved the retirement of TOP-007-WECC-1a on December 2, 2015. On February 11, 2016, the NERC Board of Trustees approved the retirement of the regional Reliability Standard.

¹ Unless otherwise designated herein, all capitalized terms shall have the meaning set forth in the *Glossary of Terms Used in NERC Reliability Standards*, available at http://www.nerc.com/files/Glossary_of_Terms.pdf.

I. NOTICES AND COMMUNICATIONS

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

Shamai Elstein
Senior Counsel
Gizelle Wray
Associate Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
shamai.elstein@nerc.net
gizelle.wray@nerc.net

Sandy Mooy
Associate General Counsel
Chris Albrecht
Legal Counsel
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, UT 84103
(801) 582-0353
calbrecht@wecc.biz
smooy@wecc.biz

II. BACKGROUND

A. Procedural History

On December 17, 2014, consistent with WECC's Reliability Standards Development Process, WECC staff submitted a Standards Authorization Request ("SAR") to retire TOP-007-WECC-1a. The SAR stated that the entire reliability-related substance of TOP-007-WECC-1a is redundant to NERC's continent-wide Reliability Standards and is no longer needed to support reliability in WECC. On January 8, 2015, the WECC Standards Committee approved the SAR and assigned a drafting team to review the regional Reliability Standard in comparison with current NERC Reliability Standards both in effect and those pending regulatory approval.²

On March 27, the WECC drafting team completed the review and posted their justification for retirement for a 45-day comment period. The drafting team received comments from three

² The drafting team consisted of representatives from PEAK Reliability, Arizona Public Service, Smart Wires, Inc., Tri-State Generation and Transmission Association, Colorado Springs Utility, Public Service Company of Colorado (Xcel Energy), and Bonneville Power Administration.

entities representing five of the eight WECC Standards Voting Sectors. After considering the comments, the drafting team modified its justification for retirement and posted it for a second 45-day comment period on July 1, 2015. After considering the comments on the second posting, the drafting team submitted the proposed retirement to the WECC Standards Committee for ballot.

On August 12, 2015, the WECC Standards Committee agreed with the Drafting Team's proposal to retire TOP-007-WECC-1a and posted it for ballot. On August 13, 2015, NERC posted the proposed retirement for a 45-day public comment period. On October 8, 2015, the WECC ballot was unanimously approved with no comments.

On December 2, 2015, the WECC Board of Directors approved the retirement of TOP-007-WECC-1a and submitted the proposal to the NERC Board of Trustees for approval. On February 11, 2016, the NERC Board of Trustees approved the retirement of TOP-007-WECC-1a.

III. JUSTIFICATION

As noted above, regional Reliability Standard TOP-007-WECC-1a, which consists of two Requirements, is designed to ensure that actual flows and associated scheduled flows on major WECC transfer paths do not exceed SOLs for more than 30 minutes. As explained below, however, the reliability need to ensure that Transmission Operators in the Western Interconnection do not exceed SOLs on major transfer paths and to take corrective action when necessary is adequately addressed by continent-wide Reliability Standards. Regional Reliability Standard TOP-007-WECC-1a is thus redundant and unnecessary and may be retired without creating any reliability issues in WECC.

The following is a detailed explanation of the manner in which the continent-wide

Reliability Standards address the reliability issues in TOP-007-WECC-1a.

A. TOP-007-WECC-1a, Requirement R1 is Addressed by Continent Wide Reliability Standards

Requirement R1 of TOP-007-WECC-1a provides that when the actual power flow exceeds an SOL for a Transmission path, the Transmission Operators must take immediate action to reduce the 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. The WECC drafting team determined, however, that a separate, regional Reliability Standard for Transmission Operators in the Western Interconnection is not necessary to address this reliability issue as it is adequately covered by continent-wide Reliability Standards currently in effect as well as the continent-wide Reliability Standards submitted on March 25, 2015³ that will supersede the currently-effective standards on April 1, 2017.

Specifically, currently-effective Reliability Standards TOP-002-2.1b, TOP-004-2, and TOP-008-1 collectively require Transmission Operators to: (1) plan not to exceed SOLs; (2) operate within all SOLs; (3) act to prevent violations of SOLs; and (4) take immediate action if an SOL is exceeded, as follows:

Plan to Meet SOLs: Similar to the requirement in TOP-007-WECC-1a, currently-effective Reliability Standard TOP-002-2.1b, Requirement R10 provides that Transmission Operators shall plan to meet all SOLs and Interconnection Reliability Operating Limits (“IROLs”). Further, TOP-002-2.1b R1, R4, R5, and R11, require relevant entities to coordinate to help ensure no SOL will be exceeded. Specifically, Transmission Operators are required to work with Balancing Authorities

³ See Notice of Filing of the North American Electric Reliability Corporation of Proposed Transmission Operations and Interconnection Reliability Operations and Coordination Reliability Standards (March 25, 2015).

to maintain plans to ensure reliable operations and the ability to meet scheduled system configuration.

Operate within SOLs: Currently-effective Reliability Standard TOP-004-2, Requirements R1, R2 and R3 provide that Transmission Operators shall operate within IROLs and SOLs so that instability, uncontrolled separation, or cascading outages will not occur. Further, under TOP-004-2, if a Transmission Operator enters an unknown operating state (i.e. any state for which valid operating limits have not been determined), it will be considered an emergency and the Transmission Operator is required to restore operations to the reliable power system limits within 30 minutes. TOP-004-2, Requirement R6 also requires Transmission Operators, individually and jointly with other Transmission Operators, to develop, maintain, and implement formal policies and procedures to provide for transmission reliability. These policies and procedures must address the execution and coordination of activities that impact inter- and intra-Regional reliability, including monitoring and controlling voltage levels, real and reactive power flows, switching transmission elements, planned outages of transmission elements, and responding to IROL and SOL violations. These requirements thus provide a greater level of planning on behalf of the Transmission Operators as compared to TOP-007-WECC-1a.

Act to Prevent and Mitigate SOL Exceedances: As with TOP-007-WECC-1a, the currently-effective continent-wide standards require Transmission Operators to take actions to mitigate SOL and IROL violations. Reliability Standard TOP-008-1 states that a 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. Further, Requirement R2 provides that

Transmission Operators shall operate to prevent the likelihood that a disturbance, action, or inaction will result in an IROL or SOL violation. Also, in instances where there is a difference in derived operating limits, the Transmission Operator must always operate the Bulk Power System to the most limiting parameter. Lastly, TOP-008-1, Requirement R3 provides that the Transmission Operator disconnect the affected facility if the overload on a transmission facility or abnormal voltage or reactive condition persists and equipment is endangered.

Reliability Standards TOP-001-3 and TOP-002-4, which supersede the currently-effective standard discussed above on April 1, 2017, will continue to cover these issues and support the retirement of the regional Reliability Standard. Reliability Standard TOP-001-3 is designed to prevent instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the Interconnection, in part, by ensuring that Transmission Operators operate within all SOLs and take prompt action to prevent or mitigate SOL exceedances. TOP-001-3 provides Transmission Operators with the authority to take action, or direct the actions of others, to maintain reliability during Real-time operations. The standard includes Real-time monitoring and Real-time assessment requirements to preserve reliability and ensure that applicable entities identify and address all SOL exceedances.

Specifically, TOP-001-3, Requirement R1 requires Transmission Operators to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions with same-day or Real-time operations time horizons. TOP-001-3, Requirement R10 also specifically requires a Transmission Operator to determine if there are any SOL exceedances (1) within its Transmission Operator Area by monitoring facilities and the status of Special Protection

Systems and (2) outside its Transmission Operator Area by obtaining and utilizing status, voltages, and flow data for facilities and the status of Special Protection Systems. Additionally, TOP-001-3, Requirement R13 requires Transmission Operators to ensure that a Real-time Assessment is performed at least once every 30 minutes and Requirement R14 requires each Transmission Operator to initiate its Operating Plan to mitigate an SOL exceedance identified as part of its Real-time monitoring or Real-time assessment. Finally, TOP-001-3, Requirement R18 provides that Transmission Operators must operate to the most limiting parameter in instances where there is a difference in SOLs. Collectively, the Requirements in TOP-001-3 address, in a similar manner as TOP-007-WECC-1a, the reliability need to ensure that Transmission Operators prevent exceedances of SOLs and take immediate actions if power flows exceed an SOL.

Additionally, the purpose of Reliability Standard TOP-002-4 is to help ensure that Transmission Operators and Balancing Authorities have plans for operating within specified limits. Similar to currently-effective TOP-004-2 and TOP-002-2.1b, TOP-002-4 addresses next-day planning and provides for the necessary notifications and coordination between various functional entities. TOP-002-4, Requirement R1 requires each Transmission Operator to 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 SOLs. TOP-002-4, Requirement R2 requires each Transmission Operator to have operating plans for next-day operations to address potential SOL exceedances identified as a result of its Operational Planning Analysis. Finally, TOP-002-4, Requirement R3 requires each Transmission Operator to notify entities identified in the Operating Plan required by Requirement R2 as to their role in those plans. This standard will thus further

ensure that Transmission Operators have plans to avoid operating with power flows exceeding SOLs.

B. TOP-007-WECC-1a, Requirement R2 is Addressed by Continent Wide Reliability Standards

Requirement R2 of TOP-007-WECC-1a requires a Transmission Operator to prevent the Net Scheduled Interchange (“NSI”) from exceeding an SOL when the Transmission Operator implements its Real-time schedules for the next hour. If the SOL decreases within 20 minutes before the start of the hour, the Transmission Operator is required to adjust the NSI within 30 minutes to the new SOL value. The WECC drafting team determined that Requirement R2 should be retired because: (1) Transmission Operators do not control NSI; and (2) coordination of Real-time schedules for the next-hour is covered in continent-wide Reliability Standards.

Transmission Operators Do Not Control Net Scheduled Interchange: The tasks assigned to the Transmission Operator in TOP-007-WECC-1a, Requirement R2 do not align with the roles and responsibilities described in the current version of the NERC Functional Model (“NERC FM”).⁴ The assignment of the Transmission Operator as the applicable entity to address NSI is now in conflict with the NERC FM because the TOP does not control NSI. Of the 22 relationships with other functional entities assigned to the Transmission Operator in the NERC FM, none address NSI or scheduling.⁵

⁴ The Version 5 of the NERC FM was published in May 12, 2010. Reliability Functional Model Technical Model Document, Version 5 (December 2009), *available at:* http://www.nerc.com/pa/Stand/Functional%20Model%20Archive%201/FM_Technical_Document_V5_2009Dec1.pdf.

⁵ NERC FM at p. 18. The NERC FM addresses how the relationships function between the Interchange Coordinator, Balancing Authorities, and Transmission Service Providers in regards to Interchange Transactions.

Specifically, an Interchange Schedule cannot take place without an Interchange Transaction. An Interchange Transaction is requested via a Request-for-Interchange, as required by the North American Energy Standards Board (NAESB) Business Practice Standards.⁶ The Request-for-Interchange is implemented via an Interchange Transaction Tag or e-Tag, and communicated by the Interchange Authority. Because the Transmission Operator is not part of the aforementioned chain, and whereas the Request-for-Interchange is generally submitted by the Purchasing-Selling Entity,⁷ and approved or denied by the Balancing Authority⁸ and Transmission Service Provider,⁹ it is not in the purview of the Transmission Operator to ensure the NSI does not exceed an SOL, nor is that a reliability issue since several Reliability Standards exist that require the Transmission Operator to operate within SOLs and to prevent and mitigate SOL exceedances, thus preserving the reliability aspect of the Bulk Power System.

In approved NERC Reliability Standard, INT-006-4, NSI is addressed by the Balancing Authority. The standard requires that responsible entities conduct a reliability assessment of each Arranged Interchange before it is implemented. INT-006-4, Requirement R1 requires that each Balancing Authority approve or deny each on time Arranged Interchange or emergency Arranged Interchange. Requirement R1 describes those circumstances when a Balancing Authority “must” deny an Arranged Interchange. The Balancing Authority has access to all of the information required to perform the assigned task and is, thus, the appropriate applicable entity to carry out the

⁶ North American Energy Standards Board conventions are not addressed in this filing.

⁷ See NAESB WEQ-004-1 and 004-2.

⁸ INT-006-4, Requirement R1.

⁹ INT-006-4, Requirement R2.

assigned task. By contrast, the Transmission Operator does not have access to each of these informational elements and therefore should not perform the assigned task.

Further, INT-006-4 R3 specifically addresses changes to the Arranged Interchange for reliability purposes. The requirement states that 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, and if the Balancing Authority denied the Reliability Adjustment Arranged Interchange, the Balancing Authority must communicate that fact to its Reliability Coordinator no more than 10 minutes after denial.

Coordination of Real-Time Schedules for the Next-Hour is Addressed in Continent-wide NERC Standards: Real-time schedules for the next-hour are addressed in currently-effective Reliability Standards TOP-002-2.1b and TOP-004-2. TOP-002-2.1b requires that current operations plans and procedures are being prepared for reliable operations, including response to unplanned events. Under TOP-002-2.1b, Requirement R4, the Transmission Operator is required to coordinate its current-day plans with the Reliability Coordinator. The current day plans must include Real-time operations (present time as opposed to future time), so that normal Interconnection operation can proceed in an orderly and consistent manner. Further, TOP-002-2.1b, Requirement R10 requires the Transmission Operator to plan to meet all SOLs and also to operate within SOLs when operating in Real-time, irrespective of scheduling practices. In addition, TOP-004-2, Requirement R1 requires Transmission Operators to operate within IROLs and SOLs. Finally, TOP-002-2.1b, Requirement R11 covers any situational awareness contained within TOP-007-WECC-1a Requirement R2 because it requires the Transmission Operator to perform cyclical

studies to determine potential changing SOLs.

Additionally, the TOP Reliability Standards submitted on March 25, 2015 will continue to address Real-time schedules. Reliability Standard, TOP-002-4, Requirement R1 requires the Transmission Operator to have Operational Planning Analysis to determine whether planned operations for next day will exceed SOLs and IROLs and Requirement R2 requires the Transmission Operator to develop Operating Plans that address potential SOL exceedances identified in its Operational Planning Analysis. In addition, Requirement R3 requires the Transmission Operator to notify entities identified in the Operating Plans as to their role in those plans. Further, Requirement R14 requires each Transmission Operator to initiate its Operating Plans to mitigate exceedances identified as part of its Real-time monitoring or Real-time Assessment. The Operating Plans are expected to include, among other things, company-specific system restoration plans that detail an operating procedure for blackstart units, and operating processes for communicating restoration progress with other entities.

IV. EFFECTIVE DATE

As the currently-effective continent-wide Reliability Standards address the issues in TOP-007-WECC-1a, the proposed implementation plan provides that the proposed retirement of TOP-007-WECC-1a be effective on the first day of the first quarter following appropriate regulatory approval. The retirement should be effective on April 1, 2017 to align the retirement of TOP-007-WECC-1a with the effective date for the modified TOP Reliability Standards submitted on March 25, 2015. Additionally, Peak Reliability (the Reliability Coordinator in the Western Interconnection) is scheduled to issue a revised SOL Methodology to support the retirement of

TOP-007-WECC-1a on October 1, 2016, with an effective date of April 1, 2017. Aligning these effective dates will allow the Transmission Operators in the WECC Region to efficiently transition to compliance with the continent-wide Reliability Standards without having to transition to two sets of TOP standards in a short period of time (i.e., moving from the TOP-007-WECC-1a to the currently-effective continent-wide Reliability Standards and then transitioning to the modified TOP standards submitted on March 25, 2015).

Respectfully submitted,

/s/ Gizelle Wray

Sandy Mooy
Associate General Counsel
Chris Albrecht
Legal Counsel
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, UT 84103
(801) 582-0353
calbrecht@wecc.biz
smooy@wecc.biz

*Counsel for the Western Electricity
Coordinating Council*

Charles A. Berardesco
Senior Vice President and General Counsel
Shamai Elstein
Senior Counsel
Gizelle Wray
Associate Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
charlie.berardesco@nerc.net
shamai.elstein@nerc.net
gizelle.wray@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

Date: April 21, 2016

EXHIBITS A and C

(Available on the NERC Website at

http://www.nerc.com/FilingsOrders/ca/Canadian%20Filings%20and%20Orders%20DL/Retirement%20for%20TOP-007-WECC-1a_exhibits.pdf)

EXHIBIT B

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. They must also meet NERC's benchmarks for Reliability Standards, as well as criteria for governmental approval.

The discussion below explains how the proposed retirement of the Regional Reliability Standard meets or exceeds the Reliability Standards criteria:

1. 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 NERC's reliability principles, thereby ensuring that each standard serves a purpose in support of reliability of the North American bulk power systems.

This project is designed to retire TOP-007-WECC-1a, System Operating Limits because the reliability-related substance is contained in other existing NERC Standards.

The principle on which the currently approved underlying NERC Standard is premised is as follows:

- **Reliability Principle 1** — Interconnected Bulk Electric Systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.

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

The proposed Reliability Standard must be designed to achieve a specified reliability goal and must contain a technically sound means to achieve this goal. Although any person may propose a topic for a Reliability Standard to the Electric Reliability Organization (ERO), in the ERO's process, the specific proposed Reliability Standard should be developed by persons within the electric power industry and community who have a high level of technical expertise and it should be based on sound technical and engineering criteria. It should be based on actual data and lessons learned from past operating incidents, where appropriate. The process for ERO approval of a proposed Reliability Standard should be fair and open to all interested persons.

Standard Development

This request to retire currently approved NERC Standard TOP-007-WECC-1a, System Operating Limits, was developed using the NERC and WECC Standards development processes.

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 considered by the drafting team, and responses to those comments are provided by the drafting team.

Technically Sound

A detailed analysis of existing NERC Standards as well as those approved and pending regulatory approval was conducted by the WECC-0111 drafting team. That technical analysis is included in this filing as Attachment B1, Supporting Narrative and Crosswalk to Retire, Section 1: Tabular Crosswalk and Section 2: Supporting Narrative. Those sections depict where the reliability-related substance is already covered as well as a narrative describing that conclusion.

3. Proposed Reliability Standards must be applicable to users, owners, and operators of the Bulk-Power System, and not others.

The proposed Reliability Standard may impose a requirement on any user, owner, or operator of such facilities, but not on others.

TOP-007-WECC-1a, System Operating Limits applies only to applicable entities, stated in the standard as follows:

“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:

<https://www.wecc.biz/Reliability/TableMajorPaths4-28-08.pdf>”

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

The proposed Reliability Standard should be clear and unambiguous regarding what is required and who is required to comply. Users, owners, and operators of the Bulk Power System must know what they are required to do to maintain reliability.

Each Requirement identifies the specific applicable entity assigned to an associated task. Each Requirement follows the typical NERC drafting construct that, “Each [Applicable Entity] shall [perform the assigned task] [and, where applicable, under what stated circumstances].”

Although this filing does not propose any added regulatory language, the drafting team made every endeavor to ensure the narrative describing its rationale for retirement of TOP-001-WECC-1a, System Operating Limits was clear and unambiguous.

The project was posted for comment on two different occasions. In Posting 1, three respondents submitted comments. In Posting 2, only one respondent provided a comment. None of the comments received indicated a concern with the clarity of the language or raised any question as to the intent of the project.

The project was also posted at NERC for a 45-day comment period. All respondents reported the project was developed in an open, inclusive, balanced and transparent manner, and that the process afforded adequate due process.

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

This project is designed to retire TOP-007-WECC-1a, System Operating Limits because the reliability-related substance is contained in other existing NERC Standards. As such, addition or modification of compliance elements was not required.

6. Proposed Reliability Standards must identify clear and objective criteria or measures for compliance, so that they can be enforced in a consistent and non-preferential manner.

This project is designed to retire TOP-007-WECC-1a, System Operating Limits because the reliability-related substance is contained in other

existing NERC Standards. As such, addition or modification of measures was not required.

- 7. 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.**

This project is designed to retire TOP-007-WECC-1a, System Operating Limits because the reliability-related substance is contained in other existing NERC Standards. Because the reliability-related tasks are already being performed in accordance with other reliability standards there should be no adverse reliability or financial impact as a result of immediately implementing the retirement of the standard.

- 8. Proposed Reliability Standards cannot be “lowest common denominator,” meaning that they cannot reflect a compromise that does not adequately protect bulk power system reliability.**

The proposed Reliability Standard must not simply reflect a compromise in the ERO’s Reliability Standard development process based on the least effective North American practice — the so-called “lowest common denominator” — if such practice does not adequately protect Bulk Power System reliability.

This project is designed to retire TOP-007-WECC-1a, System Operating Limits because the reliability-related substance is contained in other existing NERC Standards. Because the reliability-related tasks are already being performed there is no proposed change to the level of reliability or to the practices in place to achieve the existing level of reliability; thus, there is no lower of the standard and no migration to a lowest common denominator.

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

A proposed Reliability Standard may take into account the size of the entity that must comply with the Reliability Standard and the cost to those entities of implementing the proposed Reliability Standard. However, the ERO should not propose a “lowest common denominator” Reliability Standard that would achieve less than excellence in operating system reliability solely to protect against reasonable expenses for supporting this vital national infrastructure. For example, a small owner or operator of the Bulk Power System must bear the cost of complying with each Reliability Standard that applies to it.

This project is designed to retire TOP-007-WECC-1a, System Operating Limits because the reliability-related substance is contained in other existing NERC Standards. Because the reliability-related tasks are already being performed there should be no adverse reliability or financial impact as a result of immediately implementing the retirement of the standard. None of the respondents reported any concerns regarding the financial impact of retiring the document.

10. 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.

A proposed Reliability Standard should be designed to apply throughout the interconnected North American Bulk Power System, to the maximum extent this is achievable with a single Reliability Standard. The proposed Reliability Standard should not be based on a single geographic or regional model, but should take into account geographic variations in grid characteristics, terrain, weather, and other such factors. It should also take into account regional variations in the organizational and corporate structures of transmission owners and operators, variations in generation fuel type and ownership patterns, and regional variations in market design - if these affect the proposed Reliability Standard.

This project is designed to retire TOP-007-WECC-1a, System Operating Limits, a Regional Reliability Standard. If the retirement is approved, the reliability-related tasks will continue to be performed in accordance with other currently approved NERC Standards that are applicable across the continent. This project eliminates a regional standard that duplicates existing NERC Reliability Standard requirements.

11. Proposed Reliability Standards should cause no undue negative effect on competition or restriction of the grid.

The ERO should attempt to develop a proposed Reliability Standard that has no undue negative effect on competition. Among other possible considerations, a proposed Reliability Standard should not unreasonably restrict available transmission capability on the Bulk Power System beyond any restriction necessary for reliability and should not limit use of the Bulk Power System in an unduly preferential manner. It should not create an undue advantage for one competitor over another.

This project is designed to retire TOP-007-WECC-1a, System Operating Limits because the reliability-related substance is contained in other existing NERC Standards. Because the reliability-related tasks are already being performed in accordance with other currently-approved NERC Standards, there should be no undue negative effect on competition or restriction of the grid.

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

This project is designed to retire TOP-007-WECC-1a, System Operating Limits because the reliability-related substance is contained in other existing NERC Standards. Because the reliability-related tasks are already being performed in accordance with other currently-approved NERC Standards, immediate retirement of the standard should be seamless.

13. The Reliability Standard development process must be open and fair.

In developing its request to retire TOP-007-WECC-1a, WECC followed the WECC Reliability Standards Development Procedures (Procedures).

All meetings were open to the public.

Between March 11 and August 6, 2015, the WECC-0111 drafting team conducted eight open meetings. Notice of the meetings was provided to NERC, posted on WECC's website, and embedded in the minutes of each meeting. Meeting minutes are posted on the WECC's website and accessible by the public.

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.

The proposed project was posted for public comment by WECC on two different occasions and by NERC on one additional occasion. Comments were solicited, received, considered, and answered. Comments and their responses are included with this filing and are currently located at the WECC-0111 TOP-007-WECC-1a Request to Retire Project Page on the Submit and Review Comments accordion.

**Reliability Standards Criteria
WECC-0111 TOP-007-WECC-1a
System Operating Limits**

While posted at NERC for 45-day comment, respondents were unanimously in accord that the development process was open, inclusive, balanced, transparent, and that the process afforded adequate due process.

14. Proposed Reliability Standards must balance with other vital public interests.

NERC is not aware of any vital public interests impacted by retirement of this standard. No such balancing concerns were raised or noted.

15. Proposed Reliability Standards must consider any other relevant factors.

This project is designed to retire TOP-007-WECC-1a, System Operating Limits because the reliability-related substance is contained in other existing NERC Standards. Because the reliability-related tasks are already being performed in accordance with other currently-approved NERC Standards, retirement of this standard should be seamless to the industry.