UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	**)** **)**	**Docket Nos. RM09-15-____**

JOINT PETITION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION AND WESTERN ELECTRICITY COORDINATING COUNCIL FOR APPROVAL OF WECC REGIONAL RELIABILITY STANDARD IRO-006-WECC-2 — QUALIFIED TRANSFER PATH UNSCHEDULED FLOW ("USF") RELIEF AND WECC REGIONAL DEFINITION OF "RELIEF REQUIREMENT"

Gerald W. Cauley
President and Chief Executive Officer
North American Electric Reliability Corporation
3353 Peachtree Road, N.E.
Suite 600, North Tower
Atlanta, GA 30326
(404) 446-2560
(404) 446-2595– facsimile

Charles A. Berardesco
Senior Vice President and General Counsel
Holly A. Hawkins
Assistant General Counsel
Stacey Tyrewala
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099– facsimile
charlie.berardesco@nerc.net
holly.hawkins@nerc.net
stacey.tyrewala@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

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EXHIBITS

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The North American Electric Reliability Corporation ("NERC")[1] hereby requests the Federal Energy Regulatory Commission ("FERC" or the "Commission") approve, in accordance with Section 215(d)(1) of the Federal Power Act ("FPA")[2] and Section 39.5 of the Commission's regulations, 18 C.F.R. § 39.5, proposed regional Reliability Standard, IRO-006-WECC-2 and proposed regional definition of "Relief Requirement" included in **Exhibit A**.[3] The Western Electricity Coordinating Council ("WECC") supports the filing of this petition.[4] This proposed regional Reliability Standard is intended to mitigate transmission overloads due to unscheduled flow on a transfer path designated by WECC as being qualified for unscheduled flow mitigation. The proposed regional definition supports the regional Reliability Standard.

The proposed regional Reliability Standard and regional definition will be in effect only for applicable registered entities within the WECC region. NERC proposes an effective date for

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[1] NERC has been certified by the Commission as the Electric Reliability Organization ("ERO") authorized by Section 215 of the Federal Power Act. The Commission certified NERC as the ERO in its order issued July 20, 2006 in Docket No. RR06-1-000. *North American Electric Reliability Corp.*,116 FERC ¶ 61,062 (2006) ("ERO Certification Order).

[2] 16 U.S.C. 824o.

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

[4] As the Regional Entity who developed proposed regional Reliability Standard IRO-006-WECC-2, WECC joins and supports NERC's petition, thereby making WECC a party in this proceeding.

both the regional Reliability Standard and the definition, of either: (1) the first day of the first quarter at least 45 days after regulatory approval or (2) upon complete implementation of applicable webSAS changes[5] and Commission approval of this proposed Reliability Standard and the revised Unscheduled Flow Mitigation Plan documents, whichever is later in time. The revised Unscheduled Flow Mitigation documents are being submitted by PacifiCorp simultaneously with the instant filing, although in a separate docket. The proposed regional Reliability Standard and regional definition were approved by the NERC Board of Trustees during its February 7, 2013 meeting.

Exhibit A to this filing sets forth the proposed regional Reliability Standard, regional definition, and implementation plan. **Exhibit B** to this filing provides a response to requirements of Commission Order No. 672,[6] including the additional criteria required for regional Reliability Standards. **Exhibit C** contains the complete Development Record for the proposed regional Reliability Standard and definition. **Exhibit D** includes the standard drafting team roster. **Exhibit E** is the Violation Severity Level ("VSL") and Violation Risk Factor ("VRF") guideline analysis.

I. EXECUTIVE SUMMARY

The purpose of proposed Reliability Standard IRO-006-WECC-2 is to provide a regional Reliability Standard that specifies the mitigation of transmission overloads due to unscheduled

[5] WebSAS is a software program that provides prescriptions for curtailments of off-path schedules based on level and percent of unscheduled flow contribution to the Qualified Path that is equal to or in excess of a six-percent Transfer Distribution Factor of each contributing schedule. The webSAS tool calculates curtailment and unless the Reliability Coordinator actively denies the request, approves the curtailment within five minutes.

[6] The Commission specified in Order No. 672 certain general factors it would consider when assessing whether a particular Reliability Standard is just and reasonable. *See Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, FERC Stats. & Regs. ¶ 31,204, at P 262, 321–37, *order on reh'g*, Order No. 672-A, FERC Stats. & Regs. ¶ 31,212 (2006).

flow on Qualified Transfer Paths.[7] The Commission approved regional Reliability Standard IRO-006-WECC-1 and the associated definition of "Relief Requirement" in Order No. 746.[8]

The currently-effective regional Reliability Standard IRO-006-WECC-1 has two Requirements. Requirement R1 provides that, upon receiving a request for curtailment from the Transmission Operator of a Qualified Transfer Path, the Reliability Coordinator shall approve or deny that request within five minutes. Requirement R2 provides that "[t]he Balancing Authorities shall approve curtailment requests to the schedules as submitted, implement alternative actions, or a combination there of [sic] that collectively meets the Relief Requirement."

The modifications in proposed regional Reliability Standard IRO-006-WECC-2 correct a reference to the recently changed[9] Unscheduled Flow Mitigation Plan ("UFMP"), a portion of which is included as an attachment to the currently-effective regional Reliability Standard IRO-006-WECC-1. Changes to the UFMP resulted in the new Unscheduled Flow Reduction Guideline ("UFRG"). Both the currently-effective version (IRO-006-WECC-1) and the proposed version (IRO-006-WECC-2) of the regional Reliability Standard use the term "Relief Requirement" which is defined in the WECC regional definitions section of the *Glossary of*

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[7] The term "Qualified Transfer Path" is defined as "A transfer path designated by the WECC Operating Committee as being qualified for WECC unscheduled flow mitigation." *See Glossary of Terms Used in NERC Reliability Standards* available at: http://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary_of_Terms.pdf. Updated April 5, 2013

[8] *Western Electric Coordinating Council, Qualified Transfer Path Unscheduled Flow Relief Regional Reliability Standard*, 134 FERC ¶ 61,199 (2011)("Order No. 746").

[9] Commission Order Nos. 888 and 890, as well as Order Nos. 713-A and 713-B, discuss the relationship between curtailment actions placed upon transmission schedules and transmission service priority. *Modification of Interchange and Transmission Loading Relief Reliability Standards; and Electric Reliability Organization Interpretation of Specific Requirements of Four Reliability Standards*, Order No. 713, 124 FERC ¶ 61,071 (2008), Order No. 713-A, 126 FERC ¶ 61,252 (2009); Order No. 713-B, 130 FERC ¶ 61,032 (2010). To bring the WECC Unscheduled Flow Reduction Guideline (UFRG) into compliance with these orders, on January 25, 2012, the Unscheduled Flow Administrative Subcommittee approved changes to the UFRG. These changes were subsequently approved by the operating committee (March 9, 2012) and the WECC Board of Directors (March 15, 2012).

Terms Used in NERC Reliability Standards. The proposed revision to the WECC regional definition of the term "Relief Requirement" also corrects a reference to the UFMP.

While the Requirements of the regional Reliability Standard have not changed, certain wording and format changes are proposed to bring the document into compliance with NERC drafting conventions for Reliability Standards, consistent with prior Commission precedent.[10]

As noted above, the proposed modifications to regional Reliability Standard IRO-006-WECC-2 are minor and the Reliability Standard remains more stringent than the corresponding continent-wide NERC Reliability Standard, IRO-006. The proposed regional Reliability Standard goes beyond the corresponding NERC Reliability Standard by requiring a Reliability Coordinator to approve or deny a Transmission Operator's curtailment request within five minutes and is necessitated by physical differences in the Western Interconnection, as explained below.

NERC Reliability Standard IRO-006 establishes a Transmission Loading Relief ("TLR") process for use in the Eastern Interconnection to alleviate loadings on the system by curtailing or changing transactions based on their priorities and according to different levels of TLR procedures. Requirement R1 of Reliability Standard IRO-006-5 provides that:

> Each Reliability Coordinator and Balancing Authority that receives a request pursuant to an Interconnection-wide transmission loading relief procedure (such as Eastern Interconnection TLR, *WECC Unscheduled Flow Mitigation*, or congestion management procedures from the ERCOT Protocols) from any Reliability Coordinator, Balancing Authority, or Transmission Operator in another Interconnection to curtail an Interchange Transaction that crosses an Interconnection boundary shall comply with the request, unless it provides a reliability reason to the requestor why it cannot comply with the request. (emphasis added).

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[10] *North American Electric Reliability Corp.*, 119 FERC ¶ 61,260 at P 55 (2007)("it is important that regional Reliability Standards and NERC Reliability Standards achieve a reasonable level of consistency in the structure of a Reliability Standard so that there is a common understanding of the elements.").

The WECC Unscheduled Flow Mitigation Plan provides detailed instructions for addressing unscheduled flows, *i.e.*, parallel path flows, based on the topography and configuration of the Bulk-Power System in the Western Interconnection.

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:[11]

Gerald W. Cauley
President and Chief Executive Officer
North American Electric Reliability Corporation
3353 Peachtree Road, N.E.
Suite 600, North Tower
Atlanta, GA 30326
(404) 446-2560
(404) 446-2595– facsimile

Charles A. Berardesco*
Senior Vice President, General Counsel and Corporate Secretary
Holly A. Hawkins*
Assistant General Counsel
Stacey Tyrewala **
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099– facsimile
charlie.berardesco@nerc.net
holly.hawkins@nerc.net
stacey.tyrewala@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

[11] Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of the Commission's rules and regulations to permit the inclusion of more than two people on the service list.

III. BACKGROUND

A. Procedural Background

1. NERC Reliability Standard IRO-006

On March 16, 2007, the Commission issued Order No. 693 approving 83 Reliability Standards proposed by NERC, including Interconnection Reliability Operations and Coordination ("IRO") Reliability Standard IRO-006-3, titled "Reliability Coordination – Transmission Loading Relief." On March 19, 2009, the Commission approved Reliability Standard IRO-006-4, which modified the prior version and addressed the Commission's directives from Order No. 693.[12] The Commission subsequently accepted an erratum to that Reliability Standard that corrected the reference in Requirement R1.2 to the Unscheduled Flow Mitigation Plan (Mitigation Plan). In April 2011, the Commission approved Reliability Standard IRO-006-5.[13]

2. Reliability Standard IRO-006-WECC

On June 8, 2007, the Commission approved eight WECC regional Reliability Standards that apply in the Western Interconnection, including IRO-STD-006-0.[14] The Commission approved revisions to Reliability Standard IRO-STD-006-0 which was re-named as IRO-006-WECC-1, and six associated definitions, including "Relief Requirement," in Order No. 746.[15]

B. Regulatory Framework

By enacting the Energy Policy Act of 2005,[16] Congress entrusted the Commission with the duties of approving and enforcing rules to ensure the reliability of the Nation's Bulk-Power

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[12] Order No. 713-A, 126 FERC ¶ 61,252 (2009), *order on reh'g*, Order No. 713-B, 130 FERC ¶ 61,032 (2010).

[13] *North American Electric Reliability Corp.*, 135 FERC ¶ 61,043 (2011).

[14] *North American Electric Reliability Corp.*, 119 FERC ¶ 61,260 (2007).

[15] *Western Electric Coordinating Council, Qualified Transfer Path Unscheduled Flow Relief Regional Reliability Standard*, 134 FERC ¶ 61,199 (2011)("Order No. 746").

[16] 16 U.S.C. § 824o (2006).

System, and with the duties of certifying an ERO that would be charged with developing and enforcing mandatory Reliability Standards, subject to Commission approval. Section 215(b)(1)[17] of the FPA states that all users, owners, and operators of the Bulk-Power System in the United States will be subject to Commission-approved Reliability Standards. Section 215(d)(5)[18] of the FPA authorizes the Commission to order the ERO to submit a new or modified Reliability Standard. Section 39.5(a)[19] of the Commission's regulations requires the ERO to file with the Commission for its approval each Reliability Standard that the ERO proposes should become mandatory and enforceable in the United States, and each modification to a Reliability Standard that the ERO proposes should be made effective.

The Commission has the regulatory responsibility to approve Reliability Standards that protect the reliability of the Bulk-Power System and to ensure that such Reliability Standards are just, reasonable, not unduly discriminatory or preferential, and in the public interest. Pursuant to Section 215(d)(2) of the FPA[20] and Section 39.5(c)[21] of the Commission's regulations, the Commission will give due weight to the technical expertise of the ERO with respect to the content of a Reliability Standard.

A regional Reliability Standard proposed by a Regional Entity must meet the same standards that NERC's Reliability Standards must meet, *i.e.*, the regional Reliability Standard must be shown to be just, reasonable, not unduly discriminatory or preferential, and in the public interest.[22] Order No. 672 also requires additional criteria that a regional Reliability Standard must satisfy: a regional difference from a continent-wide Reliability Standard must either be (1)

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17 *Id.* § 824(b)(1).
18 *Id.* § 824o(d)(5).
19 18 C.F.R. § 39.5(a) (2012).
20 16 U.S.C. § 824o(d)(2).
21 18 C.F.R. § 39.5(c)(1).
22 Section 215(d)(2) of the FPA and 18 C.F.R. §39.5(a).

more stringent than the continent-wide Reliability Standard (which includes a regional standard that addresses matters that the continent-wide Reliability Standard does not), or (2) a regional Reliability Standard that is necessitated by a physical difference in the Bulk Power System.[23]

As discussed in the *WECC Reliability Standards Development Procedures*,[24] WECC's Reliability Standards are developed according to the following characteristics:

- Open access by eligible voters to all aspects of the Standard Development process;
- Drafting by Subject Matter Experts that accept and respond to all public input; and
- Formal approval process involving response to input and final vote by the WECC Ballot Pool and WECC Board of Directors.

Proposed WECC Reliability Standards are subject to approval by NERC, as the ERO, and the Commission before becoming mandatory and enforceable under Section 215 of the FPA.[25] Applicable users, owners, and operators of the Bulk-Power System must adhere to the NERC Reliability Standards in addition to the WECC regional Reliability Standards. WECC regional Reliability Standards are enforced through the WECC Compliance Enforcement Program.

IV. JUSTIFICATION FOR APPROVAL OF PROPOSED REGIONAL RELIABILITY STANDARD AND REGIONAL DEFINITION

This section describes the reliability objectives to be achieved by the proposed regional Reliability Standard and regional definition, explains the development history, and demonstrates how the proposed Reliability Standard and definition meet the Commission's criteria for approval, as supplemented by **Exhibit B**. NERC, in its analysis and approval of the proposed

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[23] Order No. 672 at P 291.

[24] The *WECC Reliability Standards Development Procedure* is available at: http://www.wecc.biz/library/WECC%20Documents/Business%20and%20Governance%20Documents/WECC%20Reliability%20Standards%20Development%20Procedures.pdf

[25] 16 U.S.C. 824o.

regional Reliability Standard and regional definition, determined that the Reliability Standard as proposed is just, reasonable, not unduly discriminatory or preferential, and in the public interest.

A. Basis and Purpose of Standard IRO-006-WECC-2 — Qualified Transfer Path Unscheduled Flow ("USF") Relief

The proposed regional Reliability standard, IRO-006-WECC-2 — Qualified Transfer Path Unscheduled Flow ("USF") Relief, will provide regional requirements for Qualified Transfer Path Unscheduled Flow ("USF") Relief to applicable entities in WECC. It is developed to provide mitigation of transmission overloads due to unscheduled flow on Qualified Transfer Paths. The proposed changes in regional Reliability Standard IRO-0006-WECC-2 revise the currently-effective Reliability Standard to correct a reference to the recently changed[26] Unscheduled Flow Reduction Guideline ("UFRG") that is included as an attachment to Reliability Standard IRO-006-WECC-1. While the requirements within the proposed regional Reliability Standard have not changed, certain wording and format changes are included to bring the document into compliance with specific NERC drafting conventions. These proposed modifications include the following:

- (1) Effective date – this is necessary to accommodate needed software changes;
- (2) The reference to "Step 4" in Requirement R1 has been removed along with Attachment 1 and replaced with a reference to a request for unscheduled flow transmission relief along with a non-substantive sentence structure change to match NERC drafting conventions;

(3) A non-substantive grammatical change has been made to Requirement R2 and Measure M2 to conform to NERC drafting conventions.

[26] Commission Order Nos. 888 and 890, as well as Order Nos. 713-A and 713-B and Commission docket RM10-9-000, discuss the relationship between curtailment actions placed upon transmission schedules and transmission service priority. To bring the WECC Unscheduled Flow Reduction Guideline ("UFRG") into compliance with these orders, on January 25, 2012, the WECC Unscheduled Flow Administrative Subcommittee approved changes to the UFRG. These changes were subsequently approved by the Operating Committee (March 9, 2012) and the WECC Board of Directors (March 15, 2012).

Similarly, the Violation Severity Level ("VSL") section has been changed to match the current NERC table format with only one substantive change in the VSL for R1. This change is to conform to the Commission VSL guidelines that require binary VSLs to be set to "severe."[27] Specifically, currently-effective regional Reliability Standard IRO-006-WECC-1, Requirement R1states:

> **R1.** Upon receiving a request of Step 4 or greater (see Attachment 1-IRO-006-WECC-1) from the Transmission Operator of a Qualified Transfer Path, the Reliability Coordinator shall approve (actively or passively) or deny that request within five minutes. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*

Proposed regional Reliability Standard IRO-006-WECC-2, Requirement R1 states:

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

Requirement R1 was changed to remove the reference to a specific version of the WECC UFRG and replace it with a reference to a request for unscheduled flow transmission relief to remove the need to modify the regional Reliability Standard if at any time in the future it is deemed necessary to revise the WECC UFRG. However, the substantive requirement for the Reliability Coordinator to approve or deny a request from the Transmission Operator for unscheduled flow relief has not changed.

Similarly, Requirement R2 has been modified, but remains substantively unchanged. Currently-effective regional Reliability Standard IRO-006-WECC-1, Requirement R2 states:

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[27] *North American Electric Reliability Corp*., Order on Violation Severity Levels Proposed by the Electric Reliability Organization, 123 FERC ¶ 61,284 at P 25(2008)("the Commission believes that for requirements where an applicable entity either complies or does not, there is no basis to have more than one Violation Severity Level."), *order on rehearing and clarification*, 125 FERC ¶ 61,212(2008).

> **R2.** The Balancing Authorities shall approve curtailment requests to the schedules as submitted, implement alternative actions, or a combination there of that collectively meets the Relief Requirement. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*

Proposed regional Reliability Standard IRO-006-WECC-2, Requirement R2 states:

> **R2.** Each Balancing Authority shall perform any combination of the following actions meeting the Relief Requirement upon receiving a request for relief as described in Requirement R1: *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
>
> - Approve curtailment requests to the schedules as submitted
> - Implement alternative actions

The structure of Requirement R2 was changed to match NERC drafting conventions but the requirement for the Balancing Authority to provide the required relief, either through curtailment requests or alternative actions has not changed. The proposed regional Reliability Standard is included in **Exhibit A** to this filing.

Changes to the NERC Glossary for the WECC regional definition of "Relief Requirement" are also proposed for Commission approval. The current definition is as follows:

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

The standard drafting team is proposing the following change to the above definition to eliminate the incorporation by reference of an extrinsic document (*i.e.*, Attachment 1 of WECC IRO-006 WECC-1):

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

Similar to the changes in proposed Reliability Standard IRO-006-WECC-2, the proposed change to the regional definition of "Relief Requirement" removes the reference to a specific version of the WECC UFRG and would eliminate the need to modify the regional definition if at any time in the future it is deemed necessary to revise the WECC UFRG.

B. Development History

The complete development record for the proposed regional Reliability Standard and definition is provided in **Exhibit C** and includes the development and approval process, comments received during the industry-wide comment period, responses to those comments, ballot information, and NERC's evaluation of the proposed Reliability Standard. The proposed WECC regional Reliability Standard and definition were developed in an open, transparent, and inclusive fashion as demonstrated in **Exhibit C**. Proposed changes were prepared by a standard drafting team consisting of members as shown in **Exhibit D**. The proposed Reliability Standard and definition are widely supported by the WECC ballot pool, was approved by the WECC Standards Committee for consideration by the WECC Board of Directors, and approved by the WECC Board of Directors and NERC as a meaningful and necessary step forward in solving a longstanding problem.

V. ENFORCEABILITY OF THE PROPOSED REGIONAL RELIABILITY STANDARD

The proposed regional Reliability Standard contains both Violation Risk Factors ("VRFs") and Violation Severity Levels ("VSLs"). VRFs and VSLs are assigned to each requirement in the proposed Reliability Standard. The VRFs and VSLs for this proposed Reliability Standard were developed and reviewed for consistency with NERC and Commission

guidelines.[28] Analyses of the assigned VRFs and VSLs to this proposed Reliability Standard are included in **Exhibit E**.

[28] *See Order on Violation Risk Factors*, 119 FERC ¶ 61,145 (2007) and *Order on Violation Severity Levels Proposed by the Electric Reliability Organization*, 123 FERC ¶ 61,284 (2008).

VI. CONCLUSION

For the reasons stated above, NERC respectfully requests that the Commission approve the proposed regional Reliability Standard IRO-006-WECC-2 and regional definition, and the associated proposed VRFs and VSLs included in this filing. NERC requests that these approvals be made effective in accordance with the implementation plan for IRO-006-WECC-2 included in **Exhibit A** to this filing.

Respectfully submitted,

/s/ Stacey Tyrewala

Gerald W. Cauley
President and Chief Executive Officer
North American Electric Reliability Corporation
3353 Peachtree Road, N.E.
Suite 600, North Tower
Atlanta, GA 30326
(404) 446-2560
(404) 446-2595– facsimile

Charles A. Berardesco
Senior Vice President and General Counsel
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Assistant General Counsel
Stacey Tyrewala
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
(202) 644-8099– facsimile
charlie.berardesco@nerc.net
holly.hawkins@nerc.net
stacey.tyrewala@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

Exhibit A

IRO-006-WECC-2-Qualified Transfer Path Unscheduled Flow ("USF") Relief
Regional Reliability Standard and Regional Definition of "Relief Requirement" Proposed for Approval and Implementation Plan

A. Introduction

1. **Title:** Qualified Transfer Path Unscheduled Flow (USF) Relief

2. **Number:** IRO-006-WECC-2

3. **Purpose:** Mitigation of transmission overloads due to unscheduled flow on Qualified Transfer Paths.

4. **Applicability**

   4.1. Balancing Authority
   4.2 Reliability Coordinator

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

B. Requirements

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

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

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

C. Measures

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

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

D. Compliance

1. Compliance Monitoring Process:

1.1. Compliance Enforcement Authority

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

1.2. Evidence Retention:

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

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

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

1.3. Compliance Monitoring and Assessment Processes:

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

1.4. Additional Compliance Information:

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

	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Real Time Operations	Medium	Not Applicable	Not Applicable	Not Applicable	There shall be a Severe level of non-compliance if there is one instance during a calendar month in which the Reliability Coordinator approved (actively or passively) or denied a request for unscheduled flow transmission relief from the Transmission Operator of a Qualified Transfer Path, greater than five minutes after receipt of notification from the Transmission Operator of a Qualified Transfer Path.
R2	Real Time Operations	Medium	There shall be a Lower Level of non-compliance if there is less than 100% Relief Requirement provided but greater than or equal to 90% Relief Requirement provided or the Relief Requirement was less than 5 MW and was not fully provided.	There shall be a Moderate Level of non-compliance if there is less than 90% Relief Requirement provided but greater than or equal to 75% Relief Requirement provided.	There shall be a High Level of non-compliance if there is less than 75% Relief Requirement provided but greater than or equal to 60% Relief Requirement provided. .	There shall be a Severe Level of non-compliance if there is less than 60% Relief Requirement provided.

Version History

Version	Date	Action	Change Tracking
1	April 16, 2008	Permanent Replacement Standard for IRO-STD-006-0	
1	February 10, 2009	Adopted by NERC Board of Trustees	
1	March 17, 2011	FERC Order 746 issued by FERC approving IRO-006-WECC-1 (FERC approval effective on May 24, 2011)	
1	July 1, 2011	Effective Date	No change
1.1	June 25, 2012	WECC Board of Directors approves as errata. Was not approved by NERC; forwarded through the full Reliability Standards Development Procedures.	
2	February 7, 2013	Adopted by NERC Board of Trustees	

A. Introduction

1. **Title:** Qualified Transfer Path Unscheduled Flow (USF) Relief

2. **Number:** IRO-006-WECC-~~1~~2

3. **Purpose:** Mitigation of transmission overloads due to unscheduled flow on Qualified Transfer Paths.

4. **Applicability**

   4.1. Balancing ~~Authorities~~Authority

   4.2 Reliability ~~Coordinators~~Coordinator

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

B. Requirements

R1. ~~Upon receiving a request of Step 4 or greater (see Attachment 1-IRO-006-WECC-1) from the Transmission Operator of a Qualified Transfer Path, the~~ Each Reliability Coordinator shall approve ~~(actively or passively)~~ or deny ~~that~~a request within five minutes~~.~~ of receiving the request for unscheduled flow transmission relief from the Transmission Operator of a Qualified Transfer Path that will result in the calculation of a Relief Requirement. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*

R2. ~~The~~ Each Balancing ~~Authorities~~Authority shall ~~approve curtailment requests to the schedules as submitted, implement alternative actions, or a~~ perform any combination ~~there of that collectively meets~~of the following actions meeting the Relief ~~———~~Requirement~~.~~ upon receiving a request for relief as described in Requirement R1: *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*

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

C. Measures

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

~~The~~

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

D. Compliance

1. ~~1.~~ Compliance Monitoring Process:

~~1.1 Compliance Monitoring Responsibility~~

1.1. Compliance Enforcement Authority

~~1.2. Compliance Monitoring Period and Reset~~

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

~~- Reviews conducted monthly~~

~~- Spot check audits conducted anytime with 30 days notice given to prepare~~

~~- Periodic audit as scheduled by the Compliance Enforcement Authority~~

~~- Investigations~~

~~- Other methods as provided for in the Compliance Monitoring Enforcement Program~~

~~1.2.1 Compliance Monitoring Period: A Qualified Transfer Path Curtailment Event~~

~~1.2.2 The Performance reset Period is one calendar month.~~

~~1.3. Data~~

1.2. Evidence Retention:

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

- Each Balancing Authority and Reliability ~~Coordinators and Balancing Authorities~~Coordinator shall keep ~~evidence for Measure M.1 through M2~~data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.
- The Balancing Authority and Reliability Coordinator shall retain data or evidence for three calendar years ~~plus current, or since the last audit,~~ or for the duration of any Compliance Enforcement Authority investigation; whichever is longer.
- ~~1.4.~~ If a Balancing Authority or Reliability Coordinator is found non-compliant, it shall keep information related to the non-compliance until found compliant or for the duration specified above, whichever is longer.

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

1.3. Compliance Monitoring and Assessment Processes:

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

1.4. Additional Compliance Information:

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

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

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

~~**2.2. Moderate:** Not Applicable~~

~~**2.3. High:** Not Applicable~~

~~**2.4. Severe:** Not Applicable~~

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

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

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

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

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

~~**Version History – Shows Approval History and Summary of Changes in the Action Field**~~

~~Version~~	~~Date~~Time Horizon	~~Action~~VRF	~~Change Tracking~~Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Real Time Operations	Medium	Not Applicable	Not Applicable	Not Applicable	There shall be a Severe level of non-compliance if there is one instance during a calendar month in which the Reliability Coordinator approved (actively or passively) or denied a request for unscheduled flow transmission relief from the Transmission Operator of a Qualified Transfer Path, greater than five minutes after receipt of notification from the Transmission Operator of a Qualified Transfer Path.
R2	Real Time Operations	Medium	There shall be a Lower Level of non-compliance if there is less than 100% Relief Requirement provided but greater than or equal to 90% Relief Requirement provided or the Relief Requirement was less than 5 MW and was not fully provided.	There shall be a Moderate Level of non-compliance if there is less than 90% Relief Requirement provided but greater than or equal to 75% Relief Requirement provided.	There shall be a High Level of non-compliance if there is less than 75% Relief Requirement provided but greater than or equal to 60% Relief Requirement provided. .	There shall be a Severe Level of non-compliance if there is less than 60% Relief Requirement provided.

Version History

Version	Date	Action	Change Tracking
1	April 16, 2008	Permanent Replacement Standard for IRO-STD-006-0	
1	February 10, 2009	Adopted by NERC Board of Trustees	
1	March 17, 2011	FERC Order 746 issued by FERC approving IRO-006-WECC-1 (FERC approval ~~is~~ effective on May 24, 2011)	
1	July 1, 2011	Effective Date	No change
1.1	~~May 2~~June 25, 2012	~~Updated the requirements to R1. and R2. instead of R.1. and R1.2.~~ WECC Board of Directors approves as errata. Was not approved by NERC; forwarded through the full Reliability Standards Development Procedures.	
2			

Attachment 1 WECC IRO-006-WECC-1
WECC UNSCHEDULED FLOW MITIGATION
SUMMARY OF ACTIONS

Step	Action Description	Unscheduled Flow Accommodation across Path	Equivalent Percent Curtailment Required in Contributing Schedule Based on amount of Unscheduled Flow across the Qualified Transfer Path (Transfer Distribution Factor)				
			10-14%	15-19%	20-29%	30-49%	50+ %
1	Operate controllable devices in path	NA					
2	Accommodation	50 MW or 5% of maximum transfer limit					
3	Coordinated operation of Qualified Controllable Devices	50 MW or 5% of maximum transfer limit					
4	First level curtailment	50 MW or 5% of maximum transfer limit				10%	20%
5	Second level curtailment	50 MW or 5% of maximum transfer limit			10%	15%	25%
6	Accommodation	75 MW or 6% of maximum transfer limit			10%	15%	25%
7	Third level curtailment	75 MW or 6% of maximum transfer limit		10%	15%	20%	30%
8	Accommodation	100 MW or 7% of maximum transfer limit		10%	15%	20%	30%
9	Fourth level curtailment	100 MW or 7% of maximum transfer limit	10%	15%	20%	25%	35%

Proposed Regional Definition of "Relief Requirement" for inclusion in the WECC regional definitions section of the *Glossary of Terms Used in NERC Reliability Standards*

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

Exhibit B

Order No. 672 Criteria

Order No. 672 Criteria

In Order No. 672,[1] the Commission identified a number of criteria it will use to analyze Reliability Standards proposed for approval to ensure they are just, reasonable, not unduly discriminatory or preferential, and in the public interest. The discussion below identifies these factors and explains how the proposed Reliability Standard has met or exceeded the criteria. It is important to note that proposed Reliability Standard IRO-006-WECC-2 was developed from the previously approved Reliability Standard IRO-006-WECC-1 and incorporates non-substantive format and wording changes, rather than changes to the method or Requirements of the Reliability Standard.

1. Proposed Reliability Standards must be designed to achieve a specified reliability goal and must contain a technically sound means to achieve that goal.[2]

The proposed regional Reliability Standard, IRO-006-WECC-2 — Qualified Transfer Path Unscheduled Flow ("USF") Relief, was developed to provide a regional Reliability Standard that ensures mitigation of transmission overloads due to unscheduled flow on Qualified Transfer Paths.

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[1] *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, FERC Stats. & Regs. ¶ 31,204, *order on reh'g*, Order No. 672-A, FERC Stats. & Regs. ¶ 31,212 (2006).

[2] Order No. 672 at P 321. The proposed Reliability Standard must address a reliability concern that falls within the requirements of section 215 of the FPA. That is, it must provide for the reliable operation of Bulk-Power System facilities. It may not extend beyond reliable operation of such facilities or apply to other facilities. Such facilities include all those necessary for operating an interconnected electric energy transmission network, or any portion of that network, including control systems. The proposed Reliability Standard may apply to any design of planned additions or modifications of such facilities that is necessary to provide for reliable operation. It may also apply to Cybersecurity protection.

Order No. 672 at P 324. 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 ERO, in the ERO's process, the specific proposed Reliability Standard should be developed initially by persons within the electric power industry and community with a high level of technical expertise and 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.

2. Proposed Reliability Standards must be applicable only to users, owners and operators of the bulk power system, and must be clear and unambiguous as to what is required and who is required to comply.[3]

The proposed regional Reliability Standard is only applicable to Balancing Authorities and Reliability Coordinators within the WECC region. These entities are users, owners, or operators of the Bulk-Power System. The proposed regional Reliability Standard clearly identifies these applicable entities and is clear and unambiguous as to what is required to comply. Requirement R1 requires the Reliability Coordinator to approve or deny a request for unscheduled flow transmission relief from the Transmission Operator of a Qualified Transfer Path. Requirement R2 requires the Balancing Authority to provide the Relief Requirement through any combination of curtailment requests or alternative actions.

3. A proposed Reliability Standard must include clear and understandable consequences and a range of penalties (monetary and/or non-monetary) for a violation.[4]

The proposed regional Reliability Standard includes a Violation Risk Factor ("VRF") and at least one Violation Severity Level ("VSL") for each Requirement. The ranges of penalties for violations will be based on the applicable VRF and VSL and will be administered based on the sanctions table and supporting penalty determination process described in the Commission-approved NERC Sanction Guidelines.[5]

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[3] Order No. 672 at P 322. The proposed Reliability Standard may impose a requirement on any user, owner, or operator of such facilities, but not on others.

Order No. 672 at P 325. 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.

[4] Order No. 672 at P 326. The possible consequences, including range of possible penalties, for violating a proposed Reliability Standard should be clear and understandable by those who must comply.

[5] NERC Rules of Procedure Appendix 4B. Available at: http://www.nerc.com/page.php?cid=1|8|169.

WECC developed the VSLs and VRFs proposed for assignment to proposed regional Reliability Standard IRO-006-WECC-2 following applicable NERC and Commission guidance. **Exhibit E** to this filing contains the VSL and VRF guideline analysis for proposed regional Reliability Standard IRO-006-WECC-2.

Following NERC drafting conventions, the VSL's provided in regional Reliability Standard IRO-006-WECC-1 have been re-drafted into a table format with only one substantive change. The VSL for R1 has been set to "severe" because it represents a binary compliance situation.

4. A proposed Reliability Standard must identify clear and objective criterion or measure for compliance, so that it can be enforced in a consistent and non-preferential manner. [6]

Each requirement of proposed regional Reliability Standard IRO-006-WECC-2 has an associated measure of compliance that will assist those enforcing the standard in enforcing it in a consistent and non-preferential manner. The proposed measures are as follows:

> M1. The Reliability Coordinator shall have evidence that it approved or denied the request within five minutes of receiving a request for relief, in accordance with Requirement R1. Evidence may include, but is not limited to, documentation of either an active or passive approval.
>
> M2. Each Balancing Authority shall have evidence that it provided the Relief Requirement through Contributing Schedules curtailments, alternative actions, or a combination that collectively meets the Relief Requirement as directed in Requirement R.2.

Therefore, the proposed regional Reliability Standard identifies clear and objective criterion or measures for compliance as required by Order No. 672.

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[6] Order No. 672 at P 327. There should be a clear criterion or measure of whether an entity is in compliance with a proposed Reliability Standard. It should contain or be accompanied by an objective measure of compliance so that it can be enforced and so that enforcement can be applied in a consistent and non-preferential manner.

5. Proposed Reliability Standards should achieve a reliability goal effectively and efficiently — but do not necessarily have to reflect "best practices" without regard to implementation cost or historical regional infrastructure design.[7]

Proposed regional Reliability Standard IRO-006-WECC-2 achieves its reliability goal effectively and efficiently. The proposed regional Reliability Standard accomplishes the reliability goal of ensuring mitigation of transmission overloads due to unscheduled flow on Qualified Transfer Paths in the same manner as the already approved regional Reliability StandardIRO-006-WECC-1. The proposed effective date allows for a reasonable time period after approval to allow implementation of software and other minimal required changes.

6. Proposed Reliability Standards cannot be "lowest common denominator," *i.e.*, cannot reflect a compromise that does not adequately protect Bulk-Power System reliability. Proposed Reliability Standards can consider costs to implement for smaller entities, but not at consequences of less than excellence in operating system reliability.[8]

This proposed regional Reliability Standard does not reflect a "lowest common denominator" approach. The approach used in the proposed regional Reliability Standard

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[7] Order No. 672 at P 328. The proposed Reliability Standard does not necessarily have to reflect the optimal method, or "best practice," for achieving its reliability goal without regard to implementation cost or historical regional infrastructure design. It should however achieve its reliability goal effectively and efficiently.

[8] Order No. 672 at P 329. 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. Although FERC will give due weight to the technical expertise of the ERO, we will not hesitate to remand a proposed Reliability Standard if we are convinced it is not adequate to protect reliability.

Order No. 672 at P 330. 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.

is in essence the same as that used in the previously approved regional Reliability Standard.

7. 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 geographic area or regional model. It should take into account regional variations in the organization 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.[9]

The proposed regional Reliability Standard is designed on a regional basis and will only apply to the WECC region. It is not intended to be applied throughout North America. This proposed regional Reliability Standard is based on the unique topography and configuration of the Western Interconnection.

8. Proposed Reliability Standards should cause no undue negative effect on competition or restriction of the grid beyond any restriction necessary for reliability.[10]

This proposed regional Reliability Standard will not cause undue negative effects on competition or restriction of the grid. Because this proposed regional Reliability Standard will be applied equally across the WECC region, IRO-006-WECC-2 will not negatively affect competition

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[9] Order No. 672 at P 331. 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.

[10] Order No. 672 at P 332. As directed by section 215 of the FPA, FERC itself will give special attention to the effect of a proposed Reliability Standard on competition. 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.

9. The implementation time for the proposed Reliability Standard is reasonable.[11]

The implementation time for the regional Reliability Standard is based on implementation of the applicable webSAS software and at least 45 days after Regulatory approval. This time period is judged by the drafting team and the industry as being acceptable.

10. The Reliability Standard was developed in an open and fair manner and in accordance with the Commission-approved Reliability Standard development process.[12]

WECC develops regional Reliability Standards in accordance with its *Reliability Standards Development Procedures* as found in **Exhibit C** of its Regional Delegation Agreement with NERC. The development process is open to any person or entity with a legitimate interest in the reliability of the Bulk Power System. WECC considers the comments of all stakeholders and an affirmative vote of the stakeholders and the WECC Board of Directors are both required to approve a regional Reliability Standard for submission to NERC and the Commission.

The proposed regional Reliability Standard has been developed and approved by industry stakeholders using WECC's *Reliability Standards Development Procedures* and was approved by the WECC Board of Directors on January 23, 2013. The proposed regional Reliability Standard was subsequently presented to and approved by the NERC Board of Trustees February 7, 2013. Therefore, WECC has utilized its standard

[11] Order No. 672 at P 333. In considering whether a proposed Reliability Standard is just and reasonable, FERC will consider also the timetable for implementation of the new requirements, including how the proposal balances any urgency in the need to implement it against the reasonableness of the time allowed for those who must comply to develop the necessary procedures, software, facilities, staffing or other relevant capability.

[12] Order No. 672 at P 334. Further, in considering whether a proposed Reliability Standard meets the legal standard of review, we will entertain comments about whether the ERO implemented its Commission-approved Reliability Standard development process for the development of the particular proposed Reliability Standard in a proper manner, especially whether the process was open and fair. However, we caution that we will not be sympathetic to arguments by interested parties that choose, for whatever reason, not to participate in the ERO's Reliability Standard development process if it is conducted in good faith in accordance with the procedures approved by FERC.

development process in good faith and in a manner that is open and fair. No commenters disagreed with the open and fair implementation of the WECC process.

11. NERC must explain any balancing of vital public interests in the development of proposed Reliability Standards.[13]

Neither NERC nor WECC believes there are competing public interests with the request for approval of this proposed regional Reliability Standard. No comments were received that indicated the proposed regional Reliability Standard conflicts with other vital public interests. Therefore it is not necessary to balance this regional Reliability Standard against any other competing public interests.

12. Proposed Reliability Standards must consider any other appropriate factors.[14]

All comments and concerns were addressed using the WECC *Reliability Standards Development Procedures* which is consensus-based, technically sound, and open to the public and bordering entities that may be impacted by a regional Reliability Standard. No other factors were identified as necessary for consideration by the standard drafting team in the development of the proposed regional Reliability Standard.

Additional Criteria for Regional Reliability Standards

Order No. 672 also establishes additional criteria that a regional Reliability Standard must satisfy: "A regional difference from a continent-wide Reliability Standard must either be (1) more stringent than the continent-wide Reliability Standard including a regional difference that addresses matters the continent-wide Reliability Standard does

[13] Order No. 672 at P 335. Finally, we understand that at times development of a proposed Reliability Standard may require that a particular reliability goal must be balanced against other vital public interests, such as environmental, social and other goals. We expect the ERO to explain any such balancing in its application for approval of a proposed Reliability Standard.

[14] Order No. 672 at P 323. In considering whether a proposed Reliability Standard is just and reasonable, we will consider the following general factors, as well as other factors that are appropriate for the particular Reliability Standard proposed.

not, or (2) a Regional Reliability Standard that is necessitated by a physical difference in the Bulk-Power System."[15]

The NERC continent-wide Reliability Standard IRO-006-4 requires a Reliability Coordinator experiencing a potential or actual System Operating Limit ("SOL") or Interconnection Reliability Operating Limit ("IROL") violation to take appropriate actions to relieve transmission loading using local or Interconnection-wide procedures (Requirement R1). However, the proposed regional Reliability Standard goes beyond the NERC requirements by establishing a process to reduce schedules that prevent potential overloads during the next operating hour. Furthermore, proposed regional Reliability Standard IRO-006-WECC-2 Requirement R1 requires each Reliability Coordinator to approve or deny a request submitted by a Transmission Operator of a Qualified Transfer Path within five minutes. Requirement R2 requires each Balancing Authority to approve the curtailment requests to the schedules as submitted, implement alternative actions, or a combination thereof, that collectively meet the Relief Requirement. Consistent with the Commission's approval of regional Reliability Standard IRO-006-WECC-1, the proposed regional Reliability Standard, IRO-006-WECC-2 is more stringent than the continent-wide Reliability Standard.

[15] Order No. 672 at P 291.

Exhibit C

Complete Development Record

Regional Reliability Standards - Under Development				
Standard No.	Title	Regional Status	Dates	NERC Status
IRO-006-WECC-02	Qualified Transfer Path Unscheduled Flow (USF) Relief	Standard Under Development	10/03/12 - 11/16/12	Info 1 Submit Comments Comment Form 2 IRO-006-WECC-2 (Clean) 3 IRO-006-WECC-2 (redlined to last approved) 4 Comments Received 5 Consideration of Comments 6

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Regional Reliability Standards Announcement

Comment Period Open for IRO-006-WECC-2

October 3 – November 16, 2012

Regional Project: Now Available

Proposed Standard for the Western Electricity Coordinating Council (WECC)

WECC has requested NERC to post regional reliability standard **IRO-006-WECC-2 – Qualified Transfer Path Unscheduled Flow (USF) Relief,** for a 45-day industry review as permitted by the NERC Rules of Procedure. The comment period is open through **8 p.m. Eastern on Friday, November 16, 2012.**

Instructions

Please use this electronic form to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at monica.benson@nerc.net. An off-line, unofficial copy of the comment form is posted on the regional reliability standards under development page:

Background

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

Standards Process

The Standard Processes Manual contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance, please contact Monica Benson, Standards Process Administrator, at monica.benson@nerc.net or at 404-446-2560.

North American Electric Reliability Corporation
3353 Peachtree Rd.NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Unofficial Comment Form for Regional Reliability Standard IRO-006-WECC-2 Qualified Transfer Path Unscheduled Flow (USF) Relief

Please **DO NOT** use this form. Please use the electronic form located at the link below to submit comments on the Regional Reliability Standard **IRO-006-WECC-2 –Qualified Transfer Path Unscheduled Flow (USF) Relief** comments must be submitted by **8 p.m. Eastern on November 16, 2012.** If you have questions please contact Howard Gugel at howard.gugel@nerc.net or Barb Nutter at barbara.nutter@nerc.net.

Regional Reliability Standards Under Development Page

Background Information

A regional reliability standard shall be: (1) a regional reliability standard that is more stringent than the continent-wide reliability standard, including a regional standard that addresses matters that the continent-wide reliability standard does not; or (2) a regional reliability standard that is necessitated by a physical difference in the bulk power system. Regional reliability standards shall provide for as much uniformity as possible with reliability standards across the interconnected bulk power system of the North American continent. Regional reliability standards, when approved by FERC and applicable authorities in Mexico and Canada shall be made part of the body of NERC reliability standards and shall be enforced upon all applicable bulk power system owners, operators, and users within the applicable area, regardless of membership in the region.

IRO-006-WECC-1 is being revised to align IRO-006-WECC-2 with the changes made to the WECC Unscheduled Flow Reduction Guideline (UFRG), VSLs were modified to eliminate ambiguity and to modify the currently approved term “Relief Requirement”.

Each **Western Electricity Coordinating Council (WECC)** Regional Reliability Standard shall enable or support one or more of the NERC reliability principles, thereby ensuring that each standard serves a purpose in support of the reliability of the regional bulk electric system. Each of those standards shall also be consistent with all of the NERC reliability principles, thereby ensuring that no standard undermines reliability through an unintended consequence. The NERC reliability principles supported by this standard are the following:

- **Reliability Principle 1 -** 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.

- **Reliability Principle 3 -** Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.

The proposed SPP Regional Reliability Standard is not inconsistent with, or less stringent than established NERC Reliability Standards. Once approved by the appropriate authorities, the SPP Regional Reliability Standard obligates WECC to monitor and enforce compliance, apply sanctions, if any, consistent with any regional agreements and the NERC rules.

> **R1.** Each Reliability Coordinator shall approve or deny a request within five minutes of receiving the request for unscheduled flow transmission relief from the Transmission Operator of a Qualified Transfer Path that will result in the calculation of a Relief Requirement.

> **R2.** Each Balancing Authority shall perform any combination of the following actions meeting the Relief Requirement upon receiving a request for relief as described in Requirement R1.

The approval process for a regional reliability standard requires NERC to publicly notice and request comment on the proposed standard. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

> **Unfair or Closed Process —** The regional reliability standard was not developed in a fair and open process that provided an opportunity for all interested parties to participate. Although a NERC-approved regional reliability standards development procedure shall be presumed to be fair and open, objections could be raised regarding the implementation of the procedure.
>
> **Adverse Reliability or Commercial Impact on Other Interconnections —** The regional reliability standard would have a significant adverse impact on reliability or commerce in other interconnections.
>
> **Deficient Standard —** The regional reliability standard fails to provide a level of reliability of the bulk power system such that the regional reliability standard would be likely to cause a serious and substantial threat to public health, safety, welfare, or national security.
>
> **Adverse Impact on Competitive Markets within the Interconnection —** The regional reliability standard would create a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability.

1. **Do you agree the proposed standard is being developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?**

   ☐ Yes

   ☐ No

   Comments:

2. **Does the proposed standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?**

   ☐ Yes
   ☐ No

   Comments:

3. **Does the proposed standard pose a serious and substantial threat to public health, safety, welfare, or national security?**

   ☐ Yes
   ☐ No

   Comments:

4. **Does the proposed standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?**

   ☐ Yes
   ☐ No

   Comments:

5. **Does the proposed regional reliability standard meet at least one of the following criteria?**

   - **The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard**
   - **The proposed standard has requirements that are not included in the corresponding continent-wide reliability standard**
   - **The proposed regional difference is necessitated by a physical difference in the bulk power system**

   ☐ Yes
   ☐ No

   Comments:

- ## Standard Development Timeline

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

- **Description of Current Draft**

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

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

Proposed Changes

The draft standard proposes the following changes:

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

Implementation Plan

In light of the Proposed Changes listed above, it is the drafting team's view that the Proposed Changes are largely clarifying in nature and will not require changes to current practices in order to implement the document.

Project Roadmap

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

Anticipated Actions	Anticipated Date
Standards Authorization Request (SAR)	April 30, 2012
WECC Standards Committee (WSC) approves SAR	May 1, 2012
WSC assigns drafting team	May 1, 2012
WECC concludes SAR changes are errata	May 8, 2012
WSC concurs SAR changes are errata	May 21, 2012
WECC Board of Directors approves changes as errata	June 25, 2012
NERC Legal informed WECC changes are not errata; mandates development via Reliability Standards Development Procedures (Procedures).	July 16, 2012
Two week notice for first drafting team meeting	July 23, 2012
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WSC meets to approve posting	August 8, 2012
WECC Posting for 45-day comment – opened	August 9, 2012
WECC Posting for 45-day comment – closed	September 24, 2012
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NERC opens 45 day comment period	October 3, 3012
Ballot Pool Opens	October 23, 2012
Notice of Joint Session	October 31, 2012
Joint Session (Target: 1000 – 1200 Mountain)	November 20, 2012
Ballot Pool closes	November 22, 2012
NERC closes 45 day comment period	November 19, 2012
Ballot opens (at least 7 days after Joint Session)	November 27, 2012

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

Version History

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

Definitions of Terms Used in the Standard

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

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

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

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

A. Introduction

1. **Title:** Qualified Transfer Path Unscheduled Flow (USF) Relief

2. **Number:** IRO-006-WECC-2

3. **Purpose:** Mitigation of transmission overloads due to unscheduled flow on Qualified Transfer Paths.

4. **Applicability**

   4.1. Balancing Authority
   4.2 Reliability Coordinator

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

B. Requirements

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

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

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

C. Measures

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

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

D. Compliance

1. Compliance Monitoring Process:

1.1. Compliance Enforcement Authority

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

1.2. Evidence Retention:

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

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

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

1.3. Compliance Monitoring and Assessment Processes:

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

1.4. Additional Compliance Information:

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

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

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

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

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

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A. Introduction

1. **Title:** Qualified Transfer Path Unscheduled Flow (USF) Relief

2. **Number:** IRO-006-WECC-2

3. **Purpose:** Mitigation of transmission overloads due to unscheduled flow on Qualified Transfer Paths.

4. **Applicability**

   4.1. Balancing Authority

   4.2 Reliability Coordinator

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

B. Requirements

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

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

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

C. Measures

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

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

D. Compliance

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1. Compliance Monitoring Process:

1.1. Compliance Enforcement Authority

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

1.2. Evidence Retention:

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

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

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

1.3. Compliance Monitoring and Assessment Processes:

- Compliance Audit
- Self-Certification
- Spot Checking
- Compliance Investigation
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1.1 Compliance Monitoring Responsibility¶
¶

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1.2. Compliance Monitoring Period and Reset¶
¶

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- Spot check audits conducted anytime with 30 days notice given to prepare¶

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1.4. Additional Compliance Information:

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

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

¶

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

2.2. Moderate: Not Applicable¶

2.3. High: Not Applicable¶

2.4. Severe: Not Applicable¶

¶

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

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

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

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

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

¶

¶

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

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

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

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Organization (2 Responses)
Group Name (3 Responses)
Lead Contact (3 Responses)
Contact Organization (3 Responses)
Question 1 (5 Responses)
Question 1 Comments (5 Responses)
Question 2 (5 Responses)
Question 2 Comments (5 Responses)
Question 3 (5 Responses)
Question 3 Comments (5 Responses)
Question 4 (5 Responses)
Question 4 Comments (5 Responses)
Question 5 (5 Responses)
Question 5 Comments (5 Responses)

Individual
Mike Burleson
Arizona Public Service
Yes
No
No
No
Yes
Group
pacificorp
ryan millard
pacificorp
Yes
No
No
No
Yes
Individual
Janelle Marriott-Gill
Tri-State Generation and Transmission Assn., Inc.
Yes
No
No

No
Tri-State has been a strong advocate for bringing WECC's curtailment practices in line with the curtailment priorities of FERC's pro forma OATT. As explained in its complaint at FERC in Docket Nos. EL13-11-000 and RD13-1-000, WECC's current curtailment practices are not consistent with the curtailment priorities of FERC's pro forma OATT. While Tri-State does not object to the substance of the requirements of this standard, which Tri-State views are largely clarifying, Tri-State does object to the Effective Date provision to the extent it authorizes WECC staff to delay implementation of a resolution of the inconsistency until "complete implementation of applicable webSAS changes and FERC approval of this standard and the revised Unscheduled Flow Mitigation Plan Documents." As drafted in IRO-006-WECC-2, the requirements are indifferent to the methodology or tools to be used to mitigate unscheduled flow. Upon FERC approval, this standard has no bearing or impact to either the current or future WECC relief methodologies. Tacking on language to hold the effective date of IRO-006-WECC-2 until software is developed, and until the separate FERC docket approval process is complete for "plan" documents is not derived from the language in the standard, is not necessary, provides a loophole for the potential delay of implementation of IRO-006-WECC-2, and thus potential delay of resolution of FERC pro forma OATT priorities indefinitely. Accordingly, Tri-State believes the Effective Date provision in the revised standard would "pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability." Tri-State proposes the following Effective Date language: "On the latter of the first day of the first quarter at least 45 days after Regulatory approval." Thank you.
Yes
Group
Bonneville Power Administration
Chris Higgins
Transmission Reliability Program
Yes
No
No
No
Yes
Group
Arizona Public Service Company
Janet Smith, Regulatory Affairs Supervisor
Arizona Public Service Company
Yes
No
No
No
Yes

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments

Regional Reliability Standard IRO-006-WECC-2

The Regional Reliability Standard IRO-006-WECC-2 Drafting Team thanks all commenters who submitted comments on the Regional Reliability Standard IRO-006-WECC-2 standard. This standard was posted for a 45-day public comment period from October 3 through November 16, 2012. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were five sets of comments, including comments from approximately eight different people from approximately four companies representing four of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's project page.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or via e-mail at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.[1]

[1] The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Index to Questions, Comments, and Responses

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
3 — Load-serving Entities
4 — Transmission-dependent Utilities
5 — Electric Generators
6 — Electricity Brokers, Aggregators, and Marketers
7 — Large Electricity End Users
8 — Small Electricity End Users
9 — Federal, State, Provincial Regulatory or other Government Entities
10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter											
						3	4	5	6	7	8	9	10
1.	Group	Chris Higgins	Bonneville Power Administration	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Joel Jenck	Power Scheduling Realtime	WECC	3
2.	Robin Chung	Real-Time Scheduling	WECC	1
3.	Wesley Hutchison	Trans Commercial System Mgmt	WECC	1

2.	Individual	Ryan Millard	Pacificorp	X		X		X	X				
3.	Individual	Janet Smith, Regulatory Affairs Supervisor	Arizona Public Service Company	X		X		X	X				
4.	Individual	Mike Burleson	Arizona Public Service	X		X		X					
5.	Individual	Janelle Marriott-Gill	Tri-State Generation and Transmission Assn., Inc.	X		X		X	X				

1. Do you agree the proposed standard is being developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?

Summary Consideration: The drafting team would like to thank each entity that participated in the development process.

Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	Yes	
Pacificorp	Yes	
Arizona Public Service Company	Yes	
Arizona Public Service	Yes	
Tri-State Generation and Transmission Assn., Inc.	Yes	

2. Does the proposed standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

Summary Consideration: The drafting team would like to thank each entity that participated in the development process.

Organization	Yes or No	Question 2 Comment
Bonneville Power Administration	No	
Pacificorp	No	
Arizona Public Service Company	No	
Arizona Public Service	No	
Tri-State Generation and Transmission Assn., Inc.	No	

3. Does the proposed standard pose a serious and substantial threat to public health, safety, welfare, or national security?

Summary Consideration: The drafting team would like to thank each entity that participated in the development process.

Organization	Yes or No	Question 3 Comment
Bonneville Power Administration	No	
Pacificorp	No	
Arizona Public Service Company	No	
Arizona Public Service	No	
Tri-State Generation and Transmission Assn., Inc.	No	

4. Does the proposed standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?

Summary Consideration:

The drafting team would like to thank each entity that participated in the development process. The drafting team considered the alternatives of keeping the proposed Effective Date or changing it as requested. The drafting team concluded that the net effect is the same under either approach and has opted not to make the requested changes.

Organization	Yes or No	Question 4 Comment
Bonneville Power Administration	No	
Pacificorp	No	
Arizona Public Service Company	No	
Arizona Public Service	No	
Tri-State Generation and Transmission Assn., Inc.	No	Tri-State has been a strong advocate for bringing WECC's curtailment practices in line with the curtailment priorities of FERC's pro forma OATT. As explained in its complaint at FERC in Docket Nos. EL13-11-000 and RD13-1-000, WECC's current curtailment practices are not consistent with the curtailment priorities of FERC's pro forma OATT. While Tri-State does not object to the substance of the requirements of this standard, which Tri-State views are largely clarifying, Tri-State does object to the Effective Date provision to the extent it authorizes WECC staff to delay implementation of a resolution of the inconsistency until "complete implementation of applicable webSAS changes and FERC approval of this standard and the revised Unscheduled Flow Mitigation Plan Documents." As drafted in IRO-006-WECC-2, the

Organization	Yes or No	Question 4 Comment
		requirements are indifferent to the methodology or tools to be used to mitigate unscheduled flow. Upon FERC approval, this standard has no bearing or impact to either the current or future WECC relief methodologies. Tacking on language to hold the effective date of IRO-006-WECC-2 until software is developed, and until the separate FERC docket approval process is complete for "plan" documents is not derived from the language in the standard, is not necessary, provides a loophole for the potential delay of implementation of IRO-006-WECC-2, and thus potential delay of resolution of FERC pro forma OATT priorities indefinitely. Accordingly, Tri-State believes the Effective Date provision in the revised standard would "pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability." Tri-State proposes the following Effective Date language: "On the latter of the first day of the first quarter at least 45 days after Regulatory approval."Thank you.
Response: The drafting team has examined both alternatives finding no net effect in either keeping the language as suggested or making the requested change. Implementing the standard without the underlying Guideline and software changes will not facilitate the Commenter's desired changes to the curtailment methodology.		

5. Does the proposed regional reliability standard meet at least one of the following criteria?

- **The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard**
- **The proposed standard has requirements that are not included in the corresponding continent-wide reliability standard**
- **The proposed regional difference is necessitated by a physical difference in the bulk power system**

Summary Consideration: The drafting team would like to thank each entity that participated in the development process.

Organization	Yes or No	Question 5 Comment
Bonneville Power Administration	Yes	
Pacificorp	Yes	
Arizona Public Service Company	Yes	
Arizona Public Service	Yes	
Tri-State Generation and Transmission Assn., Inc.	Yes	

END OF REPORT

Exhibit D

Standard Drafting Team Roster

Team Member Biographies
IRO-006-WECC-2
Qualified Transfer Path Unscheduled Flow (USF) Relief
Attachment J

Below please find a biographical snapshot for the members of the WECC-0095, Qualified Transfer Path Unscheduled Flow (USF) Relief Regional Reliability Standard Drafting Team.

Name	Biography
David Lemmons	Mr. David Lemmons began his career in the electric industry with Southwestern Public Service Company (SPS) in Amarillo, Texas, in 1989. He spent eight years in the rates and regulation department where he performed rate of return analyses, designed rates and worked with other regulatory issues. In 1997, Mr. Lemmons transferred to the energy trading department during the merger between SPS and Public Service Company of Colorado (PSCo). In this capacity, with Xcel Energy and its predecessor, New Century Energies, he analyzed the electric system loads and resources for day-ahead and real-time operations and trading — working with generation and fuel procurement to ensure resources were ready and available to serve loads. In his current position as senior manager of market operations, Mr. Lemmons represents Xcel Energy at electric reliability, RTO development and system operation meetings throughout the United States, as well as providing support for state and Federal regulatory proceedings. Mr. Lemmons chairs the WECC-0083 BAL-002-WECC-2 Standard Drafting Team, the NERC Project 2007-12 Standard Drafting team and is a team member on the NERC Project 2010-14.1 Standard Drafting Team. He holds a Master of Science degree in finance and economics from West Texas A&M University.
Ken Otto	Mr. Ken Otto began his Federal career as a student engineer with Bonneville Power Administration in 1980, before joining Western Area Power Administration as a system protection engineer in 1983. Many of the policies and procedures he implemented during his tenure as the lead electrical engineer in Montrose's CMDO became standard Western policy. These include substation computerized controls, an electronic relay replacement program and collaboration with the Supervisory

	Controls and Data Acquisition Division to develop SCADA standards. Mr. Otto was involved with the installation and commissioning of phase shifting transformers on the TOT2A Project, and the Kayenta Series Capacitor Project. When he accepted his current position in the Colorado River Storage Project Management Center's EMMO in October 2000, Mr. Otto took charge over the office's real-time merchant activities. Mr. Otto was instrumental in successfully integrating the Loveland Area Projects and Basin Electric merchant activities into the EMMO. Mr. Otto has also developed software tools and procedures for scheduling and marketing Western's resources. Mr. Otto is now the Supervisory Energy Management and Marketing specialist at Western's Energy Management and Marketing Office, in Montrose, Colo. Mr. Otto serves on the WECC Operating Committee, and both the Seams Issues Subcommittee and Market Issues Subcommittee as well as various other subcommittees, task forces and drafting teams. Mr. Otto also represents Western on the WSPP Executive Committee and Operating Committee. Mr. Otto received his degree in electrical engineering from the University of New Mexico and is a registered professional engineer.
David Lunceford	Inactive – Medical Leave
Janelle Marriott-Gill	Ms. Janelle Marriott-Gill has 32 years extensive electric utility industry experience comprised of 16 years with Xcel Energy, (Public Service Company of Colorado), and 16 years with Tri-State Generation and Transmission Assn., Inc. Her background represents a variety of experience including 28 yrs industry regulations, standards, compliance, and operating, tariff, funding and accounting requirements, with particular experience in internal, external and regulatory audits both in investor-owned and cooperative environments. She spent 20 yrs working with the engineering, construction, operation, and maintenance of wholly-owned and joint participant transmission and generating facilities, control area operations, reserves, transmission tariffs, and safety procedures. Intermixed are 18 yrs in the design, development, implementation, and training of computer software systems for energy scheduling, OASIS, reserve sharing groups, unscheduled flow management, compliance programs, corporate budgeting and financials, statistical analysis, and work management systems. Currently she provides training, regulatory, and compliance coordination for real time system operations to serve the loads of 44 member cooperatives within a geographical territory spanning 200,000 square miles, 6 states, 8 interconnected balancing areas, 3 time

	zones, 2 reserve sharing groups. Janelle attends the WECC UFAS, and USFTF, and carries Tri-State's NERC vote for the LSE function, and Tri-State's WECC vote for both the Marketers and Brokers, and Distribution segments. As Training Coordinator Janelle is a NERC CEH provider and member of the WECC Human Performance Improvement Workgroup.

Exhibit E

Violation Severity Level and Violation Risk Factor Analysis

VRF and VSL Justification
IRO-006-WECC-2
Qualified Transfer Path Unscheduled Flow (USF) Relief
Attachment G

Table of Compliance Elements

See Attachment A to this document.

As part of this filing, the VRFs and the VSLs are being updated and reformatted into table format.

Violation Risk Factor (VRF)

The WECC-0095 - IRO-006-WECC-2 Drafting Team used the definitions for VRFs[1] to determine the VRF for each requirement. Based upon the definitions, the drafting team assigned a "Medium" VRF for Requirement R1 and Requirement R2 because, if either Requirement were violated, it "could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system" but would not likely "lead to bulk electric system instability, separation, or cascading failures."

Violation Severity Level (VSL)

The VSL for Requirement R1 is set at "Severe" in accordance with the NERC VSL Guidelines (Guidelines).[2] Requirement R1 requires that each Reliability Coordinator take action within five minutes of receiving a request for unscheduled flow transmission relief. The described task is binary in nature without leeway for partial performance. Thus, per the Guidelines, at Guideline 2, "using a 'Severe' VSL is an acceptable approach."

The VSL for Requirement R2: 1) is structured in the preferred four-part Lower-to-Severe style, 2) is based on a specific occurrence as opposed to a cumulative number of violations, 3) does not decrease as compared to the previous filing, and 4) describes an increasing degree of non-performance as occurring in percentage increments. For example, a Lower VSL in Requirement R2 occurs when there is "less than 100% Relief Requirement provided but greater than or equal to 90% Relief Requirement provided or the Relief Requirement was less than 5 MW and was not fully provided." As the degree of non-compliance increases, so does the VSL.

(Please see Attachment A for details.)

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[1] http://www.nerc.com/files/Violation_Risk_Factors.pdf

[2] http://www.nerc.com/files/VSL_Guidelines_20090817.pdf

Attachment A
Table of Compliance Elements

	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Real Time Operations	Medium	Not Applicable	Not Applicable	Not Applicable	There shall be a Severe level of non-compliance if there is one instance during a calendar month in which the Reliability Coordinator approved (actively or passively) or denied a request for unscheduled flow transmission relief from the Transmission Operator of a Qualified Transfer Path, greater than five minutes after receipt of notification from the Transmission Operator of a Qualified Transfer Path.
R2	Real Time Operations	Medium	There shall be a Lower Level of non-compliance if there is less than 100% Relief Requirement provided but greater than or equal to 90% Relief Requirement provided or the Relief Requirement was less than 5 MW and was not fully provided.	There shall be a Moderate Level of non-compliance if there is less than 90% Relief Requirement provided but greater than or equal to 75% Relief Requirement provided.	There shall be a High Level of non-compliance if there is less than 75% Relief Requirement provided but greater than or equal to 60% Relief Requirement provided. .	There shall be a Severe Level of non-compliance if there is less than 60% Relief Requirement provided.