

Implementation Plan

Standards Authorization Request (SAR)

The original SAR is located [here](#).

Documentation templates will be updated for final filing.

Approvals Required

- WECC Ballot Body Pending
- WECC Board of Directors Pending
- NERC Board of Trustees Pending
- FERC Pending

Effective Date

The proposed effective is the “First day of the second quarter following regulatory approval.” Because changes to FAC-501-WECC-2 Transmission Maintenance may impact other NERC Standards, the drafting team recommends NERC review the following documents, consider whether remediation is required, and if so, coordinate an effective date with all impacted documents.

Other NERC documents potentially impacted by changes to FAC-501-WECC-2 include the following:

- 1) FAC-003-4, Transmission Vegetation Management
- 2) PRC-023-4, Transmission Relay Loadability, Attachment B
- 3) NERC Glossary of Terms Used in Reliability Standards (Glossary)

For more information, please see Other Standards Impacted and [Attachment 1A WECC-0141 Posting 1](#) presented as part of this filing.

Justification of Effective Date

Attachment B

This project proposes removal of four paths from FAC-501-WECC-2, Transmission Maintenance, Attachment B, WECC Major Transfer Paths (Attachment B). The project also proposes creation of Attachment C, Revision Process, whereby paths could be added to and removed from Attachment B. If

approved, Attachment C would be used for adding and/or removing Path Names from Attachment B in lieu of using the WECC Reliability Standards Development Procedures (Procedures).

This project proposes removal of Paths 22, 50, 51, and 73 from Attachment B. Removal of the four paths was fully vetted and approved using the Procedures, augmented by Arizona Public Service's (APS) and the Bonneville Power Administration's (BPA) direct coordination of this effort with WECC staff, impacted Transmission Owners/Operators, and the engineering and operating committees representing the impacted Transmission Owners.¹ The reliability impacts of removing the four paths have been fully vetted and approved at the aforementioned stages and will also be presented to a WECC Ballot Pool and the WECC Board of Directors with a request for approval.

Implementation of the requested effective date will have no negative impact on reliability within the Western Interconnection; however, a coordinated effective date with other NERC documents should be considered by NERC. See Impacts on Other Standards.

Attachment C

This project proposes inclusion of Attachment C, Revision Process as a supporting document to address changes to Attachment B in lieu of the Procedures. This approach was approved/suggested by FERC when Version 1 of the project was approved.

Creation of Attachment C is an essential step in this standard's evolution as the content of Attachment B was created *circa 1997*, has been virtually unchanged since its inception, and there exists no record describing *why* the listed Path Names were originally included nor by what criteria future paths should be added or existing Path Names removed.² Proposed Attachment C addresses each of these concerns by acknowledging the unknown background of each path's inclusion while providing a forward-looking means for due process review to add or remove paths from Attachment B.

Because proposed Attachment C mandates both due process plus reliability review, approval of the effective date creates neither undue surprise nor negative impact to reliability within the Western

¹ To further ensure due process, APS/BPA posted their intentions on the APS/BPA Open Access Same-time Information System (OATI) announcing the proposed removal of the paths from the WECC Path Rating Catalog. The catalog owner approved APS's request to remove Paths 22, 50, and 51 with an effective date of January 1, 2020. BPA's request to remove Path 73 was approved for May 12, 2021.

² "As used herein, Path Name is used as a proper noun referring to the as-approved FAC-501-WECC-2, Attachment B, column heading "Path Name." Path Name is not included in the NERC Glossary of Terms Used in Reliability Standards. Although the reliability reasons for inclusion in Attachment B could not be found, WECC's Reliability Management System Criteria Agreement, Annex A provides some evidence as to why the paths were included. At Annex A, the Definitions section indicates that the paths included in Table 2 (later known as Attachment B) are "those transfer paths monitored by the WECC regional Reliability Coordinators." The earliest versions use the term "Security Coordinator" as opposed to Reliability Coordinator.

Interconnection. However, a coordinated review of the other identified NERC documents should be undertaken by NERC before an effective date is established.

Impact on Other Standards

The title of FAC-501-WECC-2, Attachment B is “Major WECC Transfer Path in the Bulk Electric System by WECC.” The title is a holdover from Version Zero documents.³ This precise capitalized term is used in the Applicability section of FAC-003-4, Vegetation Management without further reference or definition. A lowercase similar phrase “major transfer path within the Western Interconnection” is used in Section B. Criteria of PRC-023-4, Transmission Relay Loadability and also in the definition of the Bulk Electric System (BES) contained in the NERC Glossary.

If FAC-003-4 is referencing the content (Path Names) of FAC-501-WECC-2, Attachment B, any changes made to Attachment B will self-execute in FAC-003-4 creating due process and implementation concerns for FAC-003-4. Because changes to FAC-003-4 are outside of the scope of this project, the drafting team encourages NERC to review that standard and make changes if deemed necessary. To the extent a change to either FAC-501-WECC-2 or FAC-003-4 impacts the opposite standard, NERC should consider remediation and a coordinated effective date of all impacted documents.

If PRC-023-4 is referencing or relying on FAC-501-WECC-2, Attachment B to determine applicability, NERC should review PRC-023-4 and consider remedial changes. If changes are made, NERC should consider coordinating the effective date of all impacted documents.

If the NERC Glossary definition of the BES relies on FAC-501-WECC-2, Attachment B for detail, the glossary should be revisited with a coordinated effective date in mind.

The drafting team does not definitely conclude that these documents are intertwined. Rather, the drafting team provides the concern to NERC for consideration and treatment – if deemed necessary – per the NERC Rules of Procedure and associated standards development processes.

Potential Remedy

If a NERC review determines that FAC-003-4 relies on FAC-501-WECC-2, Attachment B to determine how FAC-003-4 is implemented, the remedy may be as simple as importation of Attachment B content from FAC-501-WECC-2, Attachment B into FAC-003-4 as an attachment. Because FAC-501-WECC-3 proposes to change the title of Attachment B, FAC-003-4 could retain the existing reference without

³ Version Zero documents refer to those standards first accepted as NERC Reliability Standards (Docket No. RR07-11-000, July 2007; see also Docket No. RM09-9-000, December 2010). For purposes of this project, standard’s nomenclature from 2007 to date is sequentially PRC-STD-005-1, FAC-501-WECC-1, and FAC-501-WECC-2, all of which have the same name – Transmission Maintenance.



upsetting the Applicability verbiage. Because the referenced content is being imported (relocated) and not changed, the importation may be seen by NERC as an errata per its Rules of Procedure.⁴

As to the PRC-023-4 and the NERC Glossary there is a much more tenuous connection due to the lowercase case and the similar but not precise verbiage. Because of this tenuous connection, the drafting team suggests that there is no immediate need to make changes to those two documents. As such, NERC could consider delaying review of the matter for PRC-023-4 and the NERC Glossary until the normally scheduled review.

Consideration of Early Compliance

As to FAC-501-WECC-3, the drafting team sees no concerns with early compliance within the Western Interconnection. However, if NERC concludes that documents outside of the scope of this project require remediation, the drafting team encourages NERC to coordinate the effective dates of those impacted documents.

⁴ Because the proposed remedy would “not change the scope or intent of” FAC-003-4, and would have “no material impact on the end users of the Reliability Standard” implementation of a title change and/or importation of content may be covered by the errata authority offered to the NERC Standards Committee per NERC Rules of Procedure, Section 12.0: Process for Correcting Errata.

