

## **WECC Standard IRO-STD-006-0 - Qualified Path Unscheduled Flow Relief**

### **A. Introduction**

- 1. Title:** Qualified Path Unscheduled Flow Relief
- 2. Number:** IRO-STD-006-0
- 3. Purpose:** Mitigation of transmission overloads due to unscheduled line flow on Qualified Paths.

#### **4. Applicability**

4.1. This criterion applies to Transmission Operators, Balancing Authorities and Load Serving Entities within the Western Interconnection.

- 5. Effective Date:** This Western Electricity Coordinating Council Regional Reliability Standard will be effective when approved by the Federal Energy Regulatory Commission under Section 215 of the Federal Power Act. This Regional Reliability Standard shall be in effect for one year from the date of Commission approval or until a North American Standard or a revised Western Electricity Coordinating Council Regional Reliability Standard goes into place, whichever occurs first. At no time shall this regional Standard be enforced in addition to a similar North American Standard.

### **B. Requirements**

#### **WR1.**

#### **Curtailment of Contributing Schedules**

WECC's Unscheduled Flow Mitigation Plan (Plan), which is on file with FERC and has been accepted by FERC (most recently prior to the date hereof on November 20, 2001 in Docket No. ERO1-3085-000), 1/ specifies that members 2/ shall comply with requests from (Qualified) Transfer Path Operators to take actions that will reduce unscheduled flow on the Qualified Path in accordance with the table entitled "WECC Unscheduled Flow Procedure Summary of Curtailment Actions," which is located in Attachment 1 of the Plan.

#### **Plan Section 11:**

11.1 When USF Accommodation, as specified in Section 7, together with coordinated operation of the Qualified Controllable Devices, as specified in Section 9, are insufficient to reduce the Actual Flow on the Qualified Transfer Path to below the Transfer Limit, the Transfer Path Operator shall request curtailments in Schedules that contribute to the USF through the Qualified Transfer Path according to the USF Reduction Procedure.

11.2 Responsible Entities shall comply in a timely manner with a Transfer Path Operator's request for Schedule Curtailments.

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1/ Capitalized terms used in this section, unless separately defined in this standard, shall have the meaning specified in the Plan.

2/ Reliability Standard will apply to all Responsible Entities within the Western Interconnection.

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### **Plan Attachment 1 Section 9:**

"h. Upon receipt of a curtailment request, Contributing Schedules which are subject to curtailments will be reduced (or equivalent alternative schedule adjustments will be effected) in accordance with the following procedures:

- i. Receivers of Contributing Schedules will initiate the requested schedule reductions unless an otherwise agreed upon procedure for schedule reduction achieving the equivalent effect on the Qualified Transfer Path is established by the Receiver and/or the Sender.
- ii. Responsible Entities may arrange among themselves to make curtailments called for by this USF Reduction Procedure in a manner other than prescribed provided that the arrangements are as effective as the identified schedule curtailment in reducing USF across the Qualified Transfer Path. Responsible Entities may make bilateral arrangements, which will enable a Responsible Entity with schedules on the affected Qualified Transfer Path to make the required curtailments in lieu of making larger curtailments in schedules over other parallel paths. Where alternative schedule adjustments are utilized, it is the Receiver's responsibility to cause schedule adjustments to be effected which provide the same reduction in flow across the Qualified Transfer Path as would have been achieved by the prescribed reduction in the Contributing Schedule.
- iii. The total amount of requested schedule reduction may be apportioned to the applicable schedules at the discretion of the Receiver subject to item iv below.
- iv. Irrespective of the schedules altered or the manner in which they are altered, each Responsible Entity's overall net reduction in Actual Flow across the constrained Qualified Transfer Path must be equivalent to or greater than the reduction which would have been achieved had the identified schedule reduction occurred as requested.
- v. System dispatchers or real-time schedulers should identify in advance those schedules that qualify for curtailment requests for all Qualified Transfer Paths. This will expedite implementation of this USF Reduction Procedure when requested.
- vi. While this USF Reduction Procedure does not expect receivers to curtail schedules which would result in loss of firm load, nothing in this USF Reduction Procedure shall relieve the receiver of the obligation to achieve the required reduction in USF across the constrained Qualified Transfer Path."

Contributing Schedule curtailments apply to schedules in place before initiation of the USF Procedure at Step 4 (First level Contributing Schedule Curtailment) or higher step. At the time a Step 4 Level 1 USF Action or higher step is initiated, Schedules are established by the existence of an "Implemented" NERC Transaction Tag.

### **Restricted Transactions**

After the USF Event is declared, a transaction with greater than a 5% Transfer Distribution Factor (TDF) on the Qualified Path in the qualified direction will be considered a "Restricted Transaction." Changes to Restricted Transactions, other than

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the specific curtailments used to comply with relief obligations, cannot be made unless some alternative action is taken to compensate for the full impact on the Qualified Path. This applies to: New transaction, and Extensions or Adjustments to existing transaction."

If two or more Qualified Paths become simultaneously constrained to the point where the curtailment of contributing schedules is necessary, schedule curtailments which relieve USF on one path but increase USF on any other curtailed path shall not be made, unless specific procedures or methods are provided to address this condition. The entity shall be compliant with this standard although the required curtailments were not made.

### **C. Measures**

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Responsible Entities shall take actions as requested by Qualified Transfer Path Operators that result in the specified amount of Unscheduled Flow Relief for the applicable Qualified Transfer Path. These actions include, but are not limited to, one or a combination of schedule curtailments, schedule increases, and operation of non-Qualified Controllable Devices.

It is the responsibility of each Responsible Entity to have in place procedures for receipt of notification of a Qualified Transfer Path Operators request. Failure to provide the required USF relief or to increase USF shall not be excused due to failure to receive notification.

### **D. Compliance**

#### **1. Compliance Monitoring Process**

- 1.1 Compliance Monitoring Responsibility**  
Western Electricity Coordinating Council (WECC)
- 1.2 Compliance Monitoring Period**

The actions taken by Responsible Entities in response to requests by the Qualified Transfer Path Operators shall be documented and supplied to WECC Staff in accordance with the Plan Section 9. The WECC Staff will make specific requests for data submittal, including the specification of dates, hours, and required submittal dates.

Responsible Entities are to report the actions taken in accordance with the Plan for each hour of a curtailment period. Each Responsible Entity shall promptly provide documentation, as requested by UFAS and/or WECC Staff, of all such accommodation, control or curtailment actions taken by its dispatchers, system operators or real-time schedulers. In addition, each Transfer Path Operator shall provide documentation to the WECC staff regarding actions taken or not taken in filling its responsibilities during each curtailment period. Responsible Entities' documentation shall use formats and reporting conventions developed and monitored by the WECC Operating Committee. Responsible Entities may use the reporting applications as adopted by the Unscheduled Flow Administrative Subcommittee (UFAS) to submit curtailment data. On or before the tenth Business Day following the date of a WECC Staff USF letter request for data, each entity shall distribute to the WECC Staff the USF information at the e-mail

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addresses specified on the WECC web site. The USF information shall include the identification of Responsible Entities who failed to adjust schedules according to this USF Reduction Procedure.

Each Responsible Entity identified in SectionA.4.1 shall submit the completed USF Reduction Procedure Reporting output to the WECC Staff by no later than 5:00 p.m. Mountain Time on the tenth Business Day following the date of the WECC Staff USF letter. UFAS has developed an Administrative Practice 007 "Curtailed Event Selection Evaluation Process" that is utilized to select one event per path per month for Compliance Evaluation. WECC Staff selects one event during the first week following the month to review.

### **1.3 Data Retention**

Data will be retained in electronic form for at least one year. The retention period will be evaluated before expiration of one year to determine if a longer retention period is necessary. If the data is being reviewed to address a question of compliance, the data will be saved beyond the normal retention period until the question is formally resolved. (Source: NERC Language)

### **1.4. Additional Compliance Information**

For purposes of applying the sanctions for violations of this criterion, the "Sanction Measure" is the greater of the maximum hourly integrated MWh of "Required Relief" or "USF Increase" (truncated to the nearest MW) during the specified period multiplied by 50, and the "Specified Period" is the most recent calendar month. The sanctions shall be assessed on a monthly basis, but for purposes of determining the applicable column in the table in [Sanction Table](#), all occurrences within the specified period of the most recent calendar month and all immediately preceding consecutive calendar months in which at least one instance of non-compliance occurred shall be considered. For example, if the maximum hourly integrated Required Relief was 25 MW and the maximum hourly integrated USF Increase for the period was 30 MW, the Sanction Measure for the period would be 30 MW times 50 or 1,500. If the maximum hourly integrated Required Relief was 24 MW and the maximum hourly integrated USF Increase was 10 MW, the Sanction Measure for the period would be 24 times 50 or 1,200.

## **2. Levels of Non-Compliance**

**Sanction Measure:** Normal Path Rating

For each separate USF Schedule Curtailment event (multiple hours), the level of the non-compliance shall be based upon the magnitude of MWh relief required and the ratio of actual MWh relief provided to the required MWh of relief (truncated to the nearest MWh) for every hour that the curtailment requirement was in effect. The non-compliance levels are indicated in the table below:

Ratio of actual MWh relieved to the required MWh of relief (%) and magnitude of the required MWh of relief:	Level of Non-Compliance
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100% > percent relief 90% or required MWh of relief 5 and was not achieved.	Level 1
90% > percent relief 75% and required MWh of relief > 5.	Level 2
75% > percent relief 60% and required MWh of relief > 5.	Level 3
percent relief <60% and required MWh of relief > 5.	Level 4
Failure to Report	Level 4

If an entity during an USF Schedule Curtailment event initiates a Restricted Transaction that increases USF across the Qualified Path requesting relief, without making an equal compensating change to other transactions, the level of noncompliance shall be determined in accordance with the table below.

For each hour the percent of USF increases due to changes to Restricted Transactions	Level of Non-Compliance
0 % < USF increase 1 % of the path rating	Level 1
1 % < USF increase 2 % of the path rating	Level
2 % < USF increase 3 % of the path rating	Level
USF increase > 3 % of the path rating	Level 4

For every hour that the curtailment requirement was in effect, the level of non-compliance assessed to an entity shall be the higher level of non-compliance determined under the percent relief and USF increase tables shown above.

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### **Sanction Table**

Sanctions for non-compliance with respect to each criterion in Section B Requirements shall be assessed pursuant to the following table. All monetary sanctions shall also include sending of Letter (B).

	Number of Occurrences at a Given Level within Specified Period			
Level of Non-	1	2	3	4 or more
Level 1	Letter (A)	Letter (B)	Higher of \$1,000 or \$1 per MW of Sanction Measure	Higher of \$2,000 or \$2 per MW of Sanction Measure
Level 2	Letter (B)	Higher of \$1,000 or \$1 per MW of Sanction Measure	Higher of \$2,000 or \$2 per MW of Sanction Measure	Higher of \$4,000 or \$4 per MW of Sanction Measure
Level 3	Higher of \$1,000 or \$1 per MW of Sanction Measure	Higher of \$2,000 or \$2 per MW of Sanction Measure	Higher of \$4,000 or \$4 per MW of Sanction Measure	Higher of \$6,000 or \$6 per MW of Sanction Measure
Level 4	Higher of \$2,000 or \$2 per MW of Sanction Measure	Higher of \$4,000 or \$4 per MW of Sanction Measure	Higher of \$6,000 or \$6 per MW of Sanction Measure	Higher of \$10,000 or \$10 per MW of Sanction Measure

Letter (A): Letter to Responsible Entity's Chief Executive Officer informing the Responsible Entity of noncompliance with copies to NERC, WECC Member Representative, and WECC Operating Committee Representative 3.

Letter (B): Identical to Letter (A), with additional copies to (i) Chairman of the Board of Responsible Entity (if different from Chief Executive Officer), and to (ii) state or provincial regulatory agencies with jurisdiction over Responsible Entity, and, in the case of U.S. entities, FERC, and Department of Energy, if such government entities request such information.

The "Specified Period" and the "Sanction Measure" are as specified in Section D1.4 for each criterion.

Sanctions shall be assessed for all instances of non-compliance within a Specified Period. For example, if a Responsible Entity had two instances of Level 1 non-compliance and one instance of Level 3 non-compliance for a specific criterion in the first Specified Period, it would be assessed the sanction from Column 2 of the Level 1 row, and the sanction from Column 1 of the Level 3 row.

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3 Copies of Letter A and Letter B will be sent to WECC Member Representative and WECC Operating Committee Representative when the Generator Operator is a WECC member.

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If the Responsible Entity fails to comply with a given criterion for two or more consecutive Specified Periods, the sanctions assessed at each level of noncompliance for the most recent Specified Period shall be the sanction specified in the column immediately to the right of the indicated sanction. For example, if a Responsible Entity fails to comply with a given criterion for two consecutive Specified Periods, and in the second Specified Period the Participant has one instance of Level 1 non-compliance and two instances of Level 3 non-compliance, it would be assessed the sanction from Column 2 of the Level 1 row, and the sanction from Column 3 of the Level 3 row. If the sanction assessed at the highest level is the sanction in Column 4, no such modification of the specified sanction shall occur.

## **DEFINITIONS**

Unless the context requires otherwise, all capitalized terms shall have the meanings assigned in the Reliability Agreement and as set out below:

**Business Day** means any day other than Saturday, Sunday, or a legal public holiday as designated in section 6103 of title 5, U.S. Code.

**Disturbance** means (i) any perturbation to the electric system, or (ii) the unexpected change in ACE that is caused by the sudden loss of generation or interruption of load.

**Extraordinary Contingency** shall have the meaning set out in Excuse of Performance, section B.4.c.

**Normal Path Rating** is the maximum path rating in MW that has been demonstrated to WECC through study results or actual operation, whichever is greater. For a path with transfer capability limits that vary seasonally, it is the maximum of all the seasonal values.

**WECC Table 2** means the table maintained by the WECC identifying those transfer paths monitored by the WECC regional Reliability coordinators. As of the date set out therein, the transmission paths identified in Table 2 are as listed in Attachment A to this Standard.

## **EXCUSE OF PERFORMANCE**

### **A. Excused Non-Compliance**

Non-compliance with any of the reliability criteria contained in this standard shall be excused and no sanction applied if such non-compliance results directly from one or more of the actions or events listed below.

### **B. Specific Excuses**

#### **1. Governmental Order**

The Reliability Entity's compliance with or action under any applicable law or regulation or other legal obligation related thereto or any curtailment, order, regulation or restriction imposed by any governmental authority (other than the Reliability Entity, if the Reliability Entity is a municipal corporation or a federal, state, or provincial governmental entity or subdivision thereof).



**2. Order of Reliability Coordinator**

The Reliability Entity's compliance or reasonable effort to comply with any instruction, directive, order or suggested action ("Security Order") by the WECC Reliability Coordinator for the WECC sub-region within which the Reliability Entity is operating, provided that the need for such Security Order was not due to the Reliability Entity's non-compliance with (a) the WECC Reliability Criteria for Transmission System Planning, (b) the WECC Power Supply Design Criteria, (c) the WECC Minimum Operating Reliability Criteria, or (d) any other WECC reliability criterion, policy or procedure then in effect (collectively, "WECC Reliability Standards"), and provided further that the Reliability Entity in complying or attempting to comply with such Security Order has taken all reasonable measures to minimize Reliability Entity's noncompliance with the reliability criteria.

**3. Protection of Facilities**

Any action taken or not taken by the Reliability Entity which, in the reasonable judgment of the Reliability Entity, was necessary to protect the operation, performance, integrity, reliability or stability of the Reliability Entity's computer system, electric system (including transmission and generating facilities), or any electric system with which the Reliability Entity's electric system is interconnected, whether such action occurs automatically or manually; provided that the need for such action or inaction was not due to Reliability Entity's non-compliance with any WECC Reliability Standard and provided further that Reliability Entity could not have avoided the need for such action or inaction through reasonable efforts taken in a timely manner. Reasonable efforts shall include shedding load, disconnecting facilities, altering generation patterns or schedules on the transmission system, or purchasing energy or capacity, except to the extent that the Reliability Entity demonstrates to the WECC Staff and/or the RCC that in the particular circumstances such action would have been unreasonable.

**4. Extraordinary Contingency**

- a. Any Extraordinary Contingency (as defined in subsection c); provided that this provision shall apply only to the extent and for the duration that the Extraordinary Contingency actually and reasonably prevented the Reliability Entity from complying with any applicable reliability criteria; and provided further that Reliability

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Entity took all reasonable efforts in a timely manner to mitigate the effects of the Extraordinary Contingency and to resume full compliance with all applicable reliability criteria contained in this Reliability Agreement. Reasonable efforts shall include shedding load, disconnecting facilities, altering generation patterns or schedules on the transmission system, or purchasing energy or capacity, except to the extent that the Reliability Entity demonstrates to the WECC Staff and/or the RCC that in the particular circumstances such action would have been unreasonable. Reasonable efforts shall not include the settlement of any strike, lockout or labor dispute.

- b. Any Reliability Entity whose compliance is prevented by an Extraordinary Contingency shall immediately notify the WECC of such contingency and shall report daily or at such other interval prescribed by the WECC the efforts being undertaken to mitigate the effects of such contingency and to bring the Reliability Entity back into full compliance.
- c. An Extraordinary Contingency means any act of God, actions by a non-affiliated third party, labor disturbance, act of the public enemy, war, insurrection, riot, fire, storm or flood, earthquake, explosion, accident to or breakage, failure or malfunction of machinery or equipment, or any other cause beyond the Reliability Entity's reasonable control; provided that prudent industry standards (e.g., maintenance, design, operation) have been employed; and provided further that no act or cause shall be considered an Extraordinary Contingency if such act or cause results in any contingency contemplated in any WECC Reliability Standard (e.g., the "Most Severe Single Contingency" as defined in the WECC Reliability Criteria or any lesser contingency).

### **5. Participation in Field Testing**

Any action taken or not taken by the Reliability Entity in conjunction with the Reliability Entity's involvement in the field testing (as approved by either the WECC Operating Committee or the WECC Planning Coordination Committee) of a new reliability criterion or a revision to an existing reliability criterion where such action or non-action causes the Reliability Entity's non-compliance with the reliability criterion to be replaced or revised by the criterion being field tested; provided that Reliability Entity's non-

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compliance is the result of Reliability Entity's reasonable efforts to participate in the field testing.