
**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

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

**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”**

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Regional Reliability Standard and Regional Definition of “Relief Requirement”
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- Exhibit B** — Order No. 672 Criteria
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- Exhibit D** — Standard Drafting Team Roster
- Exhibit E** — IRO-006-WECC-2 Violation Severity Level and Violation Risk Factor Analysis

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RELIEF AND WECC REGIONAL DEFINITION OF “RELIEF REQUIREMENT”**

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

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 changes⁵ 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 thereof [sic] that collectively meets the Relief Requirement.”

The modifications in proposed regional Reliability Standard IRO-006-WECC-2 correct a reference to the recently changed⁹ 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*

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).

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

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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

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 FPA²⁰ 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)

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

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 changed²⁶ 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 R1 states:

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:

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 thereof 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,

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