

**Review of FAC-501-WECC-1—Transmission Maintenance (Deferred)**

<http://www.nerc.com/files/FAC-501-WECC-1.pdf>

**VSLs for Requirements R1 and R1.1:**

Standard, Requirement	Requirement Language	Lower	Moderate	High	Severe	Comments
FAC-501-WECC-1, R1	Transmission Owners shall have a TMIP detailing their inspection and maintenance requirements that apply to all transmission facilities necessary for System Operating Limits associated with each of the transmission paths identified in table titled “Major WECC Transfer Paths in the Bulk Electric System.”	<del>The TMIP does not include associated Facilities for one of the Paths identified in Attachment 1 FAC 501-WECC-1 as required by R.1 but Transmission Owners are performing maintenance and inspection for the missing Facilities.</del>	<del>The TMIP does not include associated Facilities for two of the Paths identified in the most current Table titled “Major WECC Transfer Paths in the Bulk Electric System” as required by R.1 and Transmission Owners are not performing maintenance and inspection for the missing Facilities.</del>	<del>The TMIP does not include associated Facilities for three of the Paths identified in the most current Table titled “Major WECC Transfer Paths in the Bulk Electric System” as required by R.1 and Transmission Owners are not performing maintenance and inspection for the missing Facilities.</del> <u>Transmission Owners had a TMIP, but it did not include inspection and</u>	<del>The TMIP does not include associated Facilities for more than three of the Paths identified in the most current Table titled “Major WECC Transfer Paths in the Bulk Electric System” as required by R.1 and Transmission Owners are not performing maintenance and inspection for the missing Facilities.</del> <u>Transmission Owners do not have a TMIP.</u>	FERC staff was concerned that some elements of the requirement were not accounted for in the VSLs. For instance, what would happen if that Transmission Owner just didn’t do anything with its TMIP?  NERC staff agreed that certain elements of the VSLs were missing, and that drafting the VSLs using the number of Transfer Paths missing was not appropriate. Staff addressed this in the proposed redline.

				<u>maintenance requirements that apply to all transmission facilities necessary for System Operating Limits associated with each of the transmission paths identified in table titled "Major WECC Transfer Paths in the Bulk Electric System."</u>		
FAC-501-WECC-1, R1.1	Transmission Owners shall annually review their TMIP and update as required.	<del>Transmission Owners did not review their TMIP annually as required by R.1.1.</del> <u>N/A</u>	N/A	N/A	<u>Transmission Owners did not review their TMIP annually as required by R.1.1.</u> <del>N/A</del>	<p>FERC pointed out that, per Guideline 2, when a VSL is binary, it must be assigned a "Severe" designation.</p> <p>NERC staff agreed and appropriately assigned this VSL Severe.</p>

**Original Guideline Explanations in the June 20, 2011 Compliance Filing of WECC, Supported by NERC in a [July 21, 2011 Filing](#):**

The Commission noted that for FAC-501-WECC-1 the Lower VSL applies when the transmission maintenance and inspection plan does not include facilities for one of the paths in the Transfer Path Table, but the Transmission Owner (TO) is performing maintenance and inspection for those facilities. The Moderate VSL for FAC-501-WECC-1 applies when the transmission maintenance and inspection plan does not include facilities for two of the paths in the Transfer Path Table, and the TO is not performing maintenance and inspection for those facilities. The

Commission is concerned that it is ambiguous which VSL would apply if the transmission maintenance and inspection plan does not include facilities for one of the paths in the Transfer Path Table, and the TO is not performing maintenance and inspection for those facilities.

WECC addressed this concern by modifying the Lower and Moderate VSLs to include the scenario wherein the transmission maintenance and inspection plan does not include facilities for one or more of the paths in the WECC Transfer Path Table, but the TO is performing maintenance and inspection for those facilities (Lower), and to include the scenario where the transmission maintenance and inspection plan does not include associated facilities for one or two of the paths in the WECC Transfer Path Table, and the TO is not performing maintenance and inspection for those facilities (Moderate).