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	Lower	Moderate	High	Severe	Comments
Require-	Language					
ment						
FAC-501-	Transmission Owners			Transmission	Transmission Owners	FERC staff was
WECC-1,	shall have a TMIP			Owners had a	do not have a TMIP.	concerned that some
R1	detailing their			TMIP, but it did		elements of the
	inspection and			not include		requirement were not
	maintenance			inspection and		accounted for in the
	requirements that			maintenance		VSLs. For instance,
	apply to all			requirements that		what would happen if
	transmission facilities			apply to all		that Transmission
	necessary for System			transmission		Owner just didn't do
	Operating Limits			facilities necessary		anything with its
	associated with each			for System		TMIP?
	of the transmission			Operating Limits		
	paths identified in			associated with		NERC staff agreed
	table titled "Major			each of the		that certain elements
	WECC Transfer Paths			transmission		of the VSLs were
	in the Bulk Electric			paths identified in		missing, and that
	System."			table titled "Major		drafting the VSLs
				WECC Transfer		using the number of
				Paths in the Bulk		Transfer Paths
				Electric System."		missing was not
						appropriate. Staff
						addressed this in the
						proposed redline.
FAC-501-	Transmission Owners	N/A	N/A	N/A	Transmission Owners	FERC pointed out
WECC-1,	shall annually review				did not review their	that, per Guideline 2,

R1.1	their TMIP and	TMIP annually as	when a VSL is binary,
	update as required.	required by R.1.1.	it must be assigned a "Severe" designation.
			NERC staff agreed and appropriately assigned this VSL Severe.

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 plan does not include facilities for one of the paths in the Transfer Path Table, and the TO is not performing 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 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).