**via posting**

**TO:** Interested Industry Parties

**FROM:** Caroline Trum, Director of Wholesale Electric Activities

**RE:** Draft Minutes from March 18, 2025 WEQ BPS Western Interconnection Congestion Management Working Group Meeting

**DATE:** March 19, 2025

**WHOLESALE ELECTRIC QUADRANT**

**Business Practices Subcommittee**

**Western Interconnection Congestion Management Working Group**

**Conference Call**

**March 18, 2025 – 1:00 PM to 4:00 PM Central**

**DRAFT MINUTES**

1. **Welcome**

Mr. Phillips welcomed the participants to the meeting. Ms. Trum provided the antitrust and meeting policies reminder. The participants introduced themselves. Mr. Phillips reviewed the agenda. Mr. A. Watkins moved, seconded by Mr. Thappetaobula, to adopt the agenda. The motion passed a simple majority vote without opposition.

The participants reviewed the draft minutes from the February 20, 2025 meeting. No modifications were offered. Mr. A. Watkins moved, seconded by Mr. Thappetaobula, to adopt the draft minutes as final. The motion passed a simple majority vote without opposition. The final minutes from the meeting are available through the following hyperlink: <https://naesb.org/pdf4/weq_bps_wicm022025fm.docx>.

1. **Review and Discus Draft Standards Language to Address Standards Request R24005 / 2025 WEQ Annual Plan Item 1.b – Develop and/or modify the WEQ-008 Transmission Loading Relief – Eastern Interconnection Business Practice Standards to support congestion management processes for the Western Interconnection**

Mr. Phillips stated that Mr. A. Watkins submitted a [draft standards proposal](https://naesb.org/member_login_check.asp?doc=weq_bps_WICM031825w1.docx) and asked him to review the document. Mr. A. Watkins stated that the language leverages WEQ-008 Transmission Loading Relief – Eastern Interconnection and explained that there are several areas where additional discussion and input from participants is needed. Mr. Ashbaker asked how participants can provide feedback regarding the language. Mr. Phillips stated that the document is posted to the WEQ BPS page of the website as a work paper for the meeting and any new or revised documents will be posted as attachments for the meeting. Ms. Trum stated that any interested parties can submit feedback, comments, or proposed standards language to the NAESB office, and the documents will be posted as work papers for the next meeting of the working group. She noted that the [NAESB Current Committee Activities](https://naesb.org/committee_activities.asp) page includes information for how non-members can register for NAESB meetings and provides hyperlinks to meeting materials for the past 30 days, the current day, and the upcoming 30 days.

Mr. A. Watkins reviewed the draft standards proposal. He noted that the acronym for the initial proposed title, Equitable Relief Application (ERA), is already used within the NERC Reliability Standards. Mr. Thappetaobula suggested changing the reference to Western Interconnection Equitable Loading Relief to avoid confusion. There was general agreement with the suggestion and the use of the WELR acronym.

Mr. Hundal asked if the intent of the standards is to require RCs to use the WELR process. Mr. A. Watkins responded that XXX-1.2 permits the use of local congestion management procedures in lieu of the WELR process. Mr. Thappetaobula noted that if an RC opts to use the WELR process, the curtailment procedure may impact e-Tags that cross RC boundaries. Mr. Hundal stated that there needs to be further discussion to understand what obligations would be placed on RCs as a result of another RC utilizing the WELR process. He suggested that there could be a need to consider if specific language should be included regarding the impact to Canadian RCs and e-Tags that cross the U.S.-Canada boundary. This was added as Issue 1 on the Parking Lot Issues List.

Mr. A. Watkins stated that XXX-1.4 identifies the types of transactions that are accounted for as part of the WELR process to determine relief obligation. Mr. Thappetaobula noted that these are existing transaction types and there are not any anticipate changes to the e-Tagging process as a result of the new standards.

Mr. Thappetaobula explained calculating relief obligations as part of the WELR process will include the impact on neighboring systems of a BA using generation to serve its own load, which includes prioritization determinations of the generation-to-load (GTL). He stated that that this is addressed in section XXX-1.5 Methods to Submit Intra-BA Transactions to the ECC, which identifies two methodologies, Tag Secondary Network Transmission Service and Generator Prioritization. Mr. A. Watkins noted that as these methodologies were developed specific to the Eastern Interconnection, additional revisions are likely needed to accommodate Western Interconnection processes. He suggested that participants also may want to further define how GTL priorities are established and create requirements to support consistency in these determinations. This was added as Issue 2 on the Parking Lot Issues List.

Mr. A. Watkins noted that it may be helpful to provide more detail regarding the credit for redispatch process addressed in XXX-1.7.1. Mr. Thappetaobula offered to provide a presentation as part of a future meeting. This was added as Issue 3 on the Parking Lot Issues List.

Mr. Hundal suggested that modifications are needed to XXX-1.7.2 to better clarify if the relief obligation is based on the estimated or actual dispatch value for the Dynamic Schedule. This was added as Issue 4 on the Parking Lot Issues List.

Mr. A. Watkins stated that XXX-1.8 includes standards that address consolidating BAAs and suggested that the participants may want to include additional language to establish how a market area can be consolidated. He explained that within the Western Interconnection, market areas can have multiple BAs that can be consolidated and dispatched as a whole. This was added as Issue 5 on the Parking Lot Issues List.

The participants discussed XXX-2.2 Interchange Transaction and Intra-BA Transaction Priority When Transmission Service is Reserved on the Constrained Facility(ies) or Constrained Flowgate(s). Mr. A. Watkins noted that this section defines how the priorities established in XXX-2.1 Interchange Transactions and Intra-BA Transactions Priorities for Use with Interconnection Wide WELR Procedures are used. He explained that one of two methods are used, constrained path or weakest link, based on if the constraint can be mapped to a contract path. Mr. Hundal stated that the methodologies would be better supported by the inclusion of requirements to establish the process for mapping a constraint to a contract path. Mr. Rice agreed, but noted this may be difficult as each Transmission Service Provider likely uses its own methodology for establishing the contract path. Mr. Thappetaobula suggested that an alternative may be to consider ownership by the Transmission Service Provider for making a determination as to if the constraint has an on-path or off-path impact. Mr. Hundal supported this idea.

Mr. Rice asked if the WELR process is replacing the Unscheduled Flow Mitigation Plan (UFMP). Mr. A. Watkins responded that WELR is intended to be used in addition to UFMP. He explained that the new WEQ Business Practice Standards should not impact or require any modifications to the NERC Reliability Standards that establish the UFMP.

Mr. A. Watkins stated XXX-3.2 would establish a set cutoff for determining if a curtailment will be issued in the current hour or next hour, a difference from the TLR process established in WEQ-008 which uses operator discretion in current hour versus next-hour determinations. He suggested participants consider a 15-minute cut-off period prior to the top of the hour, meaning that any events which occur after before the 45-minute mark will result in next-hour curtailment and relief obligations. He explained that the cut-off time is intended to avoid the issuance of curtailments during the top-of-the-hour ramp period while still allowing entities sufficient time to address an exceedance of a system operating limit (SOL) within the thirty-minute timing requirement. Mr. Rice stated support for establishing a next-hour/current-hour cut-off time and suggested the cut-off time be the 40-minute mark to allow entities 20 minutes to make necessary preparations prior to the start of the hour. There was general support for making this change.

Mr. Hundal suggested the participants develop additional language to include in XXX-3.3 WELR Procedure to describe how the pro-rata curtailment of firm and non-firm transmission is carried out and the impact on intra-hour scheduling. There were added as Issues 6 and 7 on the Parking Lot Issue List.

Mr. Hundal noted that as part of UFMP, there is a requirement for entities to provide notice to all impacted parties at the start and end of an event. He suggested that XXX-3.1 and XXX-3.5 be expanded to include similar notification requirements, noting as written, XXX-3.1 only requires notice to other RCs.

Mr. Phillips asked Ms. Trum to add the comments included in the draft standards proposal not addressed during meeting discussion to the Parking Lot Issue List and to update the draft standards proposal to include the applicable abbreviations and defined terms in WEQ-000 Abbreviations, Acronyms, and Definition of Terms.

The Parking Lot Issues List is available through the following hyperlink: <https://naesb.org/pdf4/weq_bps_WICM031825a2.xlsx>

The Proposed Business Practice Standards Work Paper is available through the following hyperlink: <https://naesb.org/member_login_check.asp?doc=weq_bps_WICM031825a1.docx>

1. **Discuss Next Steps and Future Meetings**

Mr. Phillips stated that the next meeting of the working group is scheduled for Wednesday, April 16 from 1:00 – 4:00 PM Central and noted that the participants had previously discussed use the informal comment process to solicit wider input from industry regarding the proposal. He suggested that the working group aim to hold an informal comment period following the April 16 meeting, stating that this would provide four months for participants to work through the feedback and make additional revisions. There was general agreement to proceed in this manner.

Mr. Phillips asked participants to review the Parking Lot Issues List and the Proposed Business Practice Standards Work Paper and submit comments and new or revised standards language for consideration at the next meeting. He explained that this input will help ensure that the standards language is ready to send out for informal comment after the next meeting.

1. **Adjourn**

The meeting adjourned at 2:51 PM Central on a motion by Mr. Thappetaobula, seconded by Mr. A. Watkins.

1. **Attendance**

| **First Name** | **Last Name** | **Organization** |
| --- | --- | --- |
| Steve | Ashbaker | WECC |
| Rebecca | Berdahl | BPA |
| Twyana | Blair | Arizona Public Service |
| Jonathan | Booe | NAESB |
| Tanner | Brier | BPA |
| Robin | Chung | BPA |
| Emily | Granberry | SPP |
| Shawn | Grant | CAISO |
| Raj | Hundal | Powerex |
| Kevin | Johnson | BPA |
| Katrina | McEvoy | Arizona Public Service |
| Amrit | Nagi | NAESB |
| Joshua | Phillips | SPP |
| Jessie | Rice | WAPA |
| Eric | Shick | Arizona Public Service |
| Ashley | Stringer | SPP |
| Aleksandr | Tereshchenkov | Puget Sound Energy |
| Raja | Thappetaobula | CAISO |
| Caroline | Trum | NAESB |
| Alex | Watkins | SPP |
| Michael | Watkins | Seattle City Light |