**via posting**

**TO:** Interested Industry Parties

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

**RE:** Final Minutes from July 28, 2025 WEQ BPS Western Interconnection Congestion Management Working Group Meeting

**DATE:** July 29, 2025

**WHOLESALE ELECTRIC QUADRANT**

**Business Practices Subcommittee**

**Western Interconnection Congestion Management Working Group**

**Conference Call**

**July 28, 2025 – 1:00 PM to 4:00 PM Central**

**FINAL 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. Ashbaker moved, seconded by Mr. A. Watkins, to adopt the agenda. The motion passed a simple majority vote without opposition.

The participants reviewed the draft minutes from the July 17, 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 for the meeting are available through the following hyperlink: <https://naesb.org/pdf4/weq_bps_WICM071725fm.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 during the prior meeting, the participants began review of the [Combined Informal Comments Work Paper](https://naesb.org/member_login_check.asp?doc=weq_bps_WICM072825w1.docx) that includes the responses submitted by [APS](https://naesb.org/pdf4/weq_bps_WICM071725w4.docx), [Seattle City Light](https://naesb.org/pdf4/weq_bps_WICM071725w5.docx), and [BPA](https://naesb.org/member_login_check.asp?doc=weq_bps_WICM071725w7.docx) as well as [Mr. Hundal](https://naesb.org/member_login_check.asp?doc=weq_bps_WICM071725w6.docx).

The participants picked back up with discussion on WEQ-XXX-2.3. Mr. A. Watkins noted that as discussed during the previous meeting, the weakest link method and constrained path method are not separate procedures with documentation outside of the standards. The participants agreed to make similar changes to WEQ-XXX-2.3 as was made to WEQ-XXX-2.2 to provide additional clarity.

Mr. Hundal suggested that there may be further revisions to WEQ-XXX-2.3 and the related standards that could better align the language with WEQ-XXX-2.2 and provide additional clarity. Mr. Johnson agreed, noting that WEQ-XXX-2.3 uses a double negative. He explained that BPA proposed modifications to better clarify the meaning of WEQ-XXX-2.3.1 but that the standard may not be needed as the language appears to be duplicative of requirements in WEQ-XXX-2.3. The participants agreed to further revise WEQ-XXX-2.3 and strike WEQ-XXX-2.3.1.

The participants discussed WEQ-XXX-2.3.2. Mr. Johnson stated that “tagged Intra-BA Transaction” is a more inclusive term than “tagged PTP Intra-BA Transaction.” He suggested that participants drop “PTP” so as to not inadvertently exclude transactions. Mr. Thappetaobula noted that the standard, as well as several others, still contain references to the Contract Path. Mr. A. Watkins stated that he will do a review to strike references to the contract path as part of his action item assignments from the last meeting.

Ms. Berdahl suggested that WEQ-XXX-2.3.2.2 should be revised into multiple sentences to create more concise language that is easier to understand. Mr. Thappetaobula noted that the standard includes language related to curtailing Non-Firm Transmission Service prior to Firm Transmission Service. He stated that this language is duplicative of WEQ-XXX-2.1 which establishes the priority of Interchange and Intra-BA Transactions and suggested the language be struck. Mr. A. Watkins agreed that the language is repetitive. He asked if WEQ-XXX-2.3.2.1 and WEQ-XXX-2.3.2.2 should be struck in their entirety. Mr. Lowe suggested that the language related to curtailing firm prior to non-firm in WEQ-XXX-2.3.2.2 be removed but proposed the rest of the standard as well as WEQ-XXX-2.3.2.1 remain. He explained that these two standards provide important clarifying language that makes clear how the RC assigns priority as part of the weakest link method.

The participants discussed WEQ-XXX-3. Ms. Berdahl stated that additional specificity within the standards in regards to the Western Interconnection Unscheduled Flow Mitigation Plan would be helpful. She suggested that the standards specifically use the proper name rather than making generic references. Mr. Phillips stated that the Western Interconnection Unscheduled Flow Mitigation Plan and WIUFMP abbreviation can be included in WEQ-000. He noted that if the new standards are going to include the specific reference, then participants needs to be careful when crafting the language so as to not inadvertently overlap or create inconsistency with the WIUFMP reliability requirements. Mr. Ashbaker stated that the reliability requirements are included in NERC Reliability Standard IRO-006-WECC-3. Mr. Phillips asked if there could be a potential consistency issue in the future if the WEQ Business Practice Standard references WIUFMP and a decision is made to no longer use or modify the process. Mr. A. Watkins noted that the language is intended to make clear that the WLR process is just one of several that an RC can elect to use. He stated that as written, WEQ-XXX-3 does not require use of any specific procedure. The participants agreed to include WIUFMP in WEQ-XXX-3 and discuss this topic further during a subsequent meeting.

Mr. Lowe asked if additional revisions should be considered to better clarify that the RC should be making determinations on the use of WLR or other congestion management processes in coordination with other impacted entities. Mr. Hundal stated that this is similar to his comment on WEQ-XXX-3.3.1. Mr. Thappetaobula noted that WEQ-XXX-1.2 explicitly states that the RC is allowed to implement a local congestion management procedure. Mr. A. Watkins stated that together, WEQ-XXX-1.2 and WEQ-XXX-3 capture that the RC has several different options to address congestion, including WLR which will provide a mechanism to implement a market-wide process. He explained that RC coordination with BAs and transmission providers is an important factor in making the determination on which process should be used and that these coordination requirements are typically documented through entity specific business practices. Mr. A. Watkins noted that coordination processes vary based on the region or footprint of the RC or BA. He suggested that including such requirements in the standards may be overly burdensome.

The participants discussed WEQ-XXX-3.3.2.1. Mr. Johnson stated that BPA proposed minor revisions to add clarity to the language. He noted that the standard references “GTL relief obligations” but that this may be unintentionally limiting as the new suite of standards contemplates that relief obligations may be assigned for other types of transactions. The participants developed additional changes consistent with the intent of the proposed modification by BPA. Mr. Hundal stated that he would review the modifications to determine if the changes address his comment.

The participants discussed WEQ-XXX-3.3.2.6. Mr. Hundal noted that WEQ-XXX-3.3.2.6 states that using the WLR process, transactions will be curtailed on a pro-rata basis. He asked if the WLR process will differentiate between “on-path/off-path transactions” similar to the transaction priorities established in the WIUFMP. Mr. A. Watkins stated the WLR process does not make the “on-path/off-path” distinction because the process is intended to address congestion at the specific point of constraint. He explained that curtailments and relief obligations are based on a transaction’s impact to the constraint. He stated that priority is determined using the weakest link or constrained facility methods detailed in WEQ-XXX-2.2 and 2.3.

The participants discussed WEQ-XXX-3.3.2.7. Mr. Johnson stated that the participants may want to consider if there are formatting or wording changes to this standard and WEQ-XXX-3.3.2.8 that could add clarity. He noted that these two standards are specific to relief obligations whereas the other requirements in this subsection address curtailments. Mr. A. Watkins agreed that WEQ-XXX-3.3.2 includes several different requirements that must be read together to contextualize the full meaning. He suggested participants provide proposals to re-organize the standards if another arrangement would improve readability. Mr. Johnson noted that the standard references several specific types of transactions. Mr. A. Watkins stated that there may be alternative, simplified language that can be considered as additional clean-up for consistency with the assumption that GTL will be treated as firm.

The Combined Informal Comments as revised during the meeting available through the following hyperlink: <https://naesb.org/member_login_check.asp?doc=weq_bps_WICM072825a1.docx>.

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

Mr. Phillips stated that the next meeting of the working group is scheduled for Thursday, August 7. He noted that during the meeting, participants will finish review of the informal comments and make a determination on how to address any outstanding issues. Mr. A. Watkins stated that a completed review of the informal comments would be helpful in developing the proposed revisions that have been discussed. The participants agreed to schedule an additional meeting for Wednesday, August 13 from 1:00 – 4:00 PM Central to discuss the additional revisions Mr. A. Watkins is drafting based on the review of the informal comments.

Mr. Phillips suggested that participants discuss during the August 13, 2025 meeting if further meetings will be required in order to finalize the draft and vote on a recommendation during the September 2, 2025 meeting. He noted that the WEQ BPS will need to meet and vote on the recommendation before a formal industry comment period can begin. Ms. Trum stated that the cutoff for a recommendation to be considered during the upcoming meeting of the WEQ Executive Committee is September 17, 2025.

1. **Adjourn**

The meeting adjourned at 3:57 PM Central on a motion by Mr. Thappetaobula.

1. **Attendance**

| **First Name** | **Last Name** | **Organization** |
| --- | --- | --- |
| Steve | Ashbaker | WECC |
| Rebecca | Berdahl | BPA |
| Tanner | Brier | BPA |
| Alexis | Campbell | Portland General Electric |
| Robin | Chung | BPA |
| Katie | Davis | BPA |
| Tina | Gary | Portland General Electric |
| Raj | Hundal | Powerex |
| Kevin | Johnson | BPA |
| William | Kluza | PacifiCorp |
| Brian | Lowe | PacifiCorp |
| Amrit | Nagi | NAESB |
| Joshua | Phillips | SPP |
| Kyle | Ramey | PacifiCorp |
| Mandee | Ripley | OATI |
| Patty | Satkiewicz | PacifiCorp |
| Raja | Thappetaobula | CAISO |
| Caroline | Trum | NAESB |
| Alex | Watkins | SPP |
| Michael | Watkins | Seattle City & Light |
| Jeremy | West | OATI |