**Arizona Public Service Company**

**Informal Comments Re: WEQ BPS Western Interconnection Congestion Management**

1. **Proposed Draft Revisions to WEQ-000 Abbreviations, Acronyms, and Defined Terms**
   1. Enhanced Curtailment Calculator (ECC)
      * + APS would like clarification on the ECC as the current webECC tool can only perform curtailments on qualified paths. APS would like to recommend or ensure that the ECC is looking at all flowgates in the system, not just qualified paths.
        + Utilizing only qualified paths is a limitation as there are only a handful of qualified paths in the entire Western Interconnection.
        + The qualification process is long and difficult and utilizing available flowgates in webECC will allow quicker action as it relates to congestion relief.
2. **Initial Proposed Draft WEQ Business Practice Standards: Western Interconnection Equitable Loading Relief (WELR)**
   1. USE OF WELR PROCEDURES
      * + APS supports the Reliability Coordinator to Reliability Coordinator coordination.
   2. USE OF LOCAL PROCEDURES
      * + APS appreciates the ability to implement a local congestion management procedure as it gives the flexibility to manage congestion in areas outside of the Bulk Electric System.
   3. MECHANISMS FOR ACHIEVING GTL RELIEF
      * + What would the assigned GTL relief obligation look like and how does the Market Operator implement the obligation? Is it a MW reduction of flow on the constrained flowgate or a MW redispatch of specific generators?
   4. INTERCHANGE TRANSACTION AND INTRA-BA TRANSACTION PRIORITY WHEN TRANSMISSION SERVICE IS RESERVED ON THE CONSTRAINED FACILITY(IES) OR CONSTRAINED FLOWGATE(S)
      * + Define or provide a link to the “constrained path method procedure.”
   5. INTERCHANGE TRANSACTION AND INTRA-BA TRANSACTION PRIORITY WHEN TRANSMISSION SERVICE IS NOT RESERVED ON THE CONSTRAINED FACILITY(IES) OR CONSTRAINED FLOWGATE(S)
      * + Define or provide a link to the “weakest link method procedure.”