**via posting**

**TO:** Interested Industry Parties

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

**RE:** Final Minutes from August 7, 2025 WEQ BPS Western Interconnection Congestion Management Working Group Meeting

**DATE:** August 12, 2025

**WHOLESALE ELECTRIC QUADRANT**

**Business Practices Subcommittee**

**Western Interconnection Congestion Management Working Group**

**Conference Call**

**August 7, 2025 – 10:00 AM to 1:00 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. Thappetaobula moved, seconded by Mr. Rice, to adopt the agenda. The motion passed a simple majority vote without opposition.

The participants reviewed the draft minutes from the July 28, 2025 meeting. No modifications were offered. Mr. Thappetaobula moved, seconded by Ms. Berdahl, 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_WICM072825fm.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**

The participants discussed the remaining informal comments in the [Combined Informal Comments Work Paper](https://naesb.org/member_login_check.asp?doc=weq_bps_WICM080725w1.docx), beginning with WEQ-XXX-3.3.2.8.

Ms. Chung asked the intent of the language in the standard. Mr. Thappetaobula explained that the standard is intended to prevent new non-firm transactions or increases to existing non-firm transactions that would have an impact above the curtailment threshold on a constraint during a WLR event. He stated that under the WLR process, new requests would not be allowed to flow if other transactions of that same priority level are being curtailed. Ms. Chung asked how often a RC is expected to calculate the assigned relief obligation during a WLR event. Mr. Thappetaobula stated that the relief obligation is calculated on an hourly basis until the constraint is resolved.

Ms. Chung suggested that additional detail is needed within the standard regarding the timing of the WLR relief calculation. She noted that there may be scenarios in which the assigned WLR relief obligation could be achieved without the full curtailment of all non-firm transactions. She asked if disallowing new non-firm transactions or increases to existing non-firm transactions while allowing portions of other non-firm transactions to flow would create an equity issue. Mr. Hundal stated that the treatment of requests for new or adjusted non-firm transactions within the proposed standard is similar to how such requests are addressed as part of other congestion management procedures. He explained that as with other procedures, preventing the flow of additional megawatts that would exacerbate a constraint should not create an equity issue as the intent is to alleviate the area of constraint and the action is appropriate for reliability purposes.

Ms. Chung noted that there could be instances in which a request for a new or adjusted transaction is submitted prior to the e-Tagging deadline but after the RC has assigned WLR relief obligations. She asked if the RC should recalculate the relief obligations factoring in the requested megawatts of the new or adjusted transaction. Mr. Hundal stated that allowing the additional flow of megawatts that would further contribute to an area of constraint after the constraint has been identified would not be prudent, even if the request was timely submitted. He explained that a cutoff deadline is necessary to avoid a continuous cycle of calculating, assigning, modifying, and then re-issuing the curtailments and relief assignments.

Mr. Rice stated that some BAs allow requests for intra-hour transactions. He asked the WLR curtailments should be recalculated based on timely submitted intra-hour transactions. Mr. Hundal suggested that an unintentional equity issue could be created by a requirement to re-calculate a previously assigned WLR curtailment based on subsequent requests, even if those requests are timely submitted. He explained that generally, all other factors equal, submittal time is a determinant for approving a request, meaning that timely but subsequently submitted requests can only flow if there is available capacity. He stated that if not for the WLR event, the curtailed transactions would be flowing as requested and that restoration of these requests should have priority over allocating capacity to any new requests. Mr. Phillips noted that XXX-3.3.3.1 to XXX-3.3.3.4 address this concept and specify the process for reloading to fill any available transmission capacity.

Ms. Chung stated that based on the discussion, BPA is in agreement that the WLR relief assignment should not be recalculated to accommodate subsequently submitted requests and that there is not an equity issue to address. She suggested that additional specificity would be helpful to clearly identify the cutoff point. Mr. Phillips asked if including a reference to the WLR Transaction Deadline would beneficial.

Ms. Berdahl noted that the definition for WLR Transaction Deadline specifies that the term represents the cutoff time for an approved e-Tag to be included in the calculated WLR relief obligation but does not state when this occurs. Mr. Thappetaobula stated that WEQ-XXX-3.2 uses the submitted timing of the WLR event to determine if a curtailment is to be issued within the current hour or for the next hour. He noted that per the standard, a WLR event initiated before XX:40 will result in an RC issuing relief obligations for the current hour and after XX:40 for the next hour. Mr. West noted that the specified cutoff time for current hour/next hour curtailment in WEQ-XXX-3.2 is similar to the WIUFMP process but differs from the Eastern Interconnection TLR process that has varied curtailment times based on TLR level. He stated that tying the curtailment window to scheduling practices should not a significant impact on the overall WLR process for congestion management.

The participants discussed if the standards or definition for WLR Transaction Deadline should identify a specific cutoff time of XX:40 to align with WEQ-XXX-3.2. Mr. West explained that the IDC use all approved transactions at the time a TLR event is initiated to determine the relief obligations. Mr. West noted that unlike the current hour/next hour curtailment timing, establishing a specified time marker for the inclusion of transactions in a WLR event may be a substantive change to the WLR process as this could be a limitation on when an RC can start taking action to alleviate a constraint.

Mr. Thappetaobula suggested that a specified time marker for the WLR Transaction Deadline may be too proscriptive if it will impact the flexibility an RC has to address congestion. He proposed the definition for WLR Transaction Deadline identify the cutoff time as the initiation of the WLR event. Ms. Chung and Mr. Hundal agreed. Ms. Chung proposed the phrase “after the WLR event is initiated” be added to WEQ-XXX-3.3.2.8. She stated that these two changes will sufficiently define the timing deadline and make clear to entities that transactions submitted after a WLR event is initiated will be curtailed if the transaction is above the established curtailment threshold.

The participants discussed WEQ-XXX-3.3.3.2 and WEQ-XXX-3.3.3.3. Ms. Chung stated that both standards make reference to “holding” a transaction which is not a concept within the Western Interconnection. Mr. West noted that “hold” may be used as a placeholder to represent generalized e-Tagging concepts. He stated that there are two different concepts being addressed within the standards, new transactions submitted after the WLR event and upward adjustments of existing transactions submitted after the WLR event. Ms. Chung suggested that “hold” should either be defined as a new concept or the standards be reworded to more accurately describe the intent of the action to avoid confusion. Mr. West agreed that additional detail could be beneficial. The participants reworded the standards to replace the phrase “hold” with “not allowed to flow.” Ms. Chung stated that this modification provides additional clarity while helping to ensure that new transactions which could be eligible for reload are not denied.

The participants discussed WEQ-XXX-3.3.3.4. Mr. Johnson asked if the standard should be modified to allow the RC flexibility in when the notification for the end of a WLR event issued. Mr. Phillips suggested that announcing the anticipated end of a WLR event may before the system has returned to a reliable state may cause confusion if circumstances change and the WLR event continues into the next hour. Mr. Thappetaobula noted that there are other procedures and processes that describe actions that an RC can take dependent on the state of the system. He stated that the ability of the RC to carry-out these processes would not be predicated on announcing the end of the WLR event. No modifications were made to the standard.

The participants reviewed the remaining informal comments that had been flagged for later discussion.

The participants discussed WEQ-XXX-1.1. Mr. Lowe noted that the WIUFMP defines actions that must be taken for each step of the process, dependent upon the progress of alleviating a constraint. He asked if there are similar requirements for WLR. Mr. Thappetaobula responded the decision to initiate an WLR event is made by the RC who should be in communication with the BA, Transmission Service Provider, and other impacted entities. He stated that WEQ-XXX-1.2 allows for the use of local procedures and that WEQ-XXX-3.3.1 requires the RC to use parallel visualization tools prior to implementing a WLR procedure.

Mr. Johnson stated that there is an assumption within the standards that the RC will be coordinating and communicating with other entities but that the current language does not incorporate this concept. He suggested adding a coordination requirement to require communication between the RC, BA, Transmission Service Provider, and Transmission Operator before a WLR event is initiated. Ms. Chung noted that unlike WIUFMP which is initiated by the path operator, WLR events are initiated by the RC. She stated that any coordination or communication requirement would need to be carefully worded so as to not limit the RC’s ability to take needed action to address congestion. Ms. Berdahl suggested adding a sentence to clarify that the BA, Transmission Service Provider, and Transmission Operator can request an RC initiate the WLR process. There was general agreement to make this change.

The participants discussed WEQ-XXX-3.3.2.7. Mr. Johnson stated that there are three separate concepts addressed as part of WEQ-XXX-3.3: curtailment, relief obligation, and reload and reallocation. He suggested that adding headers for these subsections will create additional clarity and avoid confusion. There was general agreement to make this change.

The participants reviewed and updated the Parking Lot Issues List, available through the following hyperlink: <https://naesb.org/pdf4/weq_bps_WICM080725a1.xlsx>

The revisions made to the draft standards to address the informal comments can be viewed at the following hyperlink: <https://naesb.org/member_login_check.asp?doc=weq_bps_WICM080725a2.docx>.

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

Mr. Phillips stated that the next meeting of the working group is scheduled for Wednesday, August 13, 2025 during which the participants will work to finalize the draft based on the additional modifications to address Action Items 14, 15, and 16. He noted that the working group has a subsequent meeting scheduled for Tuesday, September 2, 2025 and that the WEQ BPS is scheduled to hold a meeting on Friday, September 12, 2025 to consider and vote on the working group’s recommendation.

Mr. Hundal stated that there have been a number of changes to the draft standards based on the informal comment period. He asked if finalizing the recommendation is premature. Mr. Thappetaobula noted that the received feedback did not identify any contentious issues and that the majority of the changes were clarifying in nature. Mr. Hundal suggested the working group consider holding an additional informal comment period following the meeting on August 13, 2025. Mr. Thappetaobula agreed this could be beneficial to help ensure the working group addresses any issues with the standards prior to finalizing the draft.

1. **Adjourn**

The meeting adjourned at 12:34 PM Central on a motion by Ms. Davis.

1. **Attendance**

| **First Name** | **Last Name** | **Organization** |
| --- | --- | --- |
| Cory | Anderson | Seattle City Light |
| Steve | Ashbaker | WECC |
| Rebecca | Berdahl | BPA |
| Jonathan | Booe | NAESB |
| Tanner | Brier | BPA |
| Robin | Chung | BPA |
| Katie | Davis | BPA |
| Raj | Hundal | Powerex |
| Kevin | Johnson | BPA |
| Brian | Lowe | PacifiCorp |
| Amrit | Nagi | NAESB |
| Joshua | Phillips | SPP |
| Kyle | Ramey | PacifiCorp |
| Jessie | Rice | WAPA |
| Mandee | Ripley | OATI |
| Eric | Shick | APS |
| Raja | Thappetaobula | CAISO |
| Caroline | Trum | NAESB |
| Jeremy  | West | OATI |