

# FERC Order 676-J Overview

CBPI

June 15, 2022

Mike Steigerwald



# Overview

- Issued on 05/20/21. Incorporates all of the drafted NAESB v003.3 standards.
- OATI working on implementation to meet compliance deadlines for jurisdictional entities:
  - Cybersecurity changes were due for implementation: 06/07/22.
  - The rest of the standards are due for implementation: 01/27/23.
- BPA has not set an implementation timeline, but it will likely lag the industry.
- BPA intends to implement the standards in alignment with NAESB.
- Customer impact is limited compared to Order 676-I.
- Changes that do impact customers will be covered in future CBPI calls as those changes are rolled out.

# Planning Redispatch

## Current:

- No capability on OASIS for the posting of 3<sup>rd</sup> party offers of Planning Redispatch service.
- Planning Redispatch was identified as a tariff gap under the PFGA process.

## New Standard:

- Required by FERC.
- Transmission Providers are to make available on OASIS a way for 3<sup>rd</sup> parties to post offers of Planning Redispatch. There will also be a way for customers to query these offers.
- Nobody is required to actually use this functionality.
- It is the responsibility of the customer to initiate a meeting between the customer, TP, and potential provider of Planning Redispatch service.
- NAESB compliance is met once the OASIS capability is available for use.

# OASIS Templates

## Current:

- Some sophisticated customers query OASIS using templates as an API.
- Some templates are limited in the number of query variables that can be used, resulting in the customer having to make multiple queries.

## New Standard:

- Adds a “list” feature to several templates to make queries more flexible.
- Queries using this “list” feature can include multiple search values in a single query (such as multiple AREFs), which may result in fewer queries being needed.

# Managed Encumbrance

## Current:

- An encumbrance in this case is a “use” of a parent reservation. An encumbrance (such as a Resale or Redirect) reduces the available reserved capacity on a reservation.
- In the east, Pseudo-ties rely on reservations, but are not tagged. The result is a “use” of the reservation that is not actually reflected on OASIS as a reduction. The reservation can then easily be oversubscribed.

## New Standard:

- Provides a generic or “ad-hoc” encumbrance mechanism for a reservation on OASIS.
- Reduces the use of the parent just like a Resale, Redirect, etc.
- Will be used in the east to manage untagged Pseudo-ties.
- Pseudo-ties are tagged in the west, so this should not be needed.
- Instead, in the west this will just be an “ad-hoc” mechanism that may be called upon by the customer to reduce a parent reservation for an uncategorized reason.

# PTP Rollover and Dynamic Notification

## Current:

- Customers holding LTF with rollover rights must submit a RENEWAL by the rollover deadline or they lose their rollover rights.
- BPA has implemented internal controls to ensure customers do not forget to rollover their service. But there is no notification available on OASIS.

## New Standard:

- There will be a way for customers to subscribe to OASIS notifications when their rollover is coming due.
- This project includes the implementation of a generic OASIS email subscription process.
- This generic OASIS subscription process will replace the manual PCM notifications outlined in the Preemption and ROFR User Guide.

# NITS

## Current:

- As NITS was being implemented across the industry, OATI and other providers identified a bin list of items that needed to be revisited: things missed, corrections, functionality overlooked, etc.

## New Standard:

- The NITS standards have been updated in several ways to incorporate these identified changes.
- Several of the items are related to Scheduling Rights or other things that have not yet been implemented by BPA.

# Posting of Curtailment Info on OASIS

## Current:

- There are no NAESB standards requiring that curtailment information be posted on OASIS.
- Despite this, BPA *does* post curtailments to OASIS when interties or interconnections are curtailed.

## New Standard:

- Curtailments from “interconnection-wide congestion management events” are now required to be posted to OASIS.
- This only includes curtailments issued by RC West using webECC. These curtailments are not issued by BPAT personnel.
- Curtailments issued by BPA are not required to be posted to OASIS.
- Because we already post some curtailment data to OASIS, we will likely continue to do so.



# OASIS Cybersecurity

## Current:

- DOE asked Sandia National Laboratory (SNL) to conduct a review of the NAESB standards for cybersecurity risks.

## New Standard:

- OASIS standards have been updated to incorporate SNL recommendations.
- Most of the standards here are things that OATI must comply with as the TSIP for BPA.
- The compliance date was June 7<sup>th</sup>. OATI has completed the necessary changes.

# Tag Timing

## New Standard:

- The tag timing standards have been updated to better align with NERC INT-006.
- BA/TPs will have 1 minute less to respond to a tag request than under the prior timing tables.
- This standard was met with the implementation of eTag 1.8.4 in Sept 2020.

# NHM

## Current:

- The WEQ-001 standards seem to suggest that the use of tag priority 0-NX is used only when offering Next Hour Market (NHM) service.
- Very few entities offer NHM. BPAT does not.
- Several entities in the west use 0-NX for tagging in the EIM, but they do not offer NHM.
- There was an open compliance question of whether entities could use 0-NX outside of NHM.

## New Standard:

- The standards have been updated to clarify that:
  - Entities that offer NHM service must use 0-NX for tagging.
  - However, entities may also use 0-NX for other purposes as needed outside of NHM.
- BPA does not use 0-NX for EIM.

# Retirement of NERC INT Standards

## Current:

- NERC has retired the following standards: INT-004-3.1, INT-010-2.1, INT-006 (R3.1, R4, and R5), INT-009 (R2).
- NERC requested that NAESB consider adopting these instead.

## New Standard:

- The tagging standards WEQ-004 have been updated to incorporate these INT standards.
- In most cases, the language was copied almost directly from NERC.
- Scope includes requirements for RF1 in emergency situations, as well as requirements that Pseudo-ties be registered in the EIR.

# Retirement of NERC MOD Standards

## Current:

- Standards for how to calculate ATC (eg, ATC Modeling) are governed by NERC MOD standards.
- NERC has petitioned FERC to retire the NERC MODs and transition ownership of ATC Modeling standards to NAESB.

## New Standard:

- NAESB has drafted ATC Modeling standards consistent with NERC MODs into book WEQ-023.
- FERC has adopted WEQ-023 as drafted.
- FERC has not yet retired the NERC MODs.
- BPA will need to ensure alignment with WEQ-023.