FERC Order 676-J Overview

CBPI
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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:
  o Cybersecurity changes were due for implementation: 06/07/22.
  o 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 3rd 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 3rd 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.
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.
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 7th. 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.
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:
  o Entities that offer NHM service must use 0-NX for tagging.
  o 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.