



*Western Electricity Coordinating Council*

**WECC  
COMPLIANCE ENFORCEMENT PROGRAM**

**WECC Supplemental  
Registration Criteria  
And  
Registration Dispute Process**

Prepared by  
Steve McCoy – Director of Compliance

The *WECC Entity Supplemental Registration Criteria and Dispute Process* will be updated as needed to meet the reliability needs of the Western Interconnection and as revisions to the *NERC Statement of Compliance Registry Criteria* are made.

## Revision Sheet

Release No.	Date	Revision Description
Rev. 0.1	2/16/07	Drafted
Rev. 1.0	3/5/07	Section 3.1 / Material Impact – Major changes Section 3.4 / Retail and Wholesale Access Customers – New Section Section 3.6 / Systems and Units Connected Under 100 KV – Revised and generating units added. Section 3.7 / RSG – New Section Section 3.9 / Formal Agreements for Joint Registrations

## Table of Contents

---

Table of Contents .....	ii
1. General Information.....	3
1.1. Introduction.....	3
1.2. Contact Information.....	3
2. WECC Adherence to the NERC Statement of Compliance Registration Criteria.....	4
3. WECC Supplemental Registration Criteria .....	4
3.1. Material Impact to the Bulk Power System .....	4
3.2. Disagreements on Requests for Variations of Registration Criteria .....	5
3.3. Aggregation of Load.....	5
3.4. Retail and Wholesale Access Customers .....	5
3.5. Definition of Peak Load .....	6
3.6. Systems and Units Operated Under 100 KV .....	6
3.7. Reserve Sharing Groups (RSG) .....	6
3.8. Delegation Agreements for Delegated Tasks .....	6
3.9. Formal Agreements for Joint Registrations.....	7
4. WECC Registration Dispute Process .....	7

## 1. General Information

---

### 1.1. INTRODUCTION

The current entity Registration is being conducted pursuant to the *NERC Statement of Compliance Registry Criteria* (Revision 3 - February 6, 2007). WECC has developed the *WECC Entity Supplemental Registration Criteria and Dispute Process* to supplement and further clarify the Registration process for the Western Interconnection and to provide a dispute process. The goal of this supplemental criteria and dispute process is to resolve as many registration disputes within the WECC region as possible.

### 1.2. CONTACT INFORMATION

Any questions regarding the WECC supplemental registration criteria or the dispute process please contact:

Contact: Steve McCoy – WECC Director of Compliance

Address: WECC  
University of Utah Research Park  
615 Arapeen Drive, Suite 210  
Salt Lake City, Utah 84108

Phone: (801) 582-0353  
Email: smccoy@wecc.biz

Contact: Lisa Milanese – WECC Manager of Compliance Administration

Address: WECC  
University of Utah Research Park  
615 Arapeen Drive, Suite 210  
Salt Lake City, Utah 84108

Phone: (801) 582-0353  
Email: lmilanes@wecc.biz

## **2. WECC Adherence to the NERC Statement of Compliance Registration Criteria**

---

WECC will use the *NERC Statement of Compliance Registry Criteria* for registration in the Western Interconnection.

WECC requires any entity that meets the MW and KV criteria to submit their registration information. WECC will register all entities that meet the MW and KV criteria unless the entity requests a variance from the registration.

For any requested variance from the criteria it will be the responsibility of the Candidate Entity to demonstrate that the variance will not impact the reliability of the Western Interconnection.

For entities that are requesting a variance, WECC will hold the submitted registration until the variance is approved or dis-approved. If WECC does not approve the request for variance the registration will be submitted to NERC.

Any entity that meets the MW and KV criteria in the *NERC Statement of Compliance Registry Criteria* that does not submit their registration information will be registered by WECC.

## **3. WECC Supplemental Registration Criteria**

---

The following sections address additional registration criteria needed to supplement or clarify the NERC registration criteria for the Western Interconnection. In all cases, the WECC supplemental criteria are meant to enhance reliability by ensuring that the WECC Registration is complete and accurate.

### **3.1. MATERIAL IMPACT TO THE BULK POWER SYSTEM**

Some entities that meet the MW and KV criteria of the *NERC Statement of Compliance Registry Criteria* have notified WECC that they do not believe they should be registered because they do not have a material impact to the bulk power system. WECC is unable at this time to determine a better method of evaluating material impact than the MW and KV criteria contained in the *NERC Statement of Compliance Registry Criteria*. The evaluation of these requests is further complicated by the aggregated effects of similar requests in the same area as specifically recognized in Note 5 of the *NERC Statement of Compliance Registry Criteria*.

FERC and NERC have emphasized consistency and uniformity throughout the development of the compliance enforcement program. WECC has unsuccessfully attempted to identify an alternate approach to determine material impact in light of

the aggregation uncertainty. WECC has also sought input on the approach being used by other Regional Entities. It is clear that other Regional Entities are directly using the numeric thresholds and are not attempting to independently evaluate “material impact”. Absent a compelling basis for a different treatment in the Western Interconnection, WECC cannot justify an inconsistent approach to registration. Furthermore, NERC staff has made clear that the numeric thresholds govern the registration criteria.

Unless and until an alternate method of determining material impact, other than the MW and KV criteria, is included in the *NERC Statement of Compliance Registry Criteria* WECC will consider that any entity that meets the MW and KV criteria to have a material impact to the bulk power system and needs to be registered.

Any entity that meets the *NERC Statement of Compliance Registry Criteria* and does not submit registration information to WECC will be registered by WECC. Any entity in disagreement with the WECC registration submittal can appeal the registration with NERC.

### **3.2. DISAGREEMENTS ON REQUESTS FOR VARIATIONS OF REGISTRATION CRITERIA**

If WECC and a candidate Entity are unable to agree on a request for variance from the *NERC Statement of Compliance Registry Criteria* , WECC will follow the strict interpretation of the NERC MW and KV criteria identified in the *NERC Statement of Compliance Registry Criteria*.

### **3.3. AGGREGATION OF LOAD**

For Entities, such as Electric Cooperatives, that take service from multiple service (take out) points, the sum of the Entity’s peak load from all service (take out) points will be used to determine the total system peak “load” of the Entity.

### **3.4. RETAIL AND WHOLESALE ACCESS CUSTOMERS**

All loads must be identified as part of a LSE area and a DP area. Some retail and wholesale aggregators “serve” load in larger, “host” LSE and DP area. The aggregator must ensure full compliance for all LSE requirements for their aggregated load.

### **3.5. DEFINITION OF PEAK LOAD**

Peak Load will be defined as the highest system peak for the Entity during the past five calendar years. The FERC Form 714 is the preferred source of peak load information. The “highest system peak number” could be adjusted if the Entity has had a large increase or decrease in load due such things as the addition or loss of a large customer load.

### **3.6. SYSTEMS AND UNITS OPERATED UNDER 100 KV**

Load Serving Entities and Distribution Providers that are larger than the 25 MW criteria identified in the *NERC Statement of Compliance Registry Criteria* must register regardless of their connected voltage level.

Generator Owners and Generator Operators that own and operate generating units > 20 MVA or a generating plant / facility > 75 MVA criteria identified in the *NERC Statement of Compliance Registry Criteria* must register regardless of their connected voltage level.

### **3.7. RESERVE SHARING GROUPS (RSG)**

Only one entity may register as RSG and that entity becomes the responsible entity for a RSG. The RSG will be responsible for selection of the responsible entity. Any sanctions and penalties for violations by the RSG will be levied on the responsible entity.

WECC will not be involved in the pro-rata sharing of penalties and sanctions between RSG members.

### **3.8. DELEGATION AGREEMENTS FOR DELEGATED TASKS**

When an Registered Entity delegates tasks to another entity, a formal Delegation Agreement must be in place. The Registered Entity retains full responsibility for the performance of all tasks. The Delegation Agreement must include:

- A matrix that shows, at the requirement level (or sub-requirement level if applicable), which entity is responsible for and performing each task.
- A description of how and where documentation will be collectively assembled for a compliance audit. In the case of an on-site compliance audit the supporting documentation would normally need to be assembled in one location. Any variation in this “one location” requirement must be approved by the WECC Compliance Staff.

- Formal Delegation Agreement(s) must be available for review during compliance audits.

### **3.9. FORMAL AGREEMENTS FOR JOINT REGISTRATIONS**

When two Registered Entities elect to enter into a Joint Registration a formal agreement must be in place. The formal agreement must include:

- A matrix that shows, at the requirement level (or sub-requirement level if applicable), which entity is responsible for and performing each requirement. All requirements for the function that is being registered jointly must be addressed in the matrix. The assignment of the requirement in the matrix to a specific entity makes that entity responsible for performance of those requirements and any penalties and sanctions associated with non-compliance.
- A description of how and where documentation will be collectively assembled for a compliance audit. In the case of an on-site compliance audit the supporting documentation would normally need to be assembled in one location. Any variation in this “one location” requirement must be approved by the WECC Compliance Staff.
- Formal agreement(s) must be available for review during compliance audits.

## **4. WECC Registration Dispute Process**

---

Entities have the right to dispute a registration. WECC will coordinate with the organization and attempt to resolve the dispute. WECC desires to resolve all conflicts, if possible, at the regional level. If the dispute cannot be resolved, WECC is obligated to submit the registration that WECC believes is correct to NERC. The Entity has the right to appeal the registration through the NERC registration appeal process.

The general process for Registration disputes will be handled as follows:

1. The Entity notifies WECC Compliance Staff that it disputes the proposed Registration. The notification will include a description of facts that supports the Entity’s position.

2. The WECC Compliance Staff will review the dispute, including the Entity's supporting documentation. The WECC Compliance Staff will use technical support for this evaluation, if needed,
3. The WECC Compliance Staff will make a determination on the registration dispute.
4. If the determination of the WECC Compliance Staff is in agreement with the Entity, the Entity will be notified and the process is complete. WECC will notify NERC of any registration changes.
5. If WECC Compliance Staff does not accept the position of the Entity, the dispute will be forwarded to the WECC Hearing Officer for review.
6. The WECC Hearing Officer will review the disputed registration and make a Proposed determination on the whether registration is required and for which functions. The review will include the finding and supporting documentation of the WECC Compliance Staff, the supporting documentation and studies from the Registered Entity, and any additional input from other involved parties such as the associated RC, BA or TOP.
7. The Proposed registration determination of the WECC Hearing Officer will be submitted to the WECC Compliance Hearing Body for the final registration decision for WECC region.
8. The Entity may appeal the WECC registration with NERC.