**via posting**

**TO:** Interested Industry Parties

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

**RE:** Draft Minutes from September 2, 2025 WEQ BPS Western Interconnection Congestion Management Working Group Meeting

**DATE:** September 8, 2025

**WHOLESALE ELECTRIC QUADRANT**

**Business Practices Subcommittee**

**Western Interconnection Congestion Management Working Group**

**Conference Call**

**September 2, 2025 – 10:00 AM to 4:00 PM Central**

**DRAFT 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. A. Watkins moved, seconded by Mr. Thappetaobula, to adopt the agenda. The motion passed a simple majority vote without opposition.

The participants reviewed the draft minutes from the August 13, 2025 meeting. A minor change was proposed to fix a typographical error. Mr. Thappetaobula moved, seconded by Mr. Lowe, to adopt the revised 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_WICM081325fm.docx>.

1. **Review and Address Any Submitted Informal Feedback on Revised Draft Standards**

Mr. Phillips stated that one set of [informal comments](https://naesb.org/member_login_check.asp?doc=weq_bps_WICM090225w1.docx) was received in response to the request distributed on August 13, 2025 following the previous working group meeting. He asked Mr. Mau to review the feedback provided by BC Hydro.

Mr. Mau asked for confirmation that the WLR process is intended to be used by reliability coordinators to mitigate congestion in real-time and that the intent of WEQ-XXX-1.1 is to support coordination among entities, not the issuance of operating instructions from one reliability coordination to another. Mr. Johnson clarified that while the language does not give reliability coordinators the ability to control another entity’s system, WEQ-XXX-1.1 does require all Western Interconnection reliability coordinators to follow the ECC issued relief obligation and curtailment assignments if one of the reliability coordinators within the interconnection initiates a WLR event. Mr. A. Watkins agreed, stating that neither the concept of the WLR process nor the proposed standards are intended to provide reliability coordinators with control over the operations of another’s system. Mr. Johnson explained that the obligation for all reliability coordinators to follow the ECC instructions is a key requirement for the successful implementation of the WLR process.

Mr. Johnson stated that under the standards, reliability coordinators would have to curtail tagged transactions but that there is built in optionality to provide reliability coordinators with flexibility in the actions taken to achieve the relief obligation assignments for non-tagged transactions. He explained that the proposed WEQ Business Practice Standards establish the methodology for how the ECC will calculate and assign WLR curtailment and relief obligation priorities, ensuring that the instructions issued to the reliability coordinator are neutral and non-discriminatory. Mr. Mau stated that this explanation addresses BC Hydro’s question. Mr. A. Watkins asked if the proposed modification to WEQ-XXX-1.1 needed to still be considered. The participants discussed the language. Mr. Johnson noted that the wording may be duplicative of existing reliability requirements. Mr. Mau stated that based on the discussion, changes to WEQ-XXX-1.1 are not necessary.

The participants reviewed the proposed additions to the introduction and WEQ-XXX-3.1 and agreed to incorporate modifications consistent with the suggestions made by BC Hydro. The WEQ BPS Working Group response to the BC Hydro informal comments can be viewed through the following hyperlink: <https://naesb.org/member_login_check.asp?doc=weq_bps_WICM090225a4.docx>.

1. **Finalize Draft Standards and Vote on Draft Recommendation for WEQ BPS Consideration 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**

Mr. Phillips led a review of the [proposed](https://naesb.org/member_login_check.asp?doc=weq_bps_WICM081325reqcom_a1.docx) draft standards language, and the participants made minor modifications for consistency in the use of defined terms and to correct typographical errors in the standards language. Ms. Chung proposed additional, non-substantive revisions to WEQ-XXX-3.3.5 to improve the readability of the standard and clarify that reliability coordinators may but are not required to reload curtailed transactions if a WLR event ends prior to the conclusion of the hour. The redlined changes made during the meeting can be viewed at the following hyperlink: <https://naesb.org/member_login_check.asp?doc=weq_bps_WICM090225a3.docx>.

Mr. Phillips reviewed a [draft recommendation](https://naesb.org/pdf4/weq_bps_WICM090225w2.docx). He asked if there were any modifications that should be considered or issues that should be discussed before the working group considers a vote to finalize the proposal for WEQ BPS consideration.

Ms. Gary stated that the proposed standards and WLR process would be a significant change in Western Interconnection congestion management practices if implemented. She explained that Portland General Electric has concerns with the WLR concept and is not supportive of the standards. Mr. Phillips if Portland General Electric had identified specific issues that could be discussed by the working group. Ms. Gary responded that Portland General Electric is not supportive of implementing the WLR process due to concerns that the benefits will be minimal and not resolve the existing issues or be a substantive improvement.

Mr. A. Watkins explained that the WLR process uses a flow-based approach similar in concept to other existing congestion management practices, such as parallel flow visualization. He noted that the Eastern Interconnection realized tangible, documented improvements in resolving congestion after incorporating parallel flow visualization as part of its Transmission Loading Relief process. Ms. Gary stated that differences between the Eastern and Western Interconnections could impact the overall effectiveness of the WLR process if implemented. She suggested that WLR curtailments and relief obligations may not provide the same benefits as entities could use the Western Interconnection energy imbalance market to reschedule these transactions. She noted that large portions of the Western Interconnection are not part of an organized market and that these regions would not have an ISO/RTO to serve as the entity responsible for managing the WLR process, measuring its effectiveness, and overseeing the required ECC modeling.

Mr. Phillips explained that while some of these concerns appear to relate to implementation details that will be addressed outside of the NAESB process, such as specific tool functionality enhancements and interface changes, the proposed WEQ Business Practice Standards are intended to provide the overall framework for the WLR process and its implementation. He asked if there are standard changes or additional granularity that could be included to address the issues identified by Portland General Electric. Ms. Gary responded that Portland General Electric does not plan to offer revisions or standard proposals for consideration. She stated that Portland General Electric is opposed to the congestion management approach proposed by the WLR concept and noted that there may be other market participants with similar concerns.

Mr. Phillips stated that issues of this nature have not been raised by other WEQ BPS working group participants, either during meeting discussions or as part of requests for informal comment. Mr. Ashbaker noted that WECC undertook efforts, including discussion during relevant WECC meetings, to help ensure impacted market participants were aware of the request submittal to NAESB and subsequent standards development. He stated that WECC received limited feedback and that none of the responses raised issues with the WLR concept or the proposed draft standards. Mr. A. Watkins noted that while the WLR process is a new type of congestion management approach for the Western Interconnection, the standards reflect the proposal outlined in the ECC Future State White Paper developed by the ECC Expansion Task Force over the course of several years. He explained that the ECC Expansion Task Force included market participant involvement as well as broader outreach to help ensure all identified concerns were addressed and that the resulting proposal had industry support prior to moving forward with the standards request.

Mr. A. Waktins stated that although the WLR process is a different approach for the Western Interconnection that relies on reliability coordinators as the facilitating entity, most of the required functionality already exists within the ECC tool. He explained that the proposed standards provide the framework for how this functionality can be leveraged into a consistent, transparent process for the interconnection as a whole and offered to provide Portland General Electric information to help explain the mechanics of WLR and its implementation. Mr. Lowe stated that PacifiCorp would also be interested in this material. Mr. Phillips suggested that this could be helpful background information to make available to the working group and WEQ BPS. Mr. Lowe and Mr. Ashbaker agreed. Mr. A. Watkins stated that he would coordinate with Mr. Thappetaobula on the request.

Mr. Phillips asked if there were any other revisions, comments, or issues participants wanted to discuss prior to finalizing the draft standards. None were offered.

Mr. A. Watkins moved, seconded by Mr. Thappetaobula, to finalize the [proposed standards](https://naesb.org/member_login_check.asp?doc=weq_bps_WICM090225a2.docx) and [draft recommendation](https://naesb.org/pdf4/weq_bps_WICM090225a1.docx) from the working group and forward to the WEQ BPS for consideration. The motion passed by simple majority support, with one vote in opposition from Ms. Gary.

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

Mr. Phillips stated that as previously discussed, the WEQ BPS scheduled a meeting for Friday, September 12 from 1:00 PM – 3:00 PM Central to consider the proposed standards and vote on a recommendation. If approved, the recommendation will be distributed for a thirty-day formal comment period and included on the agenda for WEQ Executive Committee consideration during its October 22, 2025 meeting. Mr. Phillips explained that while the group has been working towards providing the WEQ Executive Committee with a recommendation for consideration in October, the overall intent is to develop consensus-based standards that have support of industry.

Mr. Phillips asked participants to come prepared to the WEQ BPS meeting to discuss any concerns to help ensure that all issues are identified and addressed to the fullest extent possible prior to holding a vote at the subcommittee level. He encouraged those with feedback to provide written comments, including any language revisions, and noted that if needed, the WEQ BPS can direct the working group to reconvene to develop further modifications.

1. **Adjourn**

The meeting adjourned at 12:16 PM Central on a motion by Ms. Davis, seconded by Mr. Lowe.

1. **Attendance**

| **First Name** | **Last Name** | **Organization** |
| --- | --- | --- |
| Steve | Ashbaker | WECC |
| Rebecca | Berdahl | BPA |
| Tanner | Brier | BPA |
| Alexis | Campbell | Portland General Electric |
| Robin | Chung | BPA |
| Katie | Davis | BPA |
| Tina | Gary | Portland General Electric |
| Emily | Granberry | SPP |
| Shawn | Grant | CAISO |
| Kevin | Johnson | BPA |
| Brian | Lowe | PacifiCorp |
| Paulus | Mau | BC Hydro |
| Joshua | Phillips | SPP |
| Patty | Satkiewicz | PacifiCorp |
| Eric | Shick | APS |
| Raja | Thappetaobula | CAISO |
| Caroline | Trum | NAESB |
| Alex | Watkins | SPP |
| Michael | Watkins | Seattle City Light |