

March 2, 2022

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: **PacifiCorp**
Docket No. ER22-_____
Compliance Filing for Order No. 676-J

Dear Secretary Bose:

The purpose of this letter is to indicate PacifiCorp’s compliance with Order No. 676-J¹ and, in particular, the revised cybersecurity standards contained in Wholesale Electric Quadrant (“WEQ”) of the North American Energy Standards Board (“NAESB”) Version 003.3.

A. Background

In Order No. 676-J, the Federal Energy Regulatory Commission (“Commission”) amended its regulations to incorporate by reference, with certain enumerated exceptions, the latest version (Version 003.3) of the Standards for Business Practices and Communication Protocols for Public Utilities adopted by the WEQ of the NAESB as mandatory enforceable requirements (“NAESB WEQ Standards”). The effective date of Order No. 676-J was August 2, 2021, as stated in the Federal Register dated June 2, 2021.

Order No. 676-J includes newly created standards, as well as modifications to existing standards developed through the NAESB Business Practice Standards development or minor correction processes. The WEQ Version 003.3 Standards include, in their entirety, the WEQ-023 Modeling Business Practice Standards contained in the WEQ Version 003.1 Standards, which address the technical issues affecting Available Transfer Capability (“ATC”) and Available Flowgate Capability (“AFC”) calculation for wholesale electric transmission services, with the addition of certain revisions and corrections. The Commission also revised its regulations to provide that transmission providers must avoid unduly discriminatory and preferential treatment in the calculation of ATC.

The WEQ Version 003.3 Standards also include revisions related to the surety assessment on cybersecurity performed by Sandia National Laboratories designed to strengthen the practices and cybersecurity protections established within the standards. Finally, the Commission approved NAESB’s revised Open Access Same-Time Information System (“OASIS”) suite of standards,²

¹ *Standards for Business Practices and Communication Protocols for Public Utilities*, 175 FERC ¶ 61,139 (May 20, 2021) (“Order No. 676-J”).

² The OASIS suite of standards are the WEQ-001 OASIS Business Practice Standards, the WEQ-002 OASIS Standards and Communication Protocols Business Practice Standards, the WEQ-003 OASIS Data Dictionary Business Practice Standards, and the WEQ-013 OASIS Implementation Guide Business Practice Standards.

including revisions to support new OASIS functionality that will allow for the posting of third party offers of planning redispatch services, as well as providing additional information regarding the curtailment of firm transmission service.

WEQ cybersecurity compliance filings were required to be made nine months after publication of the final rule in the Federal Register, with implementation required no sooner than three months after compliance filings are submitted.³ As noted earlier, publication occurred on June 2, 2021. Therefore, the cybersecurity compliance filings are due on March 2, 2022, and implementation is required by June 2, 2022.

B. Compliance Filing

Attachment Q of PacifiCorp's OATT is entitled "Wholesale Electric Quadrant Standards of the North American Energy Standards Board, and states:

The current versions of the NAESB WEQ Business Practice Standards incorporated by reference into the Commission's regulations as specified in Part 38 of the Commission's regulations (18 CFR Part 38) are incorporated by reference into this tariff.

Therefore, PacifiCorp's OATT complies with the Order No. 676-J tariff revisions by virtue of its currently effective tariff language that incorporates the NAESB WEQ Standards by reference. As a result, there is no tariff change required and no eTariff is being submitted.

Furthermore, PacifiCorp acknowledges its obligation to comply with the Order 676-J authorized, version 003.3 of the NAESB WEQ Standards, unless otherwise granted a waiver. PacifiCorp states that it will be in compliance with the Order No. 676-J NAESB WEQ Standards pertaining to cybersecurity by June 2, 2022.

C. Communications

All communications regarding this filing should be forwarded to the persons listed below, and PacifiCorp requests that they be placed on the service list in this proceeding, if they have not been already.⁴

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³ *Id.*

⁴ To the extent necessary, PacifiCorp respectfully requests waiver of Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.203(b), to permit all of the persons listed to be placed on the official service list for this proceeding.

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D. Effective Date

PacifiCorp respectfully requests an effective date of June 2, 2022, which was listed as the earliest effective date for Order No. 676-J compliance.

E. Service

An electronic copy of this filing is being provided to each of PacifiCorp's OATT customers if such customers have provided PacifiCorp with an e-mail contact address. In addition, a copy of this filing will be posted on PacifiCorp's OASIS.

F. Conclusion

For the foregoing reasons, PacifiCorp respectfully requests that the Commission accept PacifiCorp's compliance filing in satisfaction of Order No. 676-J.

Respectfully submitted,



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