

## Comment Report

**Project Name:** Regional Reliability Standard | VAR-001-5 (WECC Variance)  
Comment Period Start Date: 6/22/2018  
Comment Period End Date: 8/6/2018  
Associated Ballots:

There were 8 sets of responses, including comments from approximately 8 different people from approximately 7 companies representing 4 of the Industry Segments as shown in the table on the following pages.

## Questions

1. Do you agree the proposed standard/variance was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?
2. Does the proposed standard/variance pose an adverse impact to reliability or commerce in a neighboring region or interconnection?
3. Does the proposed standard/variance pose a serious and substantial threat to public health, safety, welfare, or national security?
4. Does the proposed standard/variance pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?
5. Does the proposed regional reliability standard/variance meet at least one of the following criteria?
  - The proposed standard/variance has more specific criteria for the same requirements covered in a continent-wide standard.
  - The proposed standard/variance has requirements that are not included in the corresponding continent-wide reliability standard.
  - The proposed regional difference is necessitated by a physical difference in the bulk power system.

<b>Organization Name</b>	<b>Name</b>	<b>Segment(s)</b>	<b>Region</b>	<b>Group Name</b>	<b>Group Member Name</b>	<b>Group Member Organization</b>	<b>Group Member Segment(s)</b>	<b>Group Member Region</b>
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1. Do you agree the proposed standard/variance was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Glen Farmer - Avista - Avista Corporation - 1,3,5</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Kevin Salsbury - Berkshire Hathaway - NV Energy - 5</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**2. Does the proposed standard/variance pose an adverse impact to reliability or commerce in a neighboring region or interconnection?**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer** No

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1,5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Dennis Sismaet - Northern California Power Agency - 5,6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Marty Hostler - Northern California Power Agency - 5,6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

**3. Does the proposed standard/variance pose a serious and substantial threat to public health, safety, welfare, or national security?**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**Marty Hostler - Northern California Power Agency - 5,6**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dennis Sismaet - Northern California Power Agency - 5,6**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** No

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Glen Farmer - Avista - Avista Corporation - 1,3,5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Kevin Salsbury - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

<b>Response</b>	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

4. Does the proposed standard/variance pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Sismaet - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**5. Does the proposed regional reliability standard/variance meet at least one of the following criteria?**

- The proposed standard/variance has more specific criteria for the same requirements covered in a continent-wide standard.
- The proposed standard/variance has requirements that are not included in the corresponding continent-wide reliability standard.
- The proposed regional difference is necessitated by a physical difference in the bulk power system.

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

- The proposed standard/variance has more specific criteria for the same requirements covered in a continent-wide standard.

Yes the variance has more specific criteria for voltage schedules and generator reference points.

- The proposed standard/variance has requirements that are not included in the corresponding continent-wide reliability standard.

Yes in that the variance doesn't have allowance for exemption criteria and includes transmission operator requirements for submitting data.

Likes 0

Dislikes 0

**Response**

**Marty Hostler - Northern California Power Agency - 5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dennis Sismaet - Northern California Power Agency - 5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kevin Salisbury - Berkshire Hathaway - NV Energy - 5**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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<b>Comment</b>
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Likes 0	
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Dislikes 0	
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<b>Response</b>
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**Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6**

<b>Answer</b>	Yes
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<b>Document Name</b>	
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<b>Comment</b>
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Likes 0	
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Dislikes 0	
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<b>Response</b>
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