

## Comment Report

**Project Name:** Regional Reliability Standard (WECC) | BAL-004-WECC-4  
Comment Period Start Date: 4/10/2024  
Comment Period End Date: 5/28/2024  
Associated Ballots:

There were 11 sets of responses, including comments from approximately 23 different people from approximately 12 companies representing 6 of the Industry Segments as shown in the table on the following pages.

## Questions

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1,3,5	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Portland General Electric Co.	Brooke Jockin	1,3,5,6		Portland General Electric Co.	Brooke Jockin	Portland General Electric	1	WECC
					Dan Mason	Portland General Electric	6	WECC
					Ryan Olson	Portland General Electric	5	WECC
					Adam Menendez	Portland General Electric Co.	3	WECC
Black Hills Corporation	Rachel Schuldt	1,3,5,6		Black Hills Corporation - All Segments	Micah Runner	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Rachel Schuldt	Black Hills Corporation	6	WECC
					Carly Miller	Black Hills Corporation	5	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC

1. Do you agree that the proposed Regional Reliability Standard was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?

Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Lopez - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Dwanique Spiller - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Ben Hammer - Western Area Power Administration - 1,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Brooke Jockin - Portland General Electric Co. - 1,3,5,6, Group Name Portland General Electric Co.**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**2. Does the proposed Regional Reliability Standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?**

**Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name** Black Hills Corporation - All Segments

**Answer** No

**Document Name**

**Comment**

Regarding R1, will WECC require a specific interchange software tool or will the utility have the option to select what best meets their needs?

Likes 0

Dislikes 0

**Response**

**Brooke Jockin - Portland General Electric Co. - 1,3,5,6, Group Name** Portland General Electric Co.

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - WECC**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC**



Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
Likes	0

Dislikes 0

**Response**

**Jessica Lopez - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer** Yes

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

3. Does the proposed Regional Reliability Standard pose a serious and substantial threat to public health, safety, welfare, or national security?

Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Lopez - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Ben Hammer - Western Area Power Administration - 1,6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - WECC**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Brooke Jockin - Portland General Electric Co. - 1,3,5,6, Group Name Portland General Electric Co.**

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

4. Does the proposed Regional Reliability Standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?

**Brooke Jockin - Portland General Electric Co. - 1,3,5,6, Group Name** Portland General Electric Co.

**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name** Black Hills Corporation - All Segments

**Answer** No

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Likes 0

Dislikes 0

**Response**

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**Answer** No

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC**

**Answer** No



<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jessica Lopez - 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>Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Ben Hammer - Western Area Power Administration - 1,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>Interchange Software is defined as “The single electronic confirmation tool identified by the Western Electricity Coordinating Council”. Requirement R1 indicates that the BA must use the Interchange Software as the sole source of data which is dictated by WECC to calculate ATEC. As with any software that could affect reliability, utilities must be given the option to validate the data quality, availability, and security. R1 provides no recourse if an entity has legitimate reasons for not procuring the software which can include security, data quality, availability, or financial limitations.</p> <p>It is unclear the justification for the changes in R1.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>R1 and the definition of “Interchange software”. WECC states that it will be a “single electronic confirmation tool” and the BA “shall use the Interchange Software as the sole source of data”.</p>	

What tool? OATI? How can it be dictated that a third party public traded software company must be used? A Utility should have a choice of software. What if we moved from using an OATI product and that is the WECC preferred?

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**5. Does the proposed Regional Reliability Standard meet at least one of the following criteria?**

- The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.
- The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.
- The proposed regional difference is necessitated by a physical difference in the Bulk Power System.

**Casey Perry - PNM Resources - Public Service Company of New Mexico - 1,3 - WECC**

**Answer** Yes

**Document Name**

**Comment**

PNM has assessed that this standard meets the third criteria bullet point "The proposed regional difference is necessitated by a physical difference in the Bulk Power System." The top two options are N/A as there is no continent-wide standard for BAL-004.

Likes 0

Dislikes 0

**Response**

**Joanne Anderson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jessica Lopez - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ben Hammer - Western Area Power Administration - 1,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name** BC Hydro

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name** Black Hills Corporation - All Segments

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Brooke Jockin - Portland General Electric Co. - 1,3,5,6, Group Name** Portland General Electric Co.

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