



Attachment R5
WECC-0147 BAL-004-WECC-4
Automatic Time Error Correction (ATEC)
Response to Comments NERC Posting 1
April 10 through May 28, 2024

NERC Posting 1

Posting

This project was posted for comment at NERC from April 10 through May 28, 2024.

NERC distributed notice for the posting on April 10, 2024. NERC posed the following 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 Procedures?
- 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?
 - a. The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.
 - b. The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.
 - c. The proposed regional difference is necessitated by a physical difference in the Bulk Power System.

NERC reported receiving “11 sets of responses, including comments from approximately 23 different people from approximately 12 companies representing 6 of the Industry Segments.”¹

Location of Comments

Comments can be viewed in their original format on the WECC-0147 project [Home Page](#), at the “Submit and Review Comments” accordion.²

¹ See WECC-0147 Posting 1 BAL-004-WECC-4 – ATEC – Posting 1 – Response to Comments – [NERC 45-Day](#), on the WECC-0147 project Home Page, at the Submit and Review Comments accordion.

² Loc. Cit.

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Changes in Response to Comment

The WECC-0147 BAL-004-WECC-4, Automatic Time Error Correction (ATEC) Drafting Team (DT) appreciates all those that actively engaged in the standards development process. After reviewing and considering all comments, the DT opted to make no further Substantive changes to the project.

There are two tables for each question addressed. The first table is a summary of the drafting team's responses for that question. The second table includes comments in their original format as provided to WECC by NERC.

Minority View

The minority position posits that requiring all entities to use the Interchange Software is overly restrictive. The DT does not concur, noting that uniformity enhances the ATEC outcome.

Proposed Effective Date

The first day of the second quarter following regulatory approval.

Justification

As proposed, many of the required tasks are already being performed in the same or similar manner as those currently approved. The new or modified tasks impose a minimal burden achievable in the time window between regulatory approval and the proposed Effective Date.

Impact on Other Documents

None.

This project: 1) adds a Standard-specific definition, applicable only to this Regional Reliability Standard (RRS), and 2) clarifies that when used, the term "ATEC" is as defined in the WECC Regional Definitions section of the NERC Glossary of Terms Used in Reliability Standards (Glossary).

Contacts and Appeals

If you feel your comment has been omitted or overlooked, please contact the NERC Standards Department. For questions at the regional level, please contact [W. Shannon Black](#), WECC Consultant, at (503) 307-5782. In addition, there is a WECC Reliability Standards appeals process.



Summary of Responses

Question 1

- 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 Procedures?

All respondents agreed the project was developed using a fair and open process.

Open and Transparent Process

This project is the result of approximately 21 publicly noticed and convened meetings during which the public was invited to comment on the project.

On December 7, 2021, the WECC Standards Committee (WSC) reviewed and approved the WECC-0147 BAL-004-WECC-4, Automatic Time Error Correction (ATEC) Standard Authorization Request (SAR), at the duly noticed public meeting.

Per the WSC's request, WECC solicited³ and the WSC approved⁴ a standards drafting team (DT). This project was posted for public comment on four occasions at WECC,⁵ prior to a single 45-day posting at NERC,⁶ resulting from 16 publicly noticed drafting team meetings. The drafting team meetings were augmented by a publicly noticed WECC Standards Briefing⁷, held prior to opening a WECC ballot.⁸

(For dates, see the [Project Roadmap](#) located on this project's Home Page at the NERC Filing accordion.)⁹

³ January 26, 2022, and February 9, 2022.

⁴ March 22, 2022.

⁵ Posting 1 (August 4 through September 21, 2022), Posting 2 (December 12, 2022, through January 11, 2023), Posting 3 (April 6 through May 8, 2023), and Posting 4 (June 21 through July 21, 2023).

⁶ April 10 through May 28, 2024.

⁷ September 13, 2023.

⁸ Open: September 14, 2023; Closed: September 29, 2023.

⁹ WECC-0147 Project Page: <https://www.wecc.org/Standards/pages/wecc-0147.aspx>



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After reaching a 100% quorum: 1) this project's publicly solicited Ballot Pool¹⁰ approved this project with a 100% affirmative ballot,¹¹ 2) the WSC publicly vetted its decision to approve the Procedural machinations of this project¹², 3) and the WECC Board of Directors publicly approved the project for further regulatory review at NERC/FERC.¹³

All of these forums are public. Public comment was invited in every forum.

¹⁰ August 21 through September 6, 2023.

¹¹ September 14 through September 29, 2023, <https://www.wecc.org/Reliability/WECC-0147%20BAL-004-WECC-4%20-%20ATEC%20-%20Final%20Ballot.pdf>

¹² December 5, 2023.

¹³ March 13, 2024.



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Question 1 - Original Format

Do you agree that the proposed regional Reliability Standard was developed in a fair and open	
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	



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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	



WECC-0147 BAL-004-WECC-4 Response to Comments NERC Posting 1

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	



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Comment	
Likes 0	
Dislikes 0	
Response	

Draft 6

Summary of Responses

Question 2

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

	<p>Question 2 asks whether the proposed standard poses “an adverse impact on reliability or commerce in a neighboring region or interconnection.” Of the 11 respondents, only Berkshire Hathway – NV Energy (NV) said “yes.”</p> <p>At the threshold, it is unclear how a Regional Reliability Standard used only in the Western Interconnection could have any adverse impact on commerce in a neighboring region or interconnection. Whereas NV did not provide the DT with any issues to address, the DT made no changes.</p> <p>Although outside the scope of the question, Black Hills asked whether WECC would require use of the Interchange Software. The DT responded, “yes.” See the team’s response to Black Hills for further detail.</p>

DRAFT

WECC-0147 BAL-004-WECC-4 Response to Comments NERC Posting 1

Question 2 - Original Format

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	
WECC will designate the software; the applicable entities are to use the software.	
In response to Black Hills' query regarding the Interchange Software, R1 references the standard-only definition of the Interchange Software. Per the standard-only definition, WECC will identify the "single...tool... <i>to be used by all</i> Balancing Authorities throughout the Western Interconnection (WI)." (Emphasis added.) As is customary, the "how to" process by which the software will be identified is not in the standard.	
The DT also points Black Hills to Requirement R1: "Each Balancing Authority shall use the Interchange Software as the sole source of data to calculate its ATEC."	
ATEC lacks precision unless each entity uses the same software.	
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	



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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
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	No
Document Name	
Comment	
Likes	0



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Dislikes 0	
Response	
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	



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Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy – 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<p>Although NV Energy opines that the proposed standard poses “an adverse impact to reliability or commerce in a neighboring region or interconnection,” NV does not specify any concerns here nor did NV raise any concerns during the estimated 21 public meetings during which the standard was developed, nor the mandatory Standards Briefing prior to balloting.</p> <p>The record shows that NV did not enter into the Ballot Pool nor engage the WSC or WECC Board of Directors regarding this project.</p> <p>As such, the NV has not provided the DT with anything to address.</p>	



Summary of Responses

Question 3

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

<p>Question 3 asks whether the proposed standard poses “a serious and substantial threat to public health, safety, welfare, or national security.”</p>	
<p>Of the 11 respondents, only Berkshire Hathway – NV Energy (NV) said “yes.” Whereas NV did not provide the DT with any issues to address, the DT made no changes.</p>	

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Question 3 - Original Format

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



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Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
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	
Response	



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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	



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Likes 0	
Dislikes 0	
Response	
<p>Although NV Energy opines that the proposed standard poses “a serious and substantial threat to public health, safety, welfare, or national security,” NV does not specify any concerns here nor did NV raise any concerns during the estimated 21 public meetings during which the standard was developed, nor the mandatory Standards Briefing prior to balloting.</p> <p>The record shows that NV did not enter into the Ballot Pool nor engage the WSC or WECC Board of Directors regarding this project.</p> <p>As such, NV does not provide the DT with anything to address.</p>	



Summary of Responses

Question 4

- 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?

<p>Question 4 asks whether the proposed standard poses “a serious and substantial burden on competitive markets” within WECC.</p> <p>Of the 11 respondents, Western Area Power Administration (Western), Tucson Electric Power (Tucson), and Berkshire Hathaway – NV Energy (NV) posit that the standard poses a “serious and substantial burden on competitive markets” within WECC.</p> <p>1) Lack of Engagement</p> <p>A review of the record indicated that none of the three entities engaged in the standard development process, even though:</p> <ul style="list-style-type: none"> • The project was posted for Substantive comment on four occasions, • Development of the project spanned 11 months, • The entities could have participated during any of the 21 publicly held and noticed meetings, • Entities were publicly invited via the Standards Email List (SEL) to join a WECC Ballot Pool wherein they could cast a “no” vote with accompanying narrative for the DT to address prior to reaching NERC. <p>(Please see Question 1 for further detail.)</p> <p>2) FERC Order 672</p> <p>None of three respondents participated in the ERO’s Reliability Standard development process.</p> <p>The DT notes FERC Order 672, P334:</p> <p>Per FERC Order 672, “in considering whether a proposed Reliability Standard meets the legal standard of review, we will entertain comments about whether the ERO implemented its Commission-approved Reliability Standard development process for the development of the particular proposed Reliability Standard in a proper manner, especially whether the process was open and fair. <i>However, we caution that we will not be sympathetic to arguments by interested parties that choose, for whatever reason, not to participate in the ERO’s Reliability Standard</i></p>	



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development process if it is conducted in good faith in accordance with the procedures approved by the Commission. (Emphasis added.) Order No. 672 at P 334

3) Substantive Queries Out of Time

Western

Western states, as “with any software that could affect reliability, utilities must be given the option to validate the data quality, availability, and security.” Noting that Western did not engage in the standards development process, the DT offers the following.

As to validation...

The standard-specific definition in conjunction with Requirement R1 does not prohibit the applicable entity from using any other *secondary* software it chooses to “validate the data quality” (Western) for that entity. Validation by definition is a secondary task; whereas the Interchange Software is designed to be the “primary means for confirmation and creation of the final record primary”¹⁴ for calculating ATEC.

The proposed definition and Requirement R1 were first introduced in this project during Posting 1 in August 2022, with refinements being added in Posting 2, and Posting 3, receiving no further comments or changes in Posting 4.

In Posting 1, the DT stated, “The definition is proposed to add clarity and unanimity as to which software product is to be used to calculate ATEC.” (Emphasis added.) As for the Requirement, its purpose is narrowly limited “to calculate...ATEC.” (Emphasis added.) This is buttressed in the proposed rationale section for R1 stating, “The goal of Requirement R1 is to ensure a consistent ATEC calculation...[b]ecause...allowing inconsistent calculation of ATEC will cause imbalance in accumulations.”

Per the 100% affirmative ballot, the WECC Ballot Pool charged WECC with selecting the appropriate product on behalf of those using the WECC ATEC calculation. As is customary, the standard does not specify “how” WECC will complete that task.

As to availability and security...

¹⁴ Standard-specific definition.



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Western raises concerns regarding “availability, and security.”

As with any standard, the document itself is not designed to list every eventuality (availability and/or security), nor is it designed to explain “how” the standard should be implemented, or what would constitute compliance/non-compliance with the standard. Rather, the standard is designed to require the end result – consistency in calculating ATEC. It achieves that goal by requiring all Balancing Authorities to use the Interchange Software to calculate ATEC.

When considering availability, the standard-specific definition includes the phrase, “during all periods when the Interchange Software is available.” If the software is not available, by default and definition, it cannot be used.

For example, if the software “fails to function as designed,”¹⁵ that factor could deem the software unavailable. If the software suffers from “catastrophic...failure,” that could deem the software unavailable. If the software is not accessible due to “catastrophic hardware...failure,” the software might be deemed unavailable. And most certainly, if the software fell prey to a security breach, a reasonable interpretation of such an event could be that the software “fails to function as designed.” These examples are offered for illustration only. Ultimately, the enforcement entity would decide the matter.

To reiterate, as with any standard, the standard itself is not intended to list every possible contingency (e.g., system malfunctions and/or software security issues), explain how the applicable entity should achieve the desired reliability goal, or mandate what constitutes compliance or non-compliance. Rather the standard is designed to elicit a consistent reliability goal – that of calculating a consistent ATEC.

Tucson

Tucson asks which tool is the Interchange Software tool. Noting that Tucson did not engage in the standards development process, the DT offers the following.

¹⁵ Loc. Cit.



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The standard does not contain a statement as to which software *product* will be used; rather, it simply states WECC will “identify” the tool. As is customary, the identification process (“how to”) by which WECC will make that determination is not contained in the standard.

To Tucson’s hypothetical, if OATI (as currently used in the Interconnection) were no longer offering services needed to fulfill the standard’s requirements, WECC would still be charged with identifying the “single electronic confirmation tool...used by all Balancing Authorities...as the primary means for confirmation and creation of the final [ATEC] record.” (Definition)

NV

As to NV Energy, that entity contends that the standard poses “a serious and substantial burden on competitive markets” within WECC. Noting that NV did not engage in the standards development process, nor specify any issue for the DT to address, the DT opted to make no further changes.

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Question 4 - Original Format

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
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



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Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
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	



WECC-0147 BAL-004-WECC-4 Response to Comments NERC Posting 1

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	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
<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
Response	
See above response to Black Hills. ATEC lacks precision unless each entity uses the same software..	
Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC	
Answer	Yes
Document Name	
Comment	
<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>	



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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	
See above. ATEC lacks precision unless each entity uses the same software.	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
See above.	

Summary of Responses

Question 5

- 5) Does the proposed Regional Reliability Standard meet at least one of the following criteria?
- a. The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.
 - b. The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.
 - c. The proposed regional difference is necessitated by a physical difference in the Bulk Power System.

All 11 respondents agreed that the standard met the above Question #5 criteria.	
The DT thanks all of those that devoted their time, talents, and attention to the standard development process.	

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Question 5 - Original Format

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	
The DT thanks PNM for its time, talents, and continued involvement in the standards development process.	
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	



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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	



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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.	
Answer	Yes
Document Name	
Comment	



WECC-0147 BAL-004-WECC-4 Response to Comments NERC Posting 1

Likes 0	
Dislikes 0	
Response	

Draft 6