**Unofficial Comment Form**Regional Reliability Standard | FAC-501-WECC-4

**DO NOT** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Regional Reliability Standard, FAC-501-WECC-4 – Transmission Maintenance** by **8 p.m. Eastern, Friday, September 29, 2023.**

Documents and information about this project are available on the [WECC Regional Reliability Standards](https://www.wecc.org/Standards/Pages/Default.aspx) page. If you have questions, contact Reliability Standards Analyst, Kimberlin Harris (via email) or at (404) 446-9794.

**Background Information**

The Western Electricity Coordinating Council (WECC) has requested that NERC post proposed Regional Reliability Standard FAC-501-WECC-4 – Transmission Maintenance and the associated WECC-0149 [Table Revision Process](http://departments.internal.nerc.com/StandardsInfo/RegionPost/FAC-501-WECC-4/WECC-0149%20FAC-501-WECC-3%20Trans%20Maint%20and%20Revision%20Process%20-%20Attachment%20C-2%20-%20Table%20Rev%20Process.docx?Web=1) for public comment. The proposed regional standard modifies the currently effective regional standard FAC-501-WECC-2 as follows:

* Adds a Background and a Facilities section; Conforming the language throughout to incorporate the WECC-0149 Table Revision Process.
* Updating the Compliance section to accept NERC’s newest template language.
* Deleting FAC-501-WECC-2, Attachment B, Path Names Identified for Transmission Maintenance and Inspection, and migrating that list into the WECC-0149, Table Revision Process, Attachment A, Major WECC Transfer Paths in the Bulk Electric System.
* Deleting FAC-501-WECC-2, Attachment C, Revision Process, and replacement of that process with the WECC-0149 Table Revision Process.
* Creates a process for modifying the content of the WECC-0149 Table Revision Process, Attachment A, Major WECC Transfer Paths in the Bulk Electric System.

The WECC Board of Directors approved the proposed regional standard FAC-501-WECC-4 and WECC-0149 Table Revision Process on June 14, 2023.

**NERC Criteria for Developing or Modifying a Regional Reliability Standard**

Each regional difference (i.e., Regional Reliability Standard or Variance) shall be: (1) is more stringent than the continent-wide Reliability Standard, including a regional difference that addresses matters that the continent-wide reliability standard does not; or (2) necessitated by a physical difference in the bulk power system. Regional Reliability Standards and Variances shall provide for as much uniformity as possible with Reliability Standards across the interconnected bulk power system of the North American continent. Regional Reliability Standards and Variances, when approved by FERC and applicable authorities in Mexico and Canada, shall be made part of the body of NERC Reliability Standards and shall be enforced upon all applicable Bulk Power System owners, operators, and users within the applicable area, regardless of membership in the region.

The approval process for a proposed Regional Reliability Standard or Variance, or the retirement of an existing standard or Variance, requires NERC to publicly notice and request comment. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

**Unfair or Closed Process –** The Regional Reliability Standard was not developed in a fair and open process that provided an opportunity for all interested parties to participate. Although a NERC-approved Regional Reliability Standards development procedure shall be presumed to be fair and open, objections could be raised regarding the implementation of the procedure.

**Adverse Reliability or Commercial Impact on Other Interconnections –** The Regional Reliability Standard would have a significant adverse impact on reliability or commerce in other interconnections.

**Deficient Standard –** The Regional Reliability Standard fails to provide a level of reliability of the Bulk Power System such that the Regional Reliability Standard would be likely to cause a serious and substantial threat to public health, safety, welfare, or national security.

**Adverse Impact on Competitive Markets within the Interconnection –** The Regional Reliability Standard would create a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability.

**Questions**

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

[ ] Yes

[ ] No

Comments:

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

[ ] Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments:

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

[ ] Yes

[ ] No

Comments:

1. 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.

[ ]  Yes

[ ]  No

Comments: