**Unofficial Comment Form**Regional Reliability Standard | IRO-006-WECC-3

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on Regional Reliability Standard **IRO-006-WECC-3 Qualified Path Unscheduled Flow (USF) Relief.** The form must be submitted by **8 p.m. Eastern, Monday, January 28, 2019.** Documents and information about this project are available on the [WECC’s Standards Under Development](https://www.wecc.biz/Standards/Pages/Default.aspx)page. If you have questions, contact Standards Development Manager, Chris Larson (via email) or at (404) 446-2564.

**Background Information**

The Western Electricity Coordinating Council (WECC) conducted a mandatory five-year review of Regional Reliability Standard IRO-006-WECC-2.

The WECC drafting team made the following changes:

* Clarified the purpose statement;
* Replaced defined term “Qualified Transfer Path” with “Qualified Path” as included in the Western Interconnection Unscheduled Flow Mitigation Plan, approved by the Federal Energy Regulatory Commission;
* Retired the following terms from the NERC Glossary of Terms Used in Reliability Standards because they are either no longer accurate or are no longer used in any standards:
	1. Qualified Transfer Path,
	2. Contributing Schedule,
	3. Qualified Controllable Device,
	4. Relief Requirement,
	5. Transfer Distribution Factor, and
	6. Qualified Transfer Path Curtailment Event.
* Conformed the standard to current drafting conventions and template.

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

Regional Reliability Standard shall be: (1) a regional reliability standard that is more stringent than the continent-wide reliability standard, including a regional standard that addresses matters that the continent-wide reliability standard does not; or (2) a regional reliability standard that is necessitated by a physical difference in the bulk power system. Regional reliability standards 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, 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 regional reliability standard requires NERC to publicly notice and request comment on the proposed standard. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

**Open** — Regional reliability standards shall provide that any person or entity that is directly and materially affected by the reliability of the bulk power system within the regional entity shall be able to participate in the development and approval of reliability standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the regional entity, a regional entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

**Inclusive** — Regional reliability standards shall provide that any person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process, if adversely affected.

**Balanced** — Regional reliability standards shall have a balance of interests and shall not be dominated by any two-interest categories and no single-interest category shall be able to defeat a matter.

**Due Process** — Regional reliability standards shall provide for reasonable notice and opportunity for public comment. At a minimum, the standard shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent** — All actions material to the development of regional reliability standards shall be transparent. All standards development meetings shall be open and publicly noticed on the regional entity’s Web site.

Review the revised Regional Reliability Standard and answer the following questions.

1. Do you agree the development of the Regional Reliability Standard met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of the Regional Reliability Standard met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of the Regional Reliability Standard met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of the Regional Reliability Standard met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the development of the Regional Reliability Standard met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:

[ ]  Yes

[ ]  No

Comments: