**Unofficial Comment Form for Regional Reliability Standard**

**IRO-006-WECC-2**

**Qualified Transfer Path Unscheduled Flow (USF) Relief**

Please **DO NOT** use this form. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=7d28350b1d73414caeadc5bc8d3a14d5) located at the link below to submit comments on the Regional Reliability Standard **IRO-006-WECC-2 –Qualified Transfer Path Unscheduled Flow (USF) Relief** comments must be submitted by **8 p.m. Eastern on November 16, 2012.** If you have questions please contact Howard Gugel at howard.gugel@nerc.net or Barb Nutter at barbara.nutter@nerc.net.

[Regional Reliability Standards Under Development Page](http://www.nerc.com/filez/regional_standards/regional_reliability_standards_under_development.html)

**Background Information**

A 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.

**IRO-006-WECC-1** is being revised to align IRO-006-WECC-2 with the changes made to the WECC Unscheduled Flow Reduction Guideline (UFRG), VSLs were modified to eliminate ambiguity and to modify the currently approved term “Relief Requirement”.

Each **Western Electricity Coordinating Council (WECC)** Regional Reliability Standard shall enable or support one or more of the NERC reliability principles, thereby ensuring that each standard serves a purpose in support of the reliability of the regional bulk electric system. Each of those standards shall also be consistent with all of the NERC reliability principles, thereby ensuring that no standard undermines reliability through an unintended consequence. The NERC reliability principles supported by this standard are the following:

**• Reliability Principle 1 -** Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.

• **Reliability Principle 3 -** Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.

The proposed SPP Regional Reliability Standard is not inconsistent with, or less stringent than established NERC Reliability Standards. Once approved by the appropriate authorities, the SPP Regional Reliability Standard obligates WECC to monitor and enforce compliance, apply sanctions, if any, consistent with any regional agreements and the NERC rules.

**R1.** Each Reliability Coordinator shall approve or deny a request within five minutes of receiving the request for unscheduled flow transmission relief from the Transmission Operator of a Qualified Transfer Path that will result in the calculation of a Relief Requirement.

**R2.** Each Balancing Authority shall perform any combination of the following actions meeting the Relief Requirement upon receiving a request for relief as described in Requirement R1.

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):

**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.

1. **Do you agree the proposed standard is being developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?**

**[ ]** Yes

**[ ]** No

Comments:

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

**[ ]** Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments:

1. **Does the proposed 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 standard has more specific criteria for the same requirements covered in a continent-wide standard**
* **The proposed standard 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**

**[ ]** Yes

**[ ]** No

Comments: