**Unofficial Comment Form**Regional Reliability Standard WECC-0101

**DO NOT** use this form for submitting comments. Use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=d13c7b1752a5419f946c1c0093dfeba2) to submit comments on Regional Reliability Standards **MOD-026-2** and **MOD-027-2 – Modeling, Data, and Analysis (WECC Variance)**. Comments must be submitted by **8 p.m. Eastern, Monday, December 28, 2015.**

The [Regional Reliability Standards Under Development](http://www.nerc.com/pa/Stand/Pages/RegionalReliabilityStandardsUnderDevelopment.aspx)page contains documents and information about this project. If you have questions, contact Mat Bunch via email.

**Background Information**

Any variance from a NERC reliability standard requirement that is proposed to apply to responsible entities within a regional entity organized on an interconnection-wide basis shall be considered an

Interconnection-wide Variance and shall be developed through that regional entity’s NERC-approved regional reliability standards development procedure. While an interconnection-wide variance may be developed through the associated Regional Entity standards development process, regional entities are encouraged to work collaboratively with existing continent-wide drafting team to reduce potential conflicts between the two efforts. An Interconnection-wide Variance from a NERC reliability standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC reliability standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC reliability standard that is developed, in accordance with a standards development procedure approved by NERC, by a regional entity organized on an interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

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.

* MOD-026-2, Verification of Models and Data for Generator Excitation Control System or Plant Volt/VAR Control Functions.
* MOD-027-2 Verification of Models and Data for Turbine/Governor and Load Control or Active Power/Frequency Controls Functions.

Without these variances, an entity can use flawed generator modeling practices and still be in alignment with the requirements of MOD-026-1 and MOD-027-1, leaving questions of credibility of certain generator models. As a result, entities could plan their systems based on models whose veracity has never been determined. Use of these acceptable-yet-flawed practices creates inaccuracies in the WECC model databases. As a result, reliability is at risk without the variance.

**Questions**

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

[ ] Yes

[ ] No

Comments:

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

[ ] Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments:

1. **Does the proposed standard/variance 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/variance meet at least one of the following criteria?**
* **The proposed standard/variance has more specific criteria for the same requirements covered in a continent-wide standard.**
* **The proposed standard/variance 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: