**Unofficial Comment Form**Western Electricity Coordinating Counsel

Reliability Standards Development Procedure

**DO NOT** use this form for submitting comments. Use the [Standards Balloting and Commenting System](https://sbs.nerc.net/) to submit comments on the **Western Electricity Coordinating Counsel Reliability Standards Procedure (WECC RSDP)** by **8 p.m. Eastern, Friday, April 2, 2021.**

If you have questions, contact Kimberlin Harris (via email) or at (404) 446-9794.

**Summary**

Changes to the WECC RSDP include:

* **Introduction**
	+ Footnote 1 was added to adopt a definition for Regional Entity.
* **Definitions**
	+ A definition for Affirmative Fraction Majority is proposed.
	+ The definition for Regional Reliability Standard was modified to include Regional Variances.
* **WECC Standards Committee (WSC)**
	+ Verbiage was updated to match the WSC Charter.
* **Step 2 Complete Standard Authorization Request (SAR) and Present to the WSC**
	+ “the SAR” was added for clarity, paragraph 2.
	+ Because a SAR can be refiled without prejudice, there is no need to preserve appellate rights up to the WECC Board of Directors. Therefore, the last sentence of the section was deleted.
* **Step 3 Convene a Drafting Team (DT)**
	+ Substance of WSC guideline was adopted.
* **Step 4 Begin Drafting Phase and Submit Draft to WSC**
	+ Syntax was changed for clarity.
	+ A change was added allowing flexibility in WECC CRT structure. This is done to differentiate the structure from that of a standard, particularly as NERC moves to extract guidance narrative from the body of its standards.
* **Step 5 Post for Comment**
	+ Syntax was changed for clarity.
* **Step 6 Respond to Comments**
	+ At “Treatment of Substantive Changes,” syntax was changed for clarity.
	+ “Vote” was changed to “poll”.
	+ At “Treatment of Non-substantive Changes,” staff is empowered to make non-substantive changes without convening a WSC meeting.
	+ At “WECC Regional Criteria,” staff is empowered to make non-substantive changes without convening a WSC meeting.
* **Step 7 Submit Proposed Draft to the WSC with a Request for Ballot**
	+ No change.
* **Step 8 Convene a Standards Briefing**
	+ The notice period was shortened to seven days. Historically, Standards Briefings are low-profile with no controversy. Expedites administration.
* **Step 9 Form the Ballot Pool and Ballot the Standard**
	+ Additional decision-making authority is provided to Director of Standards (DOS) and the WSC. The WSC is proficient to read a description and make the call without convening a Board meeting.
	+ Clarification was added.
	+ The notice period was shortened from 60 to 45 days to expedite administration.
	+ The phrase “good cause” was deleted because it is ambiguous.
	+ A new section “Treatment of Abstentions and Explanatory Narrative during Ballot” was added to incorporate the WSC guideline.
	+ A large portion of this section was redrafted for clarity.
* **Step 10 Initiate the Appeals Process — If Needed**
	+ WSC is permitted to approve forwarding a project immediately before providing it to the Board for approval.
* **Step 11 Obtain Board Approval**
	+ Remand is directed to the WSC as opposed to the DT. The WSC can then decide the next steps.
* **Step 12 Submit for NERC and FERC Approval and Implementation**
	+ This section can be deleted as superfluous to the WECC Delegation Agreement. It can be replaced by a simple sentence to that affect. If adopted, “Steps” will have to be renumbered.
* **Step 13 Retire a CRT**
	+ Since the WSC is a procedural oversight body and not SMEs on reliability, review by a DT is preferred.
	+ The 14-day notice requirement can be eliminated if the above language is adopted. Notice will be provided via the DT announcements.
* **Step 14 Submit a Request for Interpretation**
	+ Capitalization of Request for Interpretation.
	+ Syntax changes were made for clarity.
* **Supporting Processes**
	+ No change.
* **Maintenance of RRSs and CRTs**
	+ Language was added for clarification.
	+ The “how to” clause was removed.

**Background Information**

Each NERC Regional Entity (RE) has an RSDP to define the steps in that region’s process for developing, revising, reaffirming, and withdrawing its regional reliability standards. Regional reliability standards must provide as much uniformity as possible with NERC’s continent-wide reliability standards. When regional reliability standards are approved by FERC and applicable authorities in Mexico and Canada, these standards are added to the body of NERC reliability standards that are enforced upon all applicable bulk power system owners, operators, and users within the applicable area, regardless of membership in the region.

Before approving an RE’s RSDP, NERC must post the procedure for comment. Evaluation of the proposed procedure includes identifying whether a proposed regional RSDP meets the criteria listed below. Each regional RSDP must meet all of the following criteria:

**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 website.

Review the revised Regional RSDP and answer the following questions.

1. Do you agree the revised WECC RSDPcontinues to meet the “Open” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised WECC RSDP continues to meet the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised WECC RSDP continues to meet the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised WECC RSDP continues to meet the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised WECC RSDP continues to meet the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments: