

WECC Comments on Proposed Amendments to NERC ROP Section 300

WECC generally supports the proposed approach of the response to the FERC directive; however, WECC offers the following comments on the proposed changes and additions.

Section 309

No comments on proposed revisions

Section 321

- ROP 321 should not apply to any regional standard or current FERC-approved regional standard development processes.
- For this rule to apply, the actions taken by the drafting team must be limited to actions to address a specific directive or group of directives. This may mean that existing projects would need to be modified and split apart, and new projects may need to be made into two separate projects.
- Section 321.1 – The second paragraph states that a memorandum describing the issues surrounding the regulatory directive shall be prepared if the BOT finds that a ballot pool has failed to approve a proposed standard that addresses a specific matter. WECC suggests that the information describing the issues surrounding the regulatory directive that would be included in the memo and distributed during the re-ballot should be made available during the initial ballot.
- Section 321.2.2 – The word “substantive” is subjective. Who determines whether a comment is substantive. The word “substantive” should be deleted or replaced with a more definitive description of comments that would cause negative votes to be counted and that would cause negative votes to be excluded. ANSI principles require comments to be related to the standard being balloted.
- Section 321.3 – If a re-ballot achieves at least an affirmative two-thirds majority vote, but there are negative votes with comment, would a re-circulation ballot be required, as is currently the case with the NERC process?
- Section 321.4.4 – This section seems to indicate that a re-balloted standard that does not receive at least an affirmative sixty-percent majority vote, or fails to achieve a quorum, would not be forwarded to the BOT or to FERC, but rather that NERC would file a report with the applicable ERO governmental authority regarding the circumstances of the matter. WECC wants to be certain that this is what is intended. While WECC supports this as the process, it does not seem that this last section results in NERC meeting the initial directive. This could still result in a standard not being forwarded when directed by an applicable ERO governmental authority.