**Unofficial Comment Form**Western Electricity Coordinating Council
PRC-006-5 Regional Variance

**DO NOT** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the Regional Reliability Standard **PRC-006-5 - Automatic Underfrequency Load Shedding Variance** by **8 p.m. Eastern, Monday, July 6, 2020**.

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 Nasheema Santos (via email) or at 404-446-2564.

**Background Information**

The Western Electricity Coordinating Council (WECC) conducted a mandatory five-year review of the PRC-006-4 Regional Variance (RV). The following changes were made to PRC-006-4. The following changes were made:

1. updated the preamble of the Regional Variance (RV) to indicate Requirements R14 and R15 of the underlying standard do not apply to entities in the Western Interconnection,
2. clarifies that Planning Coordinator (PC) as used in the RV is specific to those PCs providing PC service(s) to entities within the Western Interconnection, regardless of where the PC is located, and
3. clarifies syntax, adopts NERC’s most current drafting conventions, and updates the Violation Risk Factor table.

The proposed Variance does not change any of the continent-wide Requirements. The WECC Board of Directors adopted the proposed RV on March 11, 2020.

The standard was posted for comment from September 23 – October 23, 2019 and the comments received can be viewed [here](https://www.wecc.org/Standards/Pages/Default.aspx).

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.

NERC is publicly noticing and requesting comment on the proposed WECC Variance. Comments shall be permitted only on the following criteria (technical aspects of the Variance are vetted through the regional standards development process):

**Unfair or Closed Process –** The Variance 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 Variance would have a significant adverse impact on reliability or commerce in other interconnections.

**Deficient Standard –** The Variance fails to provide a level of reliability of the bulk power system such that the Variance 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 Variance would create a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability.

**Questions**

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

[ ] Yes

[ ] No

Comments:

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

[ ] Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments:

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