

November 9, 2020

**VIA ELECTRONIC FILING**

Michael Law  
President and Chief Executive Officer  
Alberta Electric System Operator  
2500, 330 - 5 Avenue SW  
Calgary, Alberta  
T2P 0L4

RE: *North American Electric Reliability Corporation*

Dear Mr. Law:

The North American Electric Reliability Corporation (“NERC”) hereby submits Notice of Filing of the North American Electric Reliability Corporation of Proposed Reliability Standard PRC-006-5. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

NERC understands the AESO may adopt the proposed reliability standards subject to Alberta legislation, principally as established in the *Transmission Regulation* (“the T Reg.”). Briefly, it is NERC’s understanding that the T Reg. requires the following with regard to the adoption in Alberta of a NERC Reliability Standard:

1. The AESO must consult with those market participants that it considers are likely to be directly affected.
2. The AESO must forward the proposed reliability standards to the Alberta Utilities Commission for review, along with the AESO’s recommendation that the Commission approve or reject them.
3. The Commission must follow the recommendation of the AESO that the Commission approve or reject the proposed reliability standards unless an interested person satisfies the Commission that the AESO’s recommendation is “technically deficient” or “not in the public interest.”

Further, NERC has been advised by the AESO that the AESO practice with respect to the adoption of a NERC Reliability Standard includes a review of the NERC Reliability Standard for applicability to Alberta legislation and electric industry practice. NERC has been advised that, while the objective is to adhere as closely as possible to the requirements of the NERC Reliability Standard, each NERC Reliability Standard approved in Alberta (called an “Alberta reliability standard”) generally varies from the similar and related NERC Reliability Standard.

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NERC requests the AESO consider the adoption of Proposed Reliability Standard PRC-006-5 as set forth in the filing in Alberta as an “Alberta reliability standard(s),” subject to the required procedures and legislation of Alberta.

Please contact the undersigned if you have any questions concerning this filing.

Sincerely,

/s/ Lauren Perotti

Lauren Perotti  
*Senior Counsel for the North American Electric  
Reliability Corporation*

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**BEFORE THE  
ALBERTA ELECTRIC SYSTEM OPERATOR**

**NORTH AMERICAN ELECTRIC )  
RELIABILITY CORPORATION )**

**NOTICE OF FILING OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF PROPOSED  
RELIABILITY STANDARD PRC-006-5**

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*Counsel for the North American Electric  
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November 9, 2020

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<b>Exhibit A</b>	Proposed Reliability Standard PRC-006-5, Automatic Underfrequency Load Shedding
	<b>Exhibit A-1:</b> Clean
	<b>Exhibit A-2:</b> Redline to PRC-006-4
<b>Exhibit B</b>	Implementation Plan
<b>Exhibit C</b>	Reliability Standards Criteria
<b>Exhibit D</b>	Analysis of Violation Risk Factors and Violation Severity Levels
<b>Exhibit E</b>	Summary of Development History and Complete Record of Development
<b>Exhibit F</b>	Standard Drafting Team Roster for Project WECC-0138 PRC-006-3 Automatic Underfrequency Load Shedding, Five-year Review of Regional Variance

**BEFORE THE  
ALBERTA ELECTRIC SYSTEM OPERATOR**

**NORTH AMERICAN ELECTRIC )  
RELIABILITY CORPORATION )**

**NOTICE OF FILING OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF PROPOSED  
RELIABILITY STANDARD PRC-006-5**

The North American Electric Reliability Corporation (“NERC”) hereby submits proposed Reliability Standard PRC-006-5 – Automatic Underfrequency Load Shedding.<sup>1</sup> Proposed Reliability Standard PRC-006-5 includes revisions to the WECC regional Variance that clarify applicability of continent-wide requirements to entities in the Western Interconnection and clarify the applicability of the WECC regional Variance to Planning Coordinators. The continent-wide requirements were not changed substantively from proposed Reliability Standard PRC-006-4, which was submitted on February 27, 2020.<sup>2</sup>

Proposed Reliability Standard PRC-006-5 (**Exhibit A**) is just, reasonable, not unduly discriminatory or preferential, and in the public interest. NERC also submits the associated implementation plan (**Exhibit B**), and the associated Violation Risk Factors (“VRFs”) and Violation Severity Levels (“VSLs”) (**Exhibits A and D**).

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<sup>1</sup> Unless otherwise indicated, capitalized terms used in this Petition shall have the meaning set forth in the *Glossary of Terms Used in NERC Reliability Standards*, [https://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary\\_of\\_Terms.pdf](https://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary_of_Terms.pdf).

<sup>2</sup> *Notice of Filing of the North American Electric Reliability Corporation of Reliability Standards Developed Under the Standards Alignment with Registration Project* (Feb. 27, 2020). As further explained therein, NERC proposes to add the UFLS-Only Distribution Provider as an applicable UFLS entity in proposed Reliability Standard PRC-006-4.

This filing presents the technical basis and purpose of proposed Reliability Standard PRC-006-5, a summary of the development proceedings (**Section III.C** and **Exhibit E**), and a demonstration that the proposed Reliability Standard meets the Reliability Standards criteria (**Exhibit C**). Proposed Reliability Standard PRC-006-5 was approved by the WECC Board of Directors on March 11, 2020 and adopted by the NERC Board of Trustees on August 20, 2020.

## **I. SUMMARY**

Proposed Reliability Standard PRC-006-5 establishes design and documentation requirements for automatic underfrequency load shedding (“UFLS”) programs to arrest declining frequency, assist recovery of frequency following underfrequency events, and provide last resort system measures. The WECC regional Variance complements the continent-wide system performance levels by requiring further coordination among entities providing Planning Coordinator services in the Western Interconnection.

WECC developed the proposed revisions to the regional Variance in proposed Reliability Standard PRC-006-5 to further promote the coordinated planning and operation of the interconnected Bulk-Power System. The proposed revisions to the WECC regional Variance include: (1) clarifying that Requirements R14 and R15 of the continent-wide Reliability Standard do not apply to entities in the Western Interconnection; (2) clarifying that the use of “Planning Coordinator” in the WECC regional Variance is specific to those providing Planning Coordinator services to Registered Entities within the Western Interconnection; and (3) other non-substantive changes.

The WECC regional Variance in proposed Reliability Standard PRC-006-5 benefits reliability by providing additional clarity to ensure greater coordination and consistency among entities in the Western Interconnection regarding UFLS programs. As described more fully below,

the WECC regional Variance imposes more stringent communication requirements on entities than the continent-wide requirements through the use of its coordinated UFLS design assessment. As such, the regional Variance negates the need in the Western Interconnection for the response required in continent-wide Requirement R14. Accordingly, proposed PRC-006-5 includes revisions to the WECC regional Variance that clarify Requirement R14 does not apply to entities in the Western Interconnection. Moreover, because the three requirements triggering application of continent-wide Requirement R15 are not applicable in the Western Interconnection under the current WECC regional Variance, proposed PRC-006-5 clarifies that Requirement R15 does not apply to entities in the Western Interconnection. The currently effective version of the Reliability Standard would be retired following approval of the proposed Reliability Standard PRC-006-5 and its associated elements.<sup>3</sup>

## II. NOTICES AND COMMUNICATIONS

Notices and communications with respect this filing may be addressed to the following:

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<sup>3</sup> Should proposed Reliability Standard PRC-006-5 be approved so that PRC-006-4 is superseded prior to ever becoming effective, NERC requests the retirement of the currently effective version, Reliability Standard PRC-006-3, to be effective immediately prior to the effective date of PRC-006-5.

### **III. BACKGROUND**

The following background information is provided below: (a) the history of the WECC regional Variance in PRC-006; (b) an explanation of the WECC Regional Reliability Standards development process; and (c) a summary of the development process for the proposed Reliability Standard.

#### **A. History of the WECC Regional Variance in PRC-006**

Reliability Standard PRC-006-1, submitted on April 13, 2011, included a WECC regional Variance.<sup>4</sup> The purpose of the WECC regional Variance was, and remains, to require Planning Coordinators in the Western Interconnection to implement the WECC Off-Nominal Frequency Load Shedding Plan (“WECC Coordinated Plan”) while meeting the system performance levels in the continent-wide Reliability Standard.<sup>5</sup> The WECC regional Variance remained substantively unchanged through the currently enforceable version of the Reliability Standard, PRC-006-3. On February 27, 2020, NERC submitted proposed Reliability Standard PRC-006-4, among other proposed Reliability Standards developed through a NERC project to align the Reliability Standards with registration changes previously submitted by NERC.<sup>6</sup> Proposed Reliability Standard PRC-006-4 does not revise the WECC regional Variance but proposes the addition of UFLS-Only Distribution Provider as an applicable entity to comport with Appendix 5B of the NERC Rules of Procedure. The proposed Reliability Standard discussed in this filing, PRC-006-5, incorporates the proposed revisions in PRC-006-4.

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<sup>4</sup> . *Notice of Filing of the North American Electric Reliability Corporation of Proposed New Reliability Standards and Implementation Plans Related to Under-Frequency Loadshedding*, (Apr. 13, 2011).

<sup>5</sup> *Id.*

<sup>6</sup> *Notice of Filing of the North American Electric Reliability Corporation of Reliability Standards Developed Under the Standards Alignment with Registration Project*, Docket No. RD20-4-000 (Feb. 21, 2020).

## **B. WECC Regional Reliability Standards Development Process**

The WECC regional Variance in proposed Reliability Standard PRC-006-5 was developed in an open and fair manner and in accordance with the WECC Reliability Standards Development Procedure (“RSDP”). WECC’s RSDP provides for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing Reliability Standards and thus addresses several of the Reliability Standards criteria. The development process is open to any person or entity that is an interested stakeholder. WECC considers the comments of all stakeholders, and a vote of stakeholders and the WECC Board of Directors is required to approve a WECC regional Variance to a Reliability Standard. NERC posts each regional Variance developed by a Regional Entity for an additional comment period. The NERC Board of Trustees must adopt the regional Variance before it is submitted to the applicable governmental authorities.

## **C. Development of the WECC Variance in Proposed Reliability Standard PRC-006-5**

The WECC Standards Committee (“WSC”), in accordance with the WECC RSDP, ensures the review of each regional Reliability Standard at least once every five years, measured from the most recent effective date of the document under review. The proposed Reliability Standard and accompanying revised regional Variance were developed in accordance with the WECC RSDP, as further described in **Exhibit E** hereto. The drafting team (**Exhibit F**) consisted of individuals with relevant expertise in the subject matter area and included representatives from WECC staff and industry. On February 6, 2020, the WECC ballot body approved the regional Variance with a 100 percent affirmative vote at 97.4 percent quorum. The WECC Board of Directors approved the regional Variance on March 11, 2020. NERC posted the regional Variance for a 45-day comment period from May 21, 2020 through July 6, 2020. Commenters agreed that WECC’s process was open, inclusive, balanced, transparent, and provided due process. During this development process,

WECC incorporated the revisions from PRC-006-4 into PRC-006-5. The NERC Board of Trustees adopted proposed Reliability Standard PRC-006-5 on August 20, 2020.

#### IV. JUSTIFICATION

Proposed Reliability Standard PRC-006-5 revises the WECC regional Variance, clarifying applicability for entities in the Western Interconnection. Specifically, the revised preamble to the regional Variance clarifies the applicability of continent-wide requirements to entities in the Western Interconnection and the applicability of the WECC regional Variance to those Planning Coordinators providing Planning Coordinator services to entities operating within the Western Interconnection, regardless of the Planning Coordinator's physical location. The revised preamble to the WECC regional Variance reads as follows:

The following Interconnection-wide variance shall be applicable in the Western **Interconnection** ~~Electricity Coordinating Council (WECC)~~ and replaces, in their entirety, Requirements R1 **through R5, and R11 through R15, ~~R2, R3, R4, R5, R11, R12, and R13.~~**

**As used in the RV, Planning Coordinator is specific to those Planning Coordinators providing Planning Coordinator service(s) to entities within the Western Interconnection, regardless of where the Planning Coordinator is located.**

The effect of the preamble modification is to replace continent-wide Requirements R14 and R15 with the WECC regional Variance, clarifying that those requirements do not apply to entities in the Western Interconnection. Rather, entities in the Western Interconnection would apply the more stringent requirements in the WECC regional Variance. In addition to the revisions to the preamble noted above, proposed PRC-006-5 includes other minor, non-substantive changes. The justification for replacing Requirements R14 and R15 with the WECC regional Variance is discussed in detail below in Sections I.A and I.B.

#### **A. Replacement of Requirement R14**

The proposed revisions to the WECC regional Variance impose more stringent communication and coordination requirements than Requirement R14 in the continent-wide Reliability Standard. Requirement R14 facilitates communication between Planning Coordinators and impacted entities while accounting for regional variation. Requirement R14, in PRC-006-1 and carried through to the currently proposed PRC-006-5, mandates that Planning Coordinators respond to written comments submitted by UFLS entities and Transmission Owners within its Planning Coordinator area after the opportunity to comment and before finalizing the UFLS program. Transmission Owners and other UFLS entities are permitted, rather than required, to participate in the UFLS development process. Additionally, the standard drafting team that developed PRC-006-1 noted that PRC-006 does not preclude the development of regional standards to provide the opportunity for the involvement of all interested entities within the region.<sup>7</sup> The intent of Requirement R14, therefore, is to allow communication of impacted entities, while permitting regional variation.

The currently effective WECC regional Variance is more stringent than Requirement R14 because of its enhanced communications requirements, and should therefore replace Requirement R14 in its entirety for entities in the Western Interconnection. The WECC regional Variance requires each Planning Coordinator to “participate in a joint regional review with the other Planning Coordinators.”<sup>8</sup> Then, entities adopt a coordinated Interconnection-wide UFLS program that includes notification of and a schedule for implementation by UFLS entities, which includes

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<sup>7</sup> *Notice of Filing of the North American Electric Reliability Corporation of Proposed New Reliability Standards and Implementation Plans Related to Under-Frequency Loadshedding*, (Apr. 13, 2011)

<sup>8</sup> Reliability Standard PRC-006-3 (Automatic Underfrequency Load Shedding), Regional Variance for the Western Electricity Coordinating Council, at D.B.1.

Transmission Owners and Distribution Providers, within its area.<sup>9</sup> The required participation in, and documentation of, a coordinated UFLS design assessment supports the WECC regional Variance’s coordination between Planning Coordinators and UFLS entities.<sup>10</sup> Within the Western Interconnection, the coordinated UFLS design assessment occurs through the UFLS Work Group (“UFLSWG”). The UFLSWG reviews biennially the WECC Coordinated Plan to evaluate consistency with PRC-006.<sup>11</sup> As required by the UFLSWG Charter, the UFLSWG will “collaborate with all applicable entities to develop an annual report of the findings of the review and simulations.”<sup>12</sup>

Furthermore, the WECC regional Variance exceeds the stringency of Requirement R14 by mandating participation from any entity required to provide off-nominal frequency protection. Thereafter, those entities “have agreed to follow and operate their systems in accordance with [the WECC Coordinated Plan] as an essential element of the well-planned and operated Western Interconnection electric system.”<sup>13</sup> Replacing Requirement R14 with the WECC regional Variance in the Western Interconnection provides additional clarity to applicable entities in the Western Interconnection about the requisite communication and coordination in the WECC regional Variance, thereby enhancing reliability.

Additionally, the current WECC regional Variance provides more specificity as compared with Requirement R14 of the continent-wide Reliability Standard. The currently effective WECC regional Variance addresses required timeframes in the Western Interconnection as follows: (1)

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<sup>9</sup> *Id.* at D.B.3.

<sup>10</sup> *Id.* at D.B.4., D.B.11., and D.B.12.

<sup>11</sup> Under-Frequency Load Shedding Review Work Charter (2020), available at <https://www.wecc.org/Corporate/UFLSWG%20Charter.pdf>.

<sup>12</sup> *Id.*

<sup>13</sup> WECC, WECC Off-Nominal Frequency Load Shedding Plan at 5, <https://www.wecc.org/Reliability/Off-Nominal%20Frequency%20Load%20Shedding%20Plan.pdf>.

participation in and documentation of a coordinated UFLS design assessment at least once every five years;<sup>14</sup> (2) conducting and documenting a coordinated event assessment within one year of the event actuation;<sup>15</sup> and (3) participating in and documenting a coordinated UFLS design assessment of the UFLS program to consider the identified deficiencies within two years of event actuation.<sup>16</sup> As a result, the additional specificity of actionable timeframes in the WECC regional Variance enhances reliability to the Bulk-Power System.

## **B. Replacement of Requirement R15**

The proposed revisions to the WECC regional Variance clarify that Requirement R15 does not apply in the Western Interconnection. Requirement R15 is only triggered by Requirements R4, R5, or R12, which are replaced in their entirety by the current WECC regional Variance. As such, the replacement of Requirement R15 with the regional Variance is a clarifying, administrative change to help ensure greater coordination and consistency.

Furthermore, the reliability task required in Requirement R15, the creation of a Corrective Action Plan,<sup>17</sup> is addressed in the currently effective WECC regional Variance. As required by the WECC regional Variance, Planning Coordinators in the Western Interconnection must participate in an Interconnection-wide coordinated effort to identify “portions of the BES that may form islands.”<sup>18</sup> The result of that identification serves as the basis for an Interconnection-wide coordinated UFLS program adopted by the Planning Coordinator.<sup>19</sup> Continent-wide Requirement

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<sup>14</sup> Reliability Standard PRC-006-3 (Automatic Underfrequency Load Shedding), Regional Variance for the Western Electricity Coordinating Council, at D.B.4.

<sup>15</sup> *Id.* at D.B.11.

<sup>16</sup> *Id.* at D.B.12.

<sup>17</sup> Requirement R15 of PRC-006-3 and PRC-006-4 reads as follows: “Each Planning Coordinator that conducts a UFLS design assessment under Requirement R4, R5, or R12, and determines that the UFLS program does not meet the performance characteristics in Requirement R3, shall develop a Corrective Action Plan and a schedule for implementation by the UFLS entities within its area.”

<sup>18</sup> *Id.* at D.B.1.

<sup>19</sup> *Id.* at D.B.2 and D.B.3.

R15 mandates that the Planning Coordinator correct identified deficiencies through a Corrective Action Plan addressing cyclical milestones at either two or five years, depending on the fact pattern.<sup>20</sup> Similarly, within the WECC regional Variance, Planning Coordinators must participate in an Interconnection-wide coordinated assessment, documentation, and required adoption of a coordinated UFLS program addressing Interconnection-specific design criteria, which are reviewed at either two or five years depending on the fact pattern.<sup>21</sup> Planning Coordinators are required to address deficiencies identified in the coordinated UFLS program to meet the performance characteristics set forth in D.B.3. The WECC regional Variance therefore meets the intent of a Corrective Action Plan. As such, the changes to the WECC regional Variance preamble are clarifications and will not impact reliability.

**C. Enforceability of Proposed Reliability Standard PRC-006-5**

The revised regional Variance for the Western Interconnection in proposed Reliability Standard PRC-006-5 includes VRFs and VSLs for each requirement. The VSLs provide guidance on the way that NERC will enforce the requirements of the proposed Reliability Standard. The VRFs are one of several elements used to determine an appropriate sanction when the associated requirement is violated. The VRFs assess the impact to reliability of violating a specific requirement. The VRFs and VSLs for the continent-wide requirements have not been substantively changed from proposed Reliability Standard PRC-006-4. As demonstrated in **Exhibit D**, there are no proposed changes to the VRFs and the proposed changes to the VSL are conforming changes (changing “in the WECC Regional Entity area” to “across the Western Interconnection” to match the requirement language) that do not alter the substance of the VSL. The VRFs and VSLs in the

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<sup>20</sup> *Id.* at R4, R11, and R12.

<sup>21</sup> *Id.* at D.B.3, D.B.4, D.B.11, and D.B.12.

revised WECC regional Variance, therefore, continue to comport with NERC and Federal Energy Regulatory Commission (“FERC”) guidelines related to their assignment.

The proposed Reliability Standard also includes measures that support each requirement by clearly identifying what is required and how the requirement will be enforced. These measures help ensure that the requirements will be enforced in a clear, consistent, and non-preferential manner and without prejudice to any party. Substantively, the measures remain unchanged, with only minor revisions changing “WECC Regional Entity area” to “Western Interconnection” and other non-substantive changes to provide additional clarity.

## **V. EFFECTIVE DATE**

The proposed implementation plan is provided in **Exhibit B** hereto. The proposed implementation plan provides that proposed Reliability Standard PRC-006-5 would become effective on the first day of the second quarter following regulatory approval. The currently effective version of the standard would be retired immediately prior to the effective date of the revised Reliability Standard.<sup>22</sup> The timeframe balances the need for time to make administrative changes for entities within the Western Interconnection and the need to implement the requirement expeditiously.

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<sup>22</sup> Should the proposed Reliability Standard PRC-006-5 be approved so that PRC-006-4 is superseded prior to ever becoming effective, NERC requests the retirement of the currently effective version, Reliability Standard PRC-006-3, to be effective immediately prior to the effective date of PRC-006-5.

Respectfully submitted,

/s/ Alexander Kaplen

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*Counsel for the North American Electric  
Reliability Corporation*

Date: November 9, 2020

**EXHIBITS A - B and D - F**

## Exhibit C — Reliability Standards Criteria

### Reliability Standards Criteria

The discussion below explains how the proposed Reliability Standards have met or exceeded the Reliability Standards criteria. For purposes of this filing, the use of the term Reliability Standard is synonymous with Regional Variance (RV), unless otherwise specified.

### **Designed for a Specific Goal**

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**Proposed Reliability Standards must be designed to achieve a specified reliability goal.**

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American bulk power systems. Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring that each standard serves a purpose in support of reliability of the North American bulk power systems. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring that no standard undermines reliability through an unintended consequence. NERC Reliability Principles<sup>1</sup>

The purpose of PRC-006-5, Automatic Underfrequency Load Shedding is:

“To establish design and documentation requirements for automatic underfrequency load shedding (UFLS) programs to arrest declining frequency, assist recovery of frequency following underfrequency events and provide last resort system preservation measures.”

Of the eight NERC Reliability Principles, this standard addresses Reliability Principle 1, which states:

“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.”

### **Technically Sound**

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**Proposed Reliability Standards must contain a technically sound method to achieve the goal.**

#### **Standard Development**

This proposed Reliability Standard was developed using the NERC and WECC Reliability Standards Development Procedures (Procedures) and in effect at each point in the process. Among other things, these processes include drafting of the standard by a drafting team

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<sup>1</sup> NERC Reliability Principles.

composed of subject matter experts (SME); biographies of those SMEs are provided with this filing.

These processes also include repeated public iterative comment/response cycles through which comments are received from the industry, and responses to those comments are provided by the drafting team.

## Technically Sound

This project updates the RV preamble clarifying:

1. Requirements R14 and R15 are not applicable within the Western Interconnection; and
2. Tasks assigned to Planning Coordinators (PC) are applicable regardless of where the PC is located.

Requirement R14's purpose is to ensure communication between impacted entities. The requirement that Planning Coordinators (PCs) "participate in and document a coordinated UFLS design assessment" achieves this goal at D.B.4., D.B.11., and D.B.12.

Requirement R15's purpose is to ensure Planning Coordinators develop Corrective Action Plans in conjunction with Requirements R4, R5, or R12. As approved, the RV replaces R4, R5, and R12; therefore, R15 does not apply in the Western Interconnection. The reliability task of R15 is addressed in the RV at D.B.4. and D.B.12.

Additional non-substantive changes were made conforming the document to NERC's most recent drafting and templating conventions.

## Applicability

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**Proposed Reliability Standards must be applicable to users, owners, and operators of the bulk power system, and not others.**

The updated Regional Variance does not change the existing Applicability section that reads as follows:

4. Applicability:
  - 4.1. Planning Coordinators
  - 4.2. UFLS entities shall mean all entities that are responsible for the ownership, operation, or control of UFLS equipment as required by the UFLS program established by the Planning Coordinators. Such entities may include one or more of the following:

4.2.1 Transmission Owners

4.2.2 Distribution Providers

- 4.3. Transmission Owners that own Elements identified in the UFLS program established by the Planning Coordinators.

## **Clear and Unambiguous**

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**Proposed Reliability Standards must be clear and unambiguous as to what is required and who is required to comply.**

(See above at Technically Sound.)

## **Understandable Consequence**

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**Proposed Reliability Standards must include clear and understandable consequences and a range of penalties (monetary and/or non-monetary) for a violation.**

This filing does not substantively change the Violation Risk Factors (VRF) or the Violation Severity Levels (VSL).

## **Measurability for Compliance**

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**Proposed Reliability Standards must identify a clear and objective criterion or measure for compliance, so that it can be enforced in a consistent and non-preferential manner.**

The filing does not substantively change the Measures. The word “shall” was replaced with “will” aligning the language with NERC’s most recent drafting conventions.

## **Effective and Efficient**

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**Proposed Reliability Standards should achieve a reliability goal effectively and efficiently - but does not necessarily have to reflect “best practices” without regard to implementation cost.**

During the single posting of the project, no concerns were raised regarding implementation costs or historical regional infrastructure.

The proposed Regional Variance reaches its goals effectively and efficiently by using existing business practices. As of this filing, forums are already created and actively pursuing the tasks required in the variance.

## **Lowest Common Denominator**

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**Proposed Reliability Standards cannot be “lowest common denominator,” i.e., cannot reflect a compromise that does not adequately protect bulk power system reliability.**

This filing does not change the previously approved reliability tasks.

## **Costs**

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**Proposed Reliability Standards may consider costs to implement for smaller entities but not at consequence of less than excellence in operating system reliability.**

During the development of the project, the industry raised no such concerns.

## **Continent-wide and Regional Variations**

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**Proposed Reliability Standards must be designed to apply throughout North America to the maximum extent achievable with a single reliability standard while not favoring one area or approach.**

Regional Entities may propose Regional Reliability Standards that set more stringent reliability requirements than the NERC Reliability Standard or cover matters not covered by an existing NERC Reliability Standard. NERC Rules of Procedure, Section 312, Regional Reliability Standards.

The proposed Regional Variance is applicable only in the Western Interconnection.

The reliability tasks covered in the Regional Variance are already in effect.

## **No Undue Negative Effect**

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**Proposed reliability standards should cause no undue negative effect on competition or restriction of the grid.**

The assigned drafting team does not foresee any negative impacts on competition resulting from the proposed Regional Variance.

During the development phase of this project, the industry raised no concerns regarding competition or restrictive use of the grid.

## **Implementation of New Requirements (Effective Date)**

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**The implementation time for the proposed Reliability Standards must be reasonable.**

In accordance with the WECC Reliability Standards Development Procedures, an implementation plan for the proposed Regional Variance was included with Posting 1 of this project. The plan is included as **Exhibit B** of this filing.

### **Proposed Effective Date and Justification**

The proposed effective date is the “First day of the second quarter following regulatory approval.”

This filing does not alter existing Requirements. As such, approval will have no detrimental impact on reliability, imposes no undue burden on the applicable entities, and has no impact on other NERC Standards.

## **Fair and Open Process**

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**The Reliability Standard development process must be open and fair.**

WECC followed the WECC Reliability Standards Development Procedures (Procedures) in effect at the time of each step in the process.

In accordance with the Procedures, all drafting team meetings are open to the public.

All drafting team meetings were announced via the WECC Standards Email List for the period prescribed in the Procedures. Notice of the meetings was provided to NERC and posted on the WECC Calendar along with meeting minutes.

All meetings were supported by a telephone conference bridge associated with an online internet visual capability allowing all participants to see the document(s) as they were being developed. Further, this team held an open-mic Standards Briefing before balloting which afforded the industry an additional opportunity to have its questions addressed.

This project was posted once for public comment at WECC.

Comments and the associated responses are currently posted on the WECC website, on the WECC-0138 project page, under the Submit and Review Comments accordion.<sup>2</sup> Responses to Comments received were provided with this filing in **Attachment E**.

In addition to posting under the WECC Procedures, this project was also posted by NERC for 45 days in accordance with NERC's Rules of Procedure and NERC's internal business practices.

## **Balanced with Other Vital Interests**

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**Proposed Reliability Standards must balance with other vital public interests.**

NERC is not aware of any other vital public interests. No such balancing concerns were raised or noted.

## **Consideration of Other Facts**

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**Proposed Reliability Standards must consider any other relevant factors.**

NERC is not aware of any other general factors in need of consideration.

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<sup>2</sup> <https://www.wecc.org/Standards/Pages/WECC-0138.aspx>