

June 2, 2021

VIA ELECTRONIC FILING

Mr. Patrick Wruck, Commission Secretary
British Columbia Utilities Commission
Box 250, 900 Howe Street
Sixth Floor
Vancouver, B.C.
V6Z 2N3

Re: *North American Electric Reliability Corporation*

Dear Mr. Wruck:

The North American Electric Reliability Corporation (“NERC”) hereby submits Notice of Filing of the North American Electric Reliability Corporation of Amendments to the Western Electricity Coordinating Council Regional Reliability Standards Development Procedures. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

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*

1325 G Street NW Suite 600
Washington, DC 20005
202-400-3000 | www.nerc.com

**BEFORE THE
BRITISH COLUMBIA UTILITIES COMMISSION
OF THE PROVINCE OF BRITISH COLUMBIA**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NOTICE OF FILING OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF
AMENDMENTS TO THE WESTERN ELECTRICITY COORDINATING COUNCIL
REGIONAL RELIABILITY STANDARDS DEVELOPMENT PROCEDURES**

Lauren A. Perotti
Senior Counsel
Marisa Hecht
Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
202-400-3000
lauren.perotti@nerc.net
marisa.hecht@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

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ATTACHMENTS

ATTACHMENT 1: Amended Western Electricity Coordinating Council Regional Reliability
Standards Development Procedures – Clean

ATTACHMENT 2: Amended Western Electricity Coordinating Council Regional Reliability
Standards Development Procedures – Redline

**BEFORE THE
BRITISH COLUMBIA UTILITIES COMMISSION
OF THE PROVINCE OF BRITISH COLUMBIA**

**NORTH AMERICAN ELECTRIC)
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**NOTICE OF FILING OF THE
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AMENDMENTS TO THE WESTERN ELECTRICITY COORDINATING COUNCIL
REGIONAL RELIABILITY STANDARDS DEVELOPMENT PROCEDURES**

The North American Electric Reliability Corporation (“NERC”) hereby provides notice of the revised Western Electricity Coordinating Council (“WECC”) Regional Reliability Standards Development Procedures (“RSDP”).¹

As described in greater detail in Section II of this filing, WECC made several revisions to its RSDP to reflect updates to WECC Guidelines and language to meet current drafting conventions and formats. The NERC Board of Trustees approved the revised WECC RSDP at its May 13, 2021 meeting. **Attachments 1 and 2** to this filing are clean and redlined versions, respectively, of the proposed revised WECC RSDP.

I. NOTICES AND COMMUNICATIONS

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

Lauren Perotti
Senior Counsel
Marisa Hecht
Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 400-3000
lauren.perotti@nerc.net

¹ NERC maintains an up-to-date copy of each Regional Entity’s standards development procedure on its website at: <https://www.nerc.com/AboutNERC/Pages/Regional-Entity-Delegation-Agreements.aspx>.

marisa.hecht@nerc.net

II. PROPOSED AMENDMENTS TO THE WECC REGIONAL RELIABILITY STANDARDS DEVELOPMENT PROCEDURES

NERC submitted the currently effective version of the WECC RSDP on June 14, 2017.² The WECC RSDP provides that the RSDP will be reviewed for revision as needed. Consistent with this provision, WECC reviewed its RSDP in 2020 and made revisions to update the document. The revisions are summarized below. All changes appear in redline in **Attachment 2** to this filing.

First, WECC revised its RSDP to account for the WECC Guideline “Responding to Comments Received During Ballot”, approved by the WECC Standards Committee (“WSC”) on March 6, 2018.³ The purpose of this WECC Guideline is to provide guidance to drafting teams and the WSC on treating new reliability issues after the drafting team forwards the ballot and accompanying narrative to the WSC. WECC proposed a new section, “Treatment of Abstentions and Explanatory Narrative during Ballot” in the WECC RSDP to incorporate this WECC Guideline.

Second, WECC revised its RSDP to account for the WECC Guideline “WECC Standards Committee Assignment of Drafting Teams”, approved by the WSC on March 5, 2019.⁴ The purpose of this WECC Guideline is to aid the WSC in assigning multiple drafting team nominees from one entity to the same drafting team. WECC proposed including language reflecting the

² See Notice of Filing of the North American Electric Reliability Corporation of Amendments to the Western Electric Coordinating Council Regional Reliability Standards Development Procedures, June 14, 2017.

³ Western Electricity Coordinating Council, *Responding to Comments Received During Ballot* (2018), available at <https://www.wecc.org/Administrative/WSC%20Guideline%20-%20Responses%20to%20Comments%20Received%20During%20Ballot%20-%20Final%203-6-2018%20-%20Newest%20Template%206-2019.pdf>.

⁴ Western Electricity Coordinating Council, *WECC Standards Committee Assignment of Drafting Teams* (2019), available at <https://www.wecc.org/Administrative/WSC%20Guideline%20-%20Drafting%20Team%20Assignments%20-%20Clean%20from%20Tech%20Writer.pdf>.

permissibility of multiple nominees from the same entity to the same drafting team, but notes that the represented entity has only one vote on matters.

Third, certain revisions are made to facilitate efficient administration of the standard development process. Certain notice periods (Step 8, Convene a Standards Briefing and Step 9, Form the Ballot Pool and Ballot the Standard) are shortened. Additionally, language is proposed to allow the Director of Standards to authorize late applications to join the ballot pool, such as in the event of unforeseen circumstances.

Fourth, certain provisions related to the roles and responsibilities of the WSC are revised consistent with the role of the WSC as a procedural oversight body.

Fifth, and lastly, WECC made non-substantive revisions to the WECC RSDP to improve readability and clarity. WECC updated language to meet current drafting conventions and formats following WECC's introduction of its new corporate branding, including new document templates and editorial styles. Additionally, WECC clarified certain terms and added definitions, where appropriate.

III. WECC AND NERC APPROVALS FOR PROPOSED AMENDMENTS

The revised WECC RSDP were approved by the WSC on October 22, 2020 in accordance with WECC RSDP, STEP 7. The revised WECC RSDP were posted on the WECC website for regional ballot body comments from November 18, 2020 through December 2, 2020. The revised WECC RSDP achieved 100% approval with 86.7% quorum. In accordance with the WECC RSDP, STEP 11, the revised WECC RSDP were approved by the WECC Board of Directors on December 9, 2020.

The WECC RSDP were posted on the NERC website for industry stakeholder comment from February 17, 2021 through April 2, 2021. Four sets of responses were received, all of which

indicated that the WECC RSDP continues to meet the criteria to be open, inclusive, balanced, and transparent and to provide for due process. The NERC Board of Trustees approved the amendments to the WECC RSDP at its May 13, 2021 meeting.

Respectfully submitted,

/s/ Lauren Perotti

Lauren Perotti

Senior Counsel

Marisa Hecht

Counsel

North American Electric Reliability Corporation

1325 G Street, N.W., Suite 600

Washington, D.C. 20005

202-400-3000

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marisa.hecht@nerc.net

Counsel for the North American Electric Reliability Corporation

Date: June 2, 2021

ATTACHMENTS 1 and 2