

# Reliability Standards Development Procedures

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WECC Standards Department  
WECC Standards Committee  
FERC Approved: October 27, 2017



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## Introduction

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The Western Electricity Coordinating Council (WECC) is a Regional Entity authorized through a delegation agreement between the North American Electricity Reliability Corporation (NERC) and WECC pursuant to Section 215 of the Federal Power Act. NERC delegates designated powers, rights, and responsibilities to WECC regarding the administration within the Western Interconnection of electric Reliability Standards adopted or approved by NERC and the Federal Energy Regulatory Commission (FERC).<sup>1</sup>

These Reliability Standards Development Procedures (Procedures) define the process to be used by WECC for the development, modification, retirement, and interpretation of Regional Reliability Standards (RRS) and WECC Regional Criteria (CRT).

These Procedures establish an open and transparent process for the development of WECC RRSs and CRTs. These Procedures include, but are not limited to, public notice of intent to develop RRSs and CRTs, a public comment period on the proposed documents, due consideration of comments provided, and a balanced Ballot Body.

The Procedures shall be interpreted and applied in a manner that is consistent with the WECC Bylaws. Should any conflict arise between the Procedures and the WECC Bylaws, the WECC Bylaws will prevail.

## Definitions

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### Ballot Body

That body of qualified persons that register with WECC for participation in Ballot Pools.

### Ballot Pool

That pool of Ballot Body entities that have registered to vote on a specific document.

### Drafting Team (DT)

A team of pertinent subject-matter experts (SME) appointed by the WECC Standards Committee (WSC) to develop the document(s) called for in a Standard Authorization Request (SAR), consider and respond to industry comments, participate in forums to help build consensus on draft documents, and to perform other tasks as assigned by the WECC Standards Committee (WSC).

### NERC Compliance Registry

Registry of the Bulk Electric System owners, operators, and users that are subject to approved reliability standards.

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<sup>1</sup> Unless otherwise specified, capitalized terms are defined in the NERC Glossary of Terms Used in Reliability Standards.

**Non-Substantive Changes**

Revisions that do not change the scope, applicability, or intent of any requirement, including but not limited to, correcting the numbering of a requirement, correcting references, changes to document styles and templates, correcting the spelling of a word, adding an obviously missing word, or rephrasing a requirement for improved clarity.

**Regional Criteria (CRT)**

As defined in the NERC Rules of Procedure.

**Regional Reliability Standard (RRS)**

As defined in the NERC Rules of Procedure.

**Standard Authorization Request (SAR)**

The WECC form titled Standard Authorization Request (SAR) administered by the WECC Standards Department for the purpose of requesting development, modification, retirement, interpretation, or other disposition of an RRS or CRT.

**Standards Briefing**

Any meeting initiated by WECC for the purpose of creating an open forum for discussion and explanation of an RRS or CRT; generally, but not exclusively, held during the development process of those documents in advance of a ballot window.

**Standards Email List (SEL)**

Email list(s) established and maintained by WECC for the purpose of communicating due process activity; generally, but not exclusively, for standards-related activities.

**Substantive Changes**

A Substantive Change is one that changes the scope, applicability, required actions, or intent of the document.

**WECC Standards Committee (WSC)**

The committee established by the WECC Board of Directors (Board) for the purpose of overseeing the implementation of these Procedures pursuant to its Board-approved charter.

**Overview**

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This document has two primary sections. The first section describes the steps to be taken during development of an RRS or CRT, absent exceptional circumstances. The second section augments the first with Supporting Processes to address exceptions such as an expedited process for urgent actions, addressing regulatory directives, and maintenance of certain documents.

## Development Steps

The following steps are included in the development of an RRS or CRT, absent exceptional circumstances. Click on any item below to display details on how to complete the step.

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The following related processes are included in the Supporting Processes section:

- Expedited Process for Urgent Action
- Regulatory Directives
- Maintenance of the Procedures
- Maintenance of RRSs and CRTs
- Field Tests

## Notices and Counting of Days

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Notices required under these Procedures shall be distributed electronically via WECC's SEL(s) and deemed delivered when dispatched.

Concurrent running of notice and posting periods is explicitly allowed.

WECC shall provide notice to NERC of all standards-related activities by including NERC on WECC's SEL. Inclusion of a NERC-provided email address on the related SEL shall constitute coordination of notice to NERC of standards-related activities and shall be deemed delivered when dispatched via the SEL(s).

Any person may receive notices provided via the SEL.

All references to days are calendar days. When counting the number of days, the count shall exclude the first day of the time window to be measured. If a terminus date falls on a weekend or a day that WECC is scheduled to be closed, the new terminus date shall be the day following the weekend or WECC closure day.

For example, if a 14-day period ends on a holiday then the terminus date is on the following WECC business day.

## WECC Standards Committee

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The WSC manages these Procedures. The WSC protects the integrity, credibility and implementation of the Procedures while acting in accordance with the WSC Charter. Delineation of specific WSC duties, WSC composition and governance, WSC voting privileges, and other related practices, is included in the WSC Charter, as approved by the Board.

## WECC Standards Voting Segments

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WECC's Standards Voting Segment (SVS) shall be the same as those established by NERC.<sup>2</sup> A qualifying entity may register and cast a ballot in any SVS(s) for which it qualifies.

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<sup>2</sup> NERC currently establishes its SVS in the NERC Rules of Procedure, Appendix 3D – Development of the Registered Ballot Body. If the SVSs contained in that appendix or its successor should vary from time to time it is the intent of these Procedures that WECC's SVS will mirror those of NERC without requiring further change to the Procedures to accommodate those changes.

## Process for Development of Regional Reliability Standards, Regional Criteria, and Interpretations

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### Step 1 – Submit and Validate a Standard Authorization Request

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Development, revision, retirement, or interpretation of an RRS or CRT shall be initiated by the filing of a Standard Authorization Request (SAR) by any person or entity. A SAR is filed by completing the electronic fields of the online WECC SAR form. WECC staff shall review the incoming SAR to ensure it is valid.<sup>3</sup> Once deemed valid, the SAR shall be posted on the WECC website and notification shall be sent to the SEL.

### Step 2 – Complete SAR and Present to the WSC

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WECC staff shall assign a unique tracking number to each SAR. The unique tracking number shall be used to identify the SAR throughout the development and archival processes. The SAR and those documents developed in response to the SAR shall be publicly accessible on the WECC website throughout the development process. WECC staff shall determine within 30 days of receiving a SAR whether it is complete. WECC staff may assist with completing the SAR, or report to the WSC that it is incomplete and request guidance.

To be deemed complete, each SAR shall contain a description of the proposed RRS or CRT subject matter sufficiently detailed to define the purpose, scope, impacted parties, requirements, and any other information relevant to the proposed RRS or CRT. Once WECC staff agrees it is complete, WECC staff shall place the SAR on the agenda for the next scheduled WSC meeting for disposition, subject to required notice. Notice of WSC meetings and posting of WSC agendas will be provided in accordance with the WSC Charter.

The WSC shall determine whether the SAR is within the scope of WECC's authority and activities, and is appropriate for development. Public comment on the SAR will be reviewed and considered by the WSC during a duly noticed WSC meeting prior to the WSC approving the SAR.

The WSC shall make the above determination within 90 days of the date that the SAR is received by WECC, except where the SAR has been remanded, in which case the WSC shall make that determination within 30 days of receiving the curative SAR.

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<sup>3</sup> A "valid" SAR is different than a "complete" SAR. A SAR is deemed valid by staff as a threshold review that filters out spam and unwanted nuisance documents that may be received via an open website portal. Whether a SAR is "complete" is addressed in Step 2.

The WSC shall ensure that the SAR provides enough information that a Drafting Team (DT) will have a clear understanding of the reasons for, and nature of, the RRS or CRT to be developed. The SAR author may be asked to further assist in the development or clarification of the SAR.

The WSC may accept the SAR, in which case development proceeds to Step 3.

The WSC may remand a SAR if it determines the content of the SAR is deficient. If the SAR is deemed deficient, the WSC shall specify the deficiency identified in the SAR and suggest potential remedies as part of its remand. WECC staff will make reasonable efforts to assist the SAR author in addressing the deficiencies identified by the WSC.

The SAR author shall have 30 days from the date of remand or until the 60th day following submittal of the SAR, whichever is longer, to remedy each deficiency identified in the remand, or withdraw the SAR.

If the deficiencies are remedied, WECC staff will resubmit the SAR to the WSC for disposition. If the deficiencies are not remedied within the allotted period: 1) the SAR will be deemed incomplete, 2) no further developmental action will be taken on the SAR, and 3) the SAR will be archived. The SAR author may submit a new SAR without prejudice based on the same or similar fact pattern.

The WSC may reject a SAR if it determines the SAR is outside the scope of WECC's authority or is not appropriate to be undertaken by WECC. If a SAR is rejected, the WSC shall post its explanation for rejection on the WECC website. Notification of the WSC's decision shall:

- 1) be communicated to the SAR author, the Board, and the SEL,
- 2) reference the unique SAR tracking number and direct the recipient to supporting information as appropriate, and
- 3) be made no more than 30 days from the date of the WSC's determination.

The WSC's decision to reject a SAR may be appealed to the Board.

### **Step 3 – Convene the Drafting Team**

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If it accepts a SAR, the WSC may, at its discretion, expand or narrow the scope of the SAR at any time during the development process prior to approving the project for ballot. The WSC shall prioritize the development of the SAR in relation to other RRSs or CRTs proposed for development under the Procedures, as may be required based on the volume of requests and available resources. If prioritization dictates a postponed starting date, the WSC shall either set a postponed starting date or set a review date at which the WSC shall re-evaluate the SAR for purposes of its progress through these Procedures. In no case shall the review date be more than 180 days after the date the SAR was received.

Upon establishing a start date for the development of an RRS or CRT, the WSC shall convene a DT to develop the RRS or CRT required by the SAR. The WSC may either directly assign a DT or solicit team member nominations from the industry. The WSC shall approve the DT membership within 120 days of establishing a start date. The WSC may augment, modify, or replace DT membership at any time as needed.

Because the DT chair's primary responsibility is leadership and coordination, the DT chair need not be a SME in the field associated with the SAR.

Names of DT members will be posted on the WECC website.

#### **Step 4 –Begin Drafting Phase and Submit Draft to WSC**

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All DT meetings shall be open and publicly noticed on the WECC website.

The DT will begin working on the documents required by the SAR following assignment by the WSC. Notice of each DT meeting shall be dispatched via the SEL a minimum of 14 days prior to the meeting.

The author of the SAR may participate in the drafting process. The author of the SAR may be asked to provide additional information, supporting studies, and other information to support the requirements of the proposed RRS or CRT.

An RRS shall include those sections mandated by NERC, such as an applicability section, effective date, mandatory requirements, affected time horizons, measures, compliance, violation risk factors (VRF), and violation severity levels (VSL).

Each RRS shall promote at least one reliability principle and be consistent with all reliability principles and NERC market interface principles. Each RRS shall provide for as much uniformity as possible with Reliability Standards across the interconnected Bulk-Power System of the North American continent.

An RRS shall either:

- 1) be more stringent than a continent-wide reliability standard,
- 2) include a regional difference that addresses matters that the continent-wide reliability standard does not; or
- 3) be a regional difference necessitated by a physical difference in the Bulk-Power System.

An RRS or CRT may include a guidance section, background section, or other narrative sections; however, these sections are not required. Incorporation of extrinsic documents into an RRS or CRT should be avoided.

An RRS or CRT may include new definitions of terms that need to be added to the NERC or WECC glossary, respectively. Wherever possible, DTs are encouraged to use existing defined terms rather than create new defined terms.



In drafting the applicability section of an RRS, only functions in the NERC Compliance Registry will be used.

To avoid conflict of interest WECC, and its committees and subgroups, shall not be listed as the applicable entity in an RRS or CRT.

In the course of its assignment, the DT shall, at a minimum:

- review any preliminary technical assessment provided with the SAR;
- perform or request additional technical studies deemed necessary either by the DT or at the direction of the WSC;
- prepare supporting documents to support the RRS or CRT as needed; and
- request additional time from the WSC to develop the RRS or CRT, if necessary.

### **Step 5 – Post for Comment**

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On completion of each iterative draft of the RRS or CRT, WECC staff shall facilitate the posting of the draft RRS or CRT on the WECC website, along with supporting documents, if any, for a comment period of no less than 30 days for each posting, except as allowed in the Expedited Process for Urgent Action section of these Procedures.

An implementation plan shall be included in at least one iterative posting during the development of the RRS or CRT and shall be a part of the final record for consideration prior to ballot. (Interpretations do not require an implementation plan.)

A notice that the comment period has opened shall be distributed via the SEL. The notice shall include, at a minimum, the following information:

- identification of the RRS or CRT;
- what action is being taken (e.g., request for comment);
- the location of the document for review;
- how to submit comments or perform the requested action; and
- the opening and closing dates during which the solicited action shall take place. Unless otherwise posted, all posting periods close at 6:00 p.m. (Mountain).

WECC shall open a web portal to serve as the sole means of receiving comments on the RRS or CRT. Comments received via other media or received outside of the posted comment period will be accepted at the discretion of the DT. Comments may be submitted by any individual or entity, or a group of parties with a common comment.

To streamline the process, if a group of parties elects to submit a common comment, those parties are encouraged to submit that common comment only once and append to the comment the names of all those individuals, entities, or groups that are in support of the common position. DTs shall give due weight to such a joint comment.

The WSC shall monitor each posting and review the posted documents to ensure that the RRS or CRT:

- 1) remains within the scope of the SAR;
- 2) continues to be appropriate for development; and
- 3) meets any regulatory or policy-related directive including, but not limited to, adherence to these Procedures.

On a finding by a majority of the WSC members that the RRS or CRT does not meet one or more of the above three criteria, the WSC may:

- 1) adjust the scope of the SAR;
- 2) remand the work product to the DT with specific remedial direction;
- 3) exercise its right to augment, modify, or replace any or all of the DT members; or
- 4) exercise any combination of the above.

The WSC's rights and obligations specified in Step 5 terminate once a Ballot Pool is opened. The WSC retains the right to recommend that the Board not approve a specific RRS or CRT even though the project may subsequently be approved by the Ballot Pool.

## **Step 6 – Respond to Comments**

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The DT shall consider all comments submitted in accordance with these Procedures. If the same comment is provided more than once in a single posting, the DT may provide a single response to all comments that raise the same or a similar concern. If the same comment is received in iterative postings, the DT is not obligated to respond to comments previously addressed.

The DT shall prepare a response to comments received that includes reporting the changes made to the proposed RRS or CRT as a result of comments received, if any. The DT shall also report on comments that were rejected by the DT, in whole or in part, and the reason(s) the comments were rejected. The response to comments will be posted on the WECC website no later than the next posting of the proposed RRS or CRT.

The DT should target posting its responses to the WECC website no later than 30 days after the comment window has closed. If more than 30 days are required, the DT chair or WECC Staff should advise the WSC chair of the DT's progress and request additional assistance if needed.

All parties submitting comments are encouraged to participate in the DT meetings during which responses to their comments are considered and drafted.

### **Treatment of Substantive Changes**

All Substantive changes to an RRS or CRT require at least one posting / comment / response cycle.

If the DT determines that comments received during any posting warrant a Substantive Change to the language of an RRS or CRT, the DT shall consider each comment and redraft the RRS or CRT accordingly, repeating the posting / comment / response cycle as many times as needed to address Substantive Changes while staying within the scope of the SAR.

If at any time during the development process the DT determines that the scope of the SAR should be adjusted, the DT shall present that request to the WSC for disposition.

If at any time during the development process the DT determines that it has reached a developmental impasse, the DT shall present the issue to the WSC for disposition.

If comments received during any posting do not warrant a Substantive Change to the language of an RRS or CRT, the DT shall be polled at a regularly scheduled and announced DT meeting and asked whether the RRS or CRT should be forwarded to the WSC with a recommendation to ballot the document. If the DT affirms by a majority vote of those present that the RRS or CRT should be forwarded to the WSC with a recommendation for ballot, the document will be forwarded accordingly.

### **Treatment of Non-Substantive Changes**

Non-Substantive Changes do not require a posting / comment / response cycle.

Non-Substantive errors discovered prior to the opening of a WECC ballot on either an RRS or a CRT may be corrected by the WSC.

#### **Regional Reliability Standards**

If a Non-Substantive Change to an RRS is required at any time after a WECC ballot window opens, the proposed change shall be presented to the WSC with a request for approval. If the WSC agrees that the correction of the error does not change the scope or intent of the associated RRS, and agrees that the correction has no material impact on the applicable entities, then the correction shall be filed for approval with NERC and applicable governmental authorities as appropriate.

#### **WECC Regional Criteria**

If a Non-Substantive Change to a CRT is required at any time after a WECC ballot window opens, the proposed change shall be presented to the WSC with a request for approval. If the WSC agrees that the correction of the error does not change the scope or intent of the associated CRT, and agrees that the correction has no material impact on the applicable entities, the WSC shall approve the change and instruct WECC staff to make the change. No further action is required.

Changes to document styles and templates as adopted by WECC for CRTs and NERC for RRSs are explicitly within the purview of staff and do not require further approval.

## Step 7 – Submit Proposed Draft to the WSC with a Request for Ballot

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On completion, the DT shall present the proposed RRS or CRT to the WSC during a duly noticed WSC meeting with a request for balloting by a WECC Ballot Pool. The WSC shall address that request no later than its next duly noticed meeting.

After receiving a request for ballot, the WSC shall review the final draft of the RRS or CRT as presented and determine whether it fulfills the requirements stated in the SAR. The WSC shall also consider whether extrinsic requirements, such as FERC orders, Board directives, or other regulatory directives are met by the content of the document.

If the WSC concludes that the proposed RRS or CRT is ready for ballot, the WSC shall forward the draft document to WECC staff with a request that a Ballot Pool be formed from the Ballot Body, for the specific intent of seeking approval of the document.

The results of the WSC's vote to forward the RRS or CRT to the Ballot Pool shall be documented. Any WSC member that opposes submittal of the RRS or CRT will be encouraged to provide dissenting comments and, if possible, specific language that would make the document acceptable to the dissenting member. If the WSC cannot reach agreement to submit the draft document to the Ballot Pool, the WSC will report to and seek guidance from the Board.

If the WSC concludes that the proposed RRS or CRT is not ready for ballot because it does not fulfill the requirements of the SAR or because it fails to meet other regulatory requirements or directives, the WSC shall remand the RRS or CRT to the DT with a specific explanation identifying the deficiencies that must be remedied.

Upon receiving the remanded RRS or CRT and explanation of deficiencies, the DT shall:

- 1) Redraft the RRS or CRT accordingly;
- 2) Initiate iterative comment / response cycles as needed until it again concludes that no further Substantive Changes are needed; and
- 3) Return the proposed RRS or CRT to the WSC for disposition.

## Step 8 – Convene a Standards Briefing

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Once the WSC approves submitting the RRS or CRT to the Ballot Pool, WECC shall dispatch notice to the SEL that a Standards Briefing will be held to discuss the content of the proposed RRS or CRT prior to balloting. Notice shall be provided 14 days or more before the Standards Briefing is to be held and shall provide, at a minimum, the following:

- 1) Identification of the RRS or CRT;
- 2) The time and place of the Standards Briefing; and
- 3) The WECC website location of the proposed RRS or CRT and related documentation for review.

## Step 9 – Form the Ballot Pool and Ballot the Standard

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Any individual or entity seeking participation in the Ballot Pool of an RRS or CRT shall first apply to WECC for Ballot Body membership in any SVS in which it is eligible. WECC staff shall review the request and confirm eligibility to join the Ballot Body. Prior to confirmation of eligibility the application is considered pending. While an application is pending, the applicant cannot join a Ballot Pool.

Applications received less than five days prior to the opening of a Ballot Pool may not be considered for inclusion in that Ballot Pool.<sup>4</sup> Decisions of staff to deny the admission of an individual or entity to an SVS may be appealed in accordance Step 10 of these Procedures.

WECC staff shall require Ballot Body members to identify their Affiliates (as defined in the WECC Bylaws) who are also Ballot Body members. Affiliates within a single SVS may only have one vote in that SVS. Affiliates within a single SVS must designate a single Affiliate as the group's Ballot Pool member to vote in that SVS.

From the Ballot Body, a discrete Ballot Pool will be formed for each RRS or CRT to be balloted under these Procedures. All members of the Ballot Body shall be provided an opportunity to opt into a Ballot Pool formed for purposes of voting on each RRS or CRT. Once a Ballot Pool is established, an entity shall not be allowed to change the SVS(s) in which it has registered until balloting of the associated project has concluded. It is the Ballot Pool that votes on RRSs and CRTs developed under these Procedures.

Notice that a Ballot Pool is forming will be dispatched via the SEL and posted to the WECC website. That notice shall contain, at a minimum, the following information:

- 1) Identification of the RRS or CRT;
- 2) The proposed action to be taken (e.g., Notice of Ballot Pool Formation / Notice of Ballot);
- 3) When the Ballot Pool will open;
- 4) When the ballot will take place;
- 5) How to cast a vote; and
- 6) The WECC website location of the proposed RRS or CRT and related documents for review.

The Ballot Pool registration window shall remain open for a period determined by WECC staff, but in no case shall the Ballot Pool registration window be open less than 14 days or more than 60 days.

Once notice of a Ballot Pool forming has been dispatched, the ballot window shall commence no sooner than 14 days and no later than 45 days after that dispatch.

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<sup>4</sup> This period allows for review, confirmation, information technology functions, and the potentiality of holidays.

Once the ballot window opens, no Ballot Body member may join or withdraw from the Ballot Pool. The WECC Director of Standards has sole discretion to authorize deviations from this rule for good cause shown. Voting on an RRS or CRT shall be via electronic voting administered on the WECC website. The default voting window shall be a period of 14 days; however, the window may remain open up to a maximum of 60 days to reach a quorum. Additional Standards Briefings may be held as needed.

Eligible members of the Ballot Pool may cast one vote in each SVS for which they are eligible.

Negative votes will not be counted unless accompanied by a narrative explaining the reason for the negative vote. The statement should include language that would make the RRS or CRT acceptable. The statement will be included in the voting record for consideration by the WSC and the Board.

A two-thirds quorum of the Ballot Pool is required for each vote. Abstentions and negative votes cast without an explanation shall not be counted for the purpose of determining consensus, but will be counted for purposes of obtaining a quorum.

A weighted two-thirds affirmative fractional majority vote of the Ballot Pool is required for an RRS or CRT to be approved. Voting among the SVSs shall be weighted as follows:

For each SVS with 10 or more voters, the number of affirmative votes cast shall be divided by the sum of the affirmative votes plus the negative votes cast to determine the fractional affirmative vote for that SVS.

For each SVS with less than 10 voters, the same process shall be used to determine the fractional affirmative vote, but the fractional affirmative vote of that SVS shall be multiplied by 10 percent times the number of voters.

For example, for SVSs with nine voters, the fractional affirmative vote will be multiplied by 90 percent.

The sum of the fractional affirmative votes from all SVSs divided by the weighted number of SVSs voting shall be used to determine if a weighted two-thirds affirmative fractional majority vote has been achieved and whether the RRS or CRT has been approved. An SVS shall be considered as voting if any member of the SVS in the Ballot Pool casts either an affirmative or a negative vote. An RRS or CRT shall be deemed approved by the Ballot Pool if the sum of fractional affirmative votes from all SVSs divided by the weighted number of voting SVSs is a two-thirds affirmative fractional majority.

After a vote by the Ballot Pool, the WSC shall take one of the following actions.

If the Ballot Pool approves an RRS or CRT, the WSC shall submit the RRS or CRT to the Board with a request for disposition.

If the Ballot Pool rejects the RRS or CRT, the SAR shall be deemed complete and all associated documents shall be archived, except as allowed in the Regulatory Directive section of these Procedures.

### **Step 10 – Initiate the Appeals Process – If Needed**

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Any person may appeal the alleged non-adherence to any provision of these Procedures. The request for appeal, along with an explanation of the alleged grounds for appeal, must be submitted to the Director of Standards no later than 10 days after the alleged grounds for appeal arise. If the 10<sup>th</sup> day is not a WECC business day, the appeal must be submitted no later than the next WECC business day.

The WSC shall not schedule a project for Board approval until the window for submitting an appeal of the WSC's approval of the project has expired.

The Director of Standards will attempt resolution with the appellant. If resolution cannot be reached, the Director of Standards will forward the appeal to the WSC for disposition. The WSC's decision may be appealed to the Board. The Board's decision may not be appealed.

### **Step 11 – Obtain Board Approval**

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The WSC shall provide the Board with the RRS or CRT, associated supporting documents as needed, the final ballot results, and a summary of the rationale supporting any negative votes cast. The documents will be posted for Board review for at least the period mandated by the WECC Bylaws. The Board shall consider the RRS or CRT for approval no later than its next regularly scheduled meeting after presentation by the WSC with a request for approval.

Any person or entity may submit comments to the Board for the Board's consideration. The Board shall consider the full development record when making its decision.

If a CRT is approved by the Board, WECC shall post the final CRT on its website and the SAR will be deemed complete. The effective date will be that approved by the Board.

If an RRS is approved by the Board, WECC shall forward the RRS to NERC with a request for approval and subsequent regulatory disposition as needed.

If the RRS or CRT is rejected by the Board, the Board may either deem the SAR complete or remand the RRS or CRT to the DT with specific guidance as to proposed changes.

If the RRS or CRT is remanded, any Substantive Changes shall be vetted in accordance with these Procedures. Under no circumstances shall the Board make Substantive Changes to the RRS or CRT, except in accordance with the terms on Regulatory Directives set forth herein.

### **Step 12 – Submit for NERC and FERC Approval and Implementation**

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Note: Step 12 only applies to RRSs.

All new, revised, or retired RRSs shall be submitted to NERC and then FERC for approval. The approval, revision or retirement of an RRS shall not be effective in the United States until approved by FERC and shall not be effective in another jurisdiction until approved by the applicable governmental authority.

### Step 13 – Retire a CRT

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The WSC may retire all or a portion of a CRT on its own initiative and with no further due process on a finding that each of the following criteria has been met:

- 1) The substance of the document is addressed in a NERC Reliability Standard, other WECC Criteria, supporting WECC documents, or other regulatory document; and
- 2) Retirement of the CRT will not cause a reliability gap.

Proposed retirement of a CRT under this section shall be noticed to the SEL for no less than 14 days and vetted during at least one WSC meeting.

### Step 14 – Submit a Request for Interpretation

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A valid request for interpretation (RI) is one that requests additional clarity about one or more requirements in approved RRSs or CRTs, but does not request approval as to how to comply with one or more requirements. A valid RI response provides additional clarity about one or more requirements, but does not expand on any requirement and does not explain how to comply with any requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk-Power System may request an interpretation of any requirement in any RRS or CRT that has been adopted by the NERC Board of Trustees or the WECC Board, respectively. Interpretations will only be provided for currently effective documents or those that are approved and have a future effective date.

An RI may only seek to clarify or interpret the requirements of the affected document, including, if applicable, any attachment referenced in the requirement being clarified. No other elements of the affected document are subject to interpretation.

The entity requesting the interpretation shall submit a SAR, or its successor form, as provided on the WECC website. The RI shall explain the clarification required, the specific circumstances surrounding the request, and the impact of not having the interpretation provided. The WECC Standards Department shall review the RI to determine whether it meets the requirements for a valid interpretation. Based on this review, the WECC Standards Department shall make a recommendation to the WSC whether to accept the RI for development.

For example, an RI may be rejected where it:

- 1) Requests approval of a particular compliance approach;
- 2) Identifies a gap or perceived weakness in the approved RRS or CRT;
- 3) Can be addressed by an active standard drafting team;
- 4) Requests clarification of any element of an RRS or CRT other than a Requirement;
- 5) Asks a question has already been addressed in the record;
- 6) Identifies an issue and proposes the development of a new or modified RRS or CRT, (such issues should be addressed via submission of a SAR);



- 7) Seeks to expand the scope of an RRS or CRT; or
- 8) The meaning of an RRS or CRT is plain on its face.

If the WSC rejects the RI, it shall provide a written explanation for rejecting the interpretation to the requesting entity within 10 days of the decision to reject. If the WSC accepts the interpretation request, the WSC shall assemble an interpretation drafting team (IDT) to address the request.

Development of the interpretation shall follow the same steps as those for developing an RRS or CRT, with the following exceptions:

- The chair of the WSC shall either assign members of the original DT or solicit nominees for an IDT for approval by the WSC, or both. The IDT shall be composed of SMEs with relevant expertise to address the clarification and, to the extent practical, should include members of the original DT. The IDT shall not include any person representing the entity that filed the RI; however, this prohibition does not preclude representatives of the filing entity from participating in the development process.
- Once an interpretation has been approved by the Board, the interpretation shall be appended to the interpreted document. For an RRS, the interpretation shall be submitted to NERC for NERC and FERC approval.
- The interpretation will remain appended to the interpreted document until such time as the document is revised and the interpretation's content can be addressed during the revision process. RRS interpretations shall not be effective in the United States until approved by FERC and shall not be effective in other jurisdictions until approval by the applicable governmental authority.
- If, during its deliberations, the IDT identifies a reliability gap in the affected document, the IDT shall notify the WSC of its conclusion and may submit a SAR with the proposed modification to the affected document at the same time it provides its proposed interpretation.

## Supporting Processes

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### Expedited Process for Urgent Action

In cases requiring urgent action, such as in the development of emergency procedures, any person or entity may propose an interim RRS or CRT for approval by the WECC Board. The RRS or CRT may go through a process that eliminates any or all of the steps outlined previously, but only to the extent deemed necessary by the Board and only in a manner that is consistent with the WECC Bylaws.

If the Board approves the interim document, it shall establish an initial effective date for the interim document.

Within 90 days after the initial effective date of the document, the Board shall either:

- 1) Cause a SAR to be submitted requesting the development under these Procedures of a permanent replacement to the interim document; or
- 2) Shall extend the applicability of the interim document for an additional 90 days.

The extension can be renewed more than once, but a good faith effort must be made to develop a permanent replacement under these Procedures.

If a SAR is submitted, the interim RRS or CRT shall remain in effect until the permanent replacement RRS or CRT becomes effective.

If a SAR is not submitted and the interim RRS or CRT has not been extended, the interim RRS or CRT shall be deemed retired.

### **Regulatory Directives**

These Procedures acknowledge that FERC may order WECC to make specified regulatory changes to documents created under these Procedures. For the purpose of this section only, those documents are referred to as Directive Regional Reliability Standards (DRRS).

If the Board determines that these Procedures failed to result in a DRRS meeting the mandated regulatory changes, the Board shall have authority to take the following actions to ensure that the DRRS is responsive to the regulatory directive.

1. If the Ballot Pool approves a DRRS that does not address a regulatory directive required to be included in that document, the Board may remand the DRRS to the original DT or instruct the WSC to convene a new or augmented DT to redraft the document. The Board shall instruct the DT on the specific regulatory directive that must be contained in the redraft. Once the DRRS is redrafted it shall be reprocessed under these Procedures.
2. If the Ballot Pool rejects a DRRS or fails to ballot the DRRS due to failure to reach a quorum, either when first presented for ballot or during an iterative redraft as instructed by the Board, the Board shall review the DRRS, including all comments provided and all rationale accompanying any negative vote.
  - Upon a finding that the DRRS was rejected for reasons not related to the regulatory directive, the Board may direct WECC staff to file a new SAR with the specific narrow scope of addressing only the regulatory directive. The Board may suggest specific language for inclusion in the proposed DRRS.
  - Upon a finding that the DRRS was rejected based on language addressing the regulatory directive, the Board shall take the following steps to meet its regulatory obligation:
    - 1) Review the entire record of development.
    - 2) Require a public technical conference to be noticed and convened to determine

whether the rejected DRRS is:

- just and reasonable;
- not unduly discriminatory or preferential;
- in the public interest;
- helpful to reliability;
- practical;
- technically sound;
- technically feasible;
- cost-justified; and,
- meeting the regulatory directive.

3) Determine whether the DRRS should be implemented as drafted, notwithstanding rejection by the Ballot Pool.

- Upon a finding that the rejected DRRS should be implemented, the Board shall approve the DRRS and direct that it be submitted for NERC and FERC approval, as required.
- Upon a finding that the rejected DRRS should not be implemented, the Board may submit the DRRS and its record of development as a regulatory compliance filing in response to the regulatory directive. The filing shall include a recommendation that the DRRS not be made effective and an explanation of the basis for that recommendation.

### **Maintenance of the Procedures**

The WSC is charged with maintenance of these Procedures. Proposed changes to these Procedures shall first be brought to the WSC for consideration. The WSC may initiate proposed changes on its own initiative.

If the WSC determines that a change to these Procedures should be pursued, the WSC shall draft the proposed changes and post the proposed changes to the WECC website for comment, accompanied by a notice to the SEL soliciting comments on the proposed changes.

The WSC shall consider all comments received and shall redraft the proposed changes as it deems necessary. Once the WSC approves the proposed changes, those changes shall be submitted to the Board for approval, subject to the WSC's continuing right to withdraw that request until such time as the Board approves that request. Changes to these Procedures approved by the Board shall be submitted to NERC for NERC and FERC approval.

### **Maintenance of RRSs and CRTs**

The WSC shall ensure that each RRS and each CRT is reviewed at least once every five years from the effective date of the most recent version of the document under review. If the review identifies needed changes, the WSC shall cause a remedial SAR to be filed. If the review does not identify needed changes, no further action is required.

**Field Tests**

WECC will follow a process for field tests or collection and analysis of data to validate concepts, that is similar to the process identified in the NERC Standards Processes Manual, as may be amended.

Approval for a WECC field test shall be obtained from the WSC with consultation from WECC subject-matter experts, as needed. Approval is neither required from NERC nor is there a requirement to consult NERC subject-matter experts.

When a temporary waiver from compliance with either an RRS or a CRT is requested, WECC shall coordinate the test with the appropriate NERC and WECC compliance sections, respectively, before the test begins.