**Unofficial Comment Form**Interpretation of Regional Reliability Standard  
TOP-007-WECC-1

Please **DO NOT** use this form. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=8924b1abc24e44f2bbae0ef363e3b51e) to submit comments on the Interpretation of Regional Reliability Standard TOP-007-WECC-1. Comments must be submitted by **October 29, 2013.** If you have questions please contact Howard Gugel at [howard.gugel@nerc.net](mailto:howard.gugel@nerc.net) or Stephen Eldridge at [stephen.eldridge@nerc.net](mailto:stephen.eldridge@nerc.net).

<http://www.nerc.com/pa/Stand/Pages/RegionalReliabilityStandardsUnderDevelopment.aspx>

**Background Information**

On February 8, 2013, Arizona Public Service (APS) filed WECC-0010 Request for Interpretation (Request) with Western Electricity Coordinating Council (WECC). The Request is specific to TOP-007-WECC-1, System Operating Limits; Requirement R1. TOP-007-WECC-1 is a Regional Reliability Standard that is applicable only in the Western Interconnection. The WECC Standards Committee assigned the original TOP-007-WECC-1 Drafting Team to prepare the interpretation.

The approval process for a Regional Reliability Standard requires NERC to publicly notice and request comment on the proposed Standard. Similar criteria are used for proposed Interpretations of Regional Reliability Standards. Comments are only solicited on the following criteria (technical aspects of the Interpretation are vetted through the applicable regional standards development process):

**Unfair or Closed Process —** The Regional Reliability Standard 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 Regional Reliability Standard would have a significant adverse impact on reliability or commerce in other interconnections.

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

**Questions**

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

1. **Do you agree the proposed interpretation was developed in a fair and open process, using the WECC *Process for Developing and Approving WECC Standards*?**

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

1. **Does the proposed interpretation pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?**

Yes

No

Comments: