Individual or group. (4 Responses)
Name (3 Responses)
Organization (3 Responses)
Group Name (1 Responses)
Lead Contact (1 Responses)
Question 1 (4 Responses)
Question 1 Comments (4 Responses)
Question 2 (4 Responses)
Question 2 Comments (4 Responses)
Question 3 (4 Responses)
Question 3 Comments (4 Responses)
Question 4 (4 Responses)
Question 4 Comments (4 Responses)

Group	
PacifiCorp	
Kelly Cumiskey	
Yes	
No	
No	
No	
Individual	
Alice Ireland	
Xcel Energy	
Yes	

PSCo agrees that the process was fair and open. However, PSCo believes that the proposed interpretation goes beyond the allowed limits of an interpretation. PSCo commented in the WECC ballot that based on the current paradigm of path operator's roles and operations in WECC, the Interpretation would in fact expand the scope of responsibility from the TOP who is the Path Operator to all TOPs who have a share of a Path. This interpretation essential negates the role/responsibility of the path operator and implies that the RC would have to now contact all TOPs with shares of the path and coordinate mitigating actions with all TOPs sharing in the path. Additionally, it is not clear what responsibilities and liabilities a TOP of an element on an overloaded path would have if their scheduled flows were zero or not over their allocated amount and none of their facilities in the path were overloaded. The issue is being worked on by a WECC Task Force of experts from the industry. The WECC Path Operator Task Force is addressing the preceding issues and we look forward to their recommendations. We feel that developing the Path Operator as part of the NERC Functional Model is the best long term approach. Approving the proposed interpretation will complicate matters as cited above and will do little if anything to solve the issues.

No	
No	
No	
ndividual	
Dave Willis	
daho Power Co.	
/es	
No	
No	
No	
ndividual	
Chris Mattson	
Tacoma Power	
/es	
No	
No	
No	