

Comment Report

Project Name: MRO Regional Reliability Standards Development Procedure
Comment Period Start Date: 4/21/2021
Comment Period End Date: 6/4/2021
Associated Ballots:

There were 4 sets of responses, including comments from approximately 4 different people from approximately 4 companies representing 4 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree the revised *MRO RRSPM* continues to meet the “Open” criteria as outlined above? If “No”, please explain in the comment area below.
2. Do you agree the revised *MRO RRSPM* continues to meet the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below.
3. Do you agree the revised *MRO RRSPM* continues to meet the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below.
4. Do you agree the revised *MRO RRSPM* continues to meet the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below.
5. Do you agree the revised *MRO RRSPM* continues to meet the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below.

1. Do you agree the revised *MRO RRSPM* continues to meet the “Open” criteria as outlined above? If “No”, please explain in the comment area below.

Thomas Foltz - AEP - 3,5,6

Answer Yes

Document Name

Comment

AEP finds nothing objectionable regarding provisions for “open criteria” within the edits provided in the current draft, but we would like to offer a few general suggestions for consideration regarding MRO’s Regional Reliability Standards Process. We hope these suggestions might further promote the openness inherent in MRO’s current process.

While MRO’s ballot body may not currently be active, it would be helpful if the MRO website had a single webpage which listed the name of every individual officially registered for MRO’s ballot body and the segment they represent. This would allow industry to see at any given time exactly who is registered, as well as the entity and industry segment they each represent. Contact information need not (and probably *should* not) be provided.

While there is presumably no regional standards development activity currently underway within the MRO footprint, this will not always be the case. When that activity resumes again, many from industry will not have participated in MRO commenting and balloting for quite some time, while others will have never previously done so at all. It may be worth considering, before MRO regional standards are once again either revised or developed, for MRO to provide informal training or presentations on the overall commenting and balloting process.

Before MRO regional standards are once again revised or developed, we believe it would be beneficial for an outreach to be conducted regarding the MRO ballot body itself, not only reaching out to those who were in it previously, but also to industry in general to allow individuals to petition to join the RBB as new members. We believe it would be preferable to do so well in advance of actual efforts related to MRO regional standards development.

Likes 0

Dislikes 0

Response

Thank you for your comments. As MRO does not anticipate development of a regional standard in the foreseeable future, MRO maintains that developing a Registered Ballot Body at this time as this would create an undue burden on the stakeholders to register and maintain the ballot body. If there is a regional standard being developed in the future, we will ensure that the necessary outreach and training is conducted

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

Donna Wood - Tri-State G and T Association, Inc. - 1,3,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

2. Do you agree the revised *MRO RRSPM* continues to meet the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below.

Donna Wood - Tri-State G and T Association, Inc. - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

3. Do you agree the revised *MRO RRSPM* continues to meet the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below.

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

Donna Wood - Tri-State G and T Association, Inc. - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

4. Do you agree the revised *MRO RRSPM* continues to meet the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below.

Donna Wood - Tri-State G and T Association, Inc. - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

5. Do you agree the revised *MRO RRSPM* continues to meet the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below.

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you

Donna Wood - Tri-State G and T Association, Inc. - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you