

## Consideration of Comments

<b>Project Name:</b>	Regional Reliability Standard (WECC)   Revised Retirement Date of PRC-004-WECC-2
Comment Period Start Date:	12/7/2018
Comment Period End Date:	1/22/2019
Associated Ballots:	

There were 6 sets of responses, including comments from approximately 10 different people from approximately 7 companies representing 4 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Senior Director of Standards and Education, [Howard Gugel](#) (via email) or at (404) 446-9693.

If you have any questions regarding the WECC Reliability Standards Development Procedures or this project, please contact WECC Consultant, [W. Shannon Black](#) at (503) 307-5782.

## Questions

1. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Open” criteria as outlined above? If not, please explain in the comment area below:

2. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:

3. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:

4. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:

5. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Portland General Electric Co.	Daniel Mason	1,3,5,6		PGE FCD	Ryan Olson	Portland General Electric Co.	5	WECC
					Nathaniel Clague	Portland General Electric Co.	1	WECC
					Angela Gaines	Portland General Electric Co.	3	WECC
					Daniel Mason	Portland General Electric	6	WECC

**1. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:**

**Daniel Mason - Portland General Electric Co. - 1,3,5,6, Group Name PGE FCD**

**Answer** No

**Document Name**

**Comment**

All five questions on this comment form reference criteria "above" which have not been provided on the comment form.

PGE does though support the retirement of PRC-004-WECC-2 and the revised retirement date to coordinate its retirement with the effective date of PRC-012-2.

Likes 0

Dislikes 0

**Response**

The WECC-0136 Drafting Team appreciates PGE’s observation regarding the “above” reference. The drafting team has forwarded your observation to NERC Standards personnel with a request to review the online form for greater clarity.

The “above” reference is language imported directly from the Word version of the NERC Comment Form. The Word version is located at the far-right column of each regional project posted for comment on NERC’s Regional Reliability Standards Under development page.<sup>1</sup> On that form, the user will find the criteria for: 1) open, 2) inclusive, 3) due process, 4) balanced, and 5) transparent.

<sup>1</sup> <https://www.nerc.com/pa/Stand/Pages/RegionalReliabilityStandardsUnderDevelopment.aspx>

In the context of that criteria, the commenter can see that the 45-day comment period at NERC is designed to ensure that each region adhered to its standards development processes. Each process is designed to address substantive issue before the project is presented for NERC procedural review.

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** No

**Document Name**

**Comment**

Extending the retirement effective date perpetuates a merely administrative burden. The additional tracking and reporting requirements mandated by PRC-004-WECC-2 result in expenditures of ratepayer funds. WECC ratepayers would be better served by honoring the original retirement date for this standard.

Likes 0

Dislikes 0

**Response**

The WECC-0136 drafting team appreciates the United States Bureau of Reclamation’s (USBR) comment. Please refer to team’s response to PGE, located above. During all stages of the WECC-0136 standard development process, WECC adhered to the WECC Reliability Standards Development Procedures that include, but are not limited to, procedural attributes to ensure: 1) openness, 2) inclusiveness, 3) due process, 4) balance, and 5) transparency.

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes	0
<b>Response</b>	
The drafting team appreciates Bonneville Power Administration’s continued involvement in the standards development process.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates Black Hills Corporation’s continued involvement in the standards development process.	
<b>Kevin Salsbury - Berkshire Hathaway - NV Energy – 5</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates NV Energy’s continued involvement in the standards development process.	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6</b>	
Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
The drafting team appreciates PacifiCorp's continued involvement in the standards development process.	

**2. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

The drafting team appreciates Bonneville Power Administration’s continued involvement in the standards development process.

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp – 6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

The drafting team appreciates PacifiCorp’s continued involvement in the standards development process.

**Kevin Salsbury - Berkshire Hathaway - NV Energy - 5**



<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
The drafting team appreciates NV Energy’s continued involvement in the standards development process.	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1,5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
The drafting team appreciates the United States Bureau of Reclamation’s continued involvement in the standards development process.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes 0

**Response**

The drafting team appreciates Black Hills Corporation's continued involvement in the standards development process.

**3. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** No

**Document Name**

**Comment**

The lengthy extension of the proposed retirement date of PRC-004-WECC-2 does not meet the criteria for “balanced” because the proposal was driven by interests contrary to the original interests driving Project WECC-0126; i.e., reducing redundancy and administrative compliance burdens. The SDT did not place proper emphasis on the true impact of Project WECC-0136; i.e., the **continuation** of redundancies and administrative burdens for multiple additional years. Further, the detrimental nature of the continued redundant and administrative compliance burdens was minimized by the Drafting Team consisting solely of WECC Standards Department personnel, rather than involving industry representatives to fully acknowledge and assess the impacts of the delayed retirement on the industry.

Likes 0

Dislikes 0

**Response**

The WECC-0136 DT appreciates the United States Bureau of Reclamation’s (USBR) concerns. Please refer to the above responses provided to PGE and USBR.

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 – WECC**

**Answer** Yes

**Document Name**

**Comment**

None

Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates Bonneville Power Administration’s continued involvement in the standards development process.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
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Answer	Yes
Document Name	
<b>Comment</b>	
Likes	0
Dislikes	0
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<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
The drafting team appreciates PacifiCorp’s continued involvement in the standards development process.	

**4. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** No

**Document Name**

**Comment**

The proposed lengthy extension of the retirement effective date does not meet the criteria for “due process.” The reliability concern for which the original standard was drafted is no longer relieved by the lengthy extension of the retirement date. Rather, extending the retirement date perpetuates the redundancies committed by the original standard and does not offer timely relief from administrative compliance burdens that do not improve BES reliability.

Likes 0

Dislikes 0

**Response**

The WECC-0136 DT appreciates the United States Bureau of Reclamation’s (USBR) concerns. Please refer to the above responses provided to PGE and USBR.

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 – WECC**

**Answer** Yes

**Document Name**

**Comment**

None

Likes 0

Dislikes	0
<b>Response</b>	
The drafting team appreciates Bonneville Power Administration’s continued involvement in the standards development process.	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp – 6</b>	
Answer	Yes
Document Name	
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Answer	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
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**5. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** No

**Document Name**

**Comment**

The lengthy extension of the retirement date of this redundant and administrative standard was not transparently presented for industry review. The extensive emphasis on the “alignment of the retirement date” with the future effective date of PRC-012-2 distracted from the true impact of perpetuated compliance with redundant and administrative requirements.

In general, Reclamation supports alignment throughout the nationwide and regional standards; however, the lack of industry interest in Posting 1 of Project WECC-0136 indicates a general misunderstanding of the proposal’s impact. Five entities commented in support of the WECC-0126 immediate retirement proposal, yet only one entity commented on the WECC-0136 alignment proposal to extend the retirement date. Rather than emphasizing lack of immediate relief from the redundancies and administrative burdens originally relieved by Project WECC-0126, the continued requirement for entities to comply with redundant and administrative requirements for additional years was presented as “alignment” under Project WECC-0136, thereby failing to draw proper negative attention from industry during previous substantive comment periods.

Likes 0

Dislikes 0

**Response**

The WECC-0136 DT appreciates the United States Bureau of Reclamation’s (USBR) concerns. Please refer to the above responses provided to PGE and USBR.

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
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<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
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<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes	0
<b>Response</b>	
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<b>Answer</b>	Yes
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