

Comment Report

Project Name: Regional Reliability Standard (WECC) | FAC-501-WECC-3
Comment Period Start Date: 1/26/2022
Comment Period End Date: 3/11/2022
Associated Ballots:

There were 10 sets of responses, including comments from approximately 12 different people from approximately 11 companies representing 6 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree the proposed Regional Reliability Standard was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?
2. Does the proposed Regional Reliability Standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?
3. Does the proposed Regional Reliability Standard pose a serious and substantial threat to public health, safety, welfare, or national security?
4. Does the proposed Regional Reliability Standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?
5. Does the proposed Regional Reliability Standard meet at least one of the following criteria?
 - The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.
 - The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.
 - The proposed regional difference is necessitated by a physical difference in the Bulk Power System.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Alan Wahlstrom	Southwest Power Pool Inc.	2	WECC

1. Do you agree the proposed Regional Reliability Standard was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

Answer Yes

Document Name

Comment

No comments.

Likes 0

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1,4,5

Answer Yes

Document Name

Comment

No designation as to yes or no. Insufficient information to conclude one way or another, a comment period was provided for the proposed changes by NERC. Feedback regarding consideration of comments provided is expected.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Turk - Avista - Avista Corporation - NA - Not Applicable - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Malon - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

Answer

Document Name

Comment

Hydro-Quebec Production as GO/GOP at NPCC has no comments.

Likes 0

Dislikes 0

Response

2. Does the proposed Regional Reliability Standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

Answer No

Document Name

Comment

No comments.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jennifer Malon - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1,3,5	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jessica Turk - Avista - Avista Corporation - NA - Not Applicable - WECC	
Answer	No
Document Name	
Comment	
Likes	0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1,4,5

Answer Yes

Document Name

Comment

The adverse impact to reliability and commercial operation is taking additional time away from SMEs (that could otherwise be spent on entity reliability projects), to categorize and discuss the new proposed categories in Attachment A Section 2 Maintenance. I expect utilities to continue with their existing work practices. There appears to be redundant categories with the proposed two additional categories in Attachment A Section 2 Maintenance.

As it applies to Section C, M3 1.2, language and specificity is very important in interpreting applicability in which to achieve the intended and desired results being set forth in FAC-501. There is potential variation in interpretation of the proposed language. I provided a suggested edit I believe provides additional clarity.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

Answer

Document Name

Comment

Hydro-Quebec Production as GO/GOP at NPCC has no comments.

Likes 0

Dislikes 0

Response

3. Does the proposed Regional Reliability Standard pose a serious and substantial threat to public health, safety, welfare, or national security

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

Answer No

Document Name

Comment

No comments.

Likes 0

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1,4,5

Answer No

Document Name

Comment

No. However, one could argue the reduction in time spent addressing reliability issues, increases the probability for a non-desired event occurring on the BES. Compliance and reliability are not the same thing. Compliance in an internal control mechanism to document business decisions and work practices to give EROs, NERC, and FERC assurance the utility is following good work practices to prevent and/or limit impacts that occur due to an event on the BES.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Turk - Avista - Avista Corporation - NA - Not Applicable - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Malon - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

Answer

Document Name

Comment

Hydro-Quebec Production as GO/GOP at NPCC has no comments.

Likes 0

Dislikes 0

Response

4. Does the proposed Regional Reliability Standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

Answer No

Document Name

Comment

No comments.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jennifer Malon - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1,3,5	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jessica Turk - Avista - Avista Corporation - NA - Not Applicable - WECC	
Answer	No
Document Name	
Comment	
Likes	0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1,4,5

Answer Yes

Document Name

Comment

Yes, time and resources impact the operating budgets and staff time burden in competitive markets. The new proposed language (added categories) could add additional burden in determining which category a maintenance methodology/work practice falls in to. The new categories potentially introduce inconsistencies across utilities, for a same/similar maintenance methodology/work practice, which would require additional correspondence with EROs about which category to define the Utility's maintenance methodology/work practices fall in to. This would lead to additional burden on EROs to implement. As it applies to Attachment A, Section 2 Maintenance, the proposed added categories are redundant and can be combined. Recommend providing greater specificity/guidance in the existing categories, i.e.:

1. OEM manufacture based maintenance would fall under the time based approach.
2. Condition Based (a combo of health assessment and the way in which the equipment is operated) is the same as risk based, consider combining versus a separate method, if there is a desire to provide parameters of what defines condition based maintenance then put the specifics under the condition based category section.

Again, as it applies to Section C, M3 1.2, language and specificity is very important in interpreting applicability in which to achieve the intended and desired results being set forth in NERC FAC-501. There is potential variation in interpretation of the proposed language. I provided a suggested edit I believe provides additional clarity.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Qu?bec Production - 1,5

Answer	
Document Name	
Comment	
	Hydro-Quebec Production as GO/GOP at NPCC has no comments.
Likes 0	
Dislikes 0	
Response	

5. Does the proposed Regional Reliability Standard meet at least one of the following criteria?

- The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.
- The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.
- The proposed regional difference is necessitated by a physical difference in the Bulk Power System.

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

Answer Yes

Document Name

Comment

No comments.

Likes 0

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1,4,5

Answer Yes

Document Name

Comment

- The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Turk - Avista - Avista Corporation - NA - Not Applicable - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Malon - Black Hills Corporation - 1,3,5,6 - MRO,WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 1,5

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Document Name

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Likes 0

Dislikes 0

Response

