



**Response to Comments
Posting 1—45-Day at NERC
August 16 through September 29, 2023**

**WECC-0148 VAR-501-WECC-4
Power System Stabilizer
Information Only Filing**

Posting 1—45-Day NERC

The WECC-0148 VAR-501-WECC-4, Power System Stabilizer Drafting Team (DT) thanks everyone who submitted comments on the proposed project. WECC-0148 is an information-only filing proposing no Substantive changes.¹

Posting

This project was posted for comment by NERC from August 16, 2023, through September 29, 2023.

NERC distributed notice for the posting on August 16, 2023.

NERC asked stakeholders to provide feedback on the proposed project through a standardized electronic template.

NERC reported there “were 9 sets of responses, including comments from approximately 14 different people from approximately 9 companies representing 4 of the Industry Segments.”

After review of the NERC-provided document, WECC found responses from seven organizations (some with member organization subcomponents), and 13 persons identified in the following Table of Respondents.

Location of Comments

All comments provided to WECC by NERC can be reviewed in their original format on the WECC-0148 project page under the “Submit and Review Comments” accordion.

Changes in Response to Comment

After consideration of all comments received, no further changes were made to this project.

¹ The terms Substantive and Non-Substantive are defined terms found in the WECC Reliability Standards Development Procedures.

<https://www.wecc.org/Reliability/WECC%20Reliability%20Standards%20Development%20Procedures%20-%20FERC%20Approved%2009-13-2021.pdf>

WECC-0148 NERC 45-Day Posting Response to Comments, Posting 1

Minority View

No minority views were raised.

Proposed Effective Date

The proposed Standard can be implemented immediately upon receipt of final regulatory approval.

Information Only—No Substantive Changes

This project represents an “Information Only” filing with no Substantive changes.

Per the WECC Reliability Standards Development Procedures (Procedures), if no Substantive changes are requested to a Regional Standard, no further due process is required. Specifically, WECC Board of Directors (Board) approval is not required.

On July 11, 2022, a list² of proposed Non-Substantive changes was distributed to the Standards Email List (SEL) inviting comments or concerns to be forwarded to WECC Standards staff. A redline and a clean version of the project was posted on the WECC-0148, Posting 1 for Comment accordion. No comments were received.

On July 16, 2022, WECC posted a letter³ to the WSC informing the WSC of its scope and authority to address an information only filing. The letter was published to the WECC-0148 home page on the Posting 1 for Comment accordion.

On December 6, 2022, during a duly noticed WSC meeting, the WSC reviewed the letter from July 16, 2022, and was briefed on the WSC’s Procedural authority to approve the project with no further due process, so long as all changes were deemed Non-Substantive.

The WSC concurred⁴ that all proposed changes were Non-Substantive. Because the proposed changes are all Non-Substantive, the WSC also concurred that neither a posting for comment, ballot, Board approval, nor an Implementation Plan were required per the Procedures.

Table of Respondents

	Organization	
1	ACES Power Marketing (ACES)	Bob Soloman, Jodirah Green, Kris Carper
2	Arizona Public Service Company (APS)	Daniel Atanasovski
3	Avista Corporation	Glen Farmer, Mike Magruder, Robert Follini

² <https://www.wecc.org/Administrative/WECC-0148%20Notice%20of%20No%20Substantive%20Change.pdf>

³ <https://www.wecc.org/Reliability/WECC-0148%20VAR-501-WECC-3.1%20-%20Letter%20to%20WSC%20Requesting%20Information%20Only%20Filing%20-%20FINAL.docx>

⁴ <https://www.wecc.org/Administrative/2022-03-16%20WSC%20Proposed%20Meeting%20Minutes%20for%20approval%202022-12-06-2022%20-%20FINAL%20FROM%20TECH.docx>



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	Organization	
4	BC Hydro and Power Authority (BC)	Adrian Andreoiu, Helen Hamilton Harding, Hootan Jarollahi
5	Bonneville Power Administration (BPA)	Andrea Jessup
6	Salt River Project (SRP)	Israel Perez
7	United States Bureau of Reclamation (USB)	Richard Jackson

Contacts and Appeals

If you feel your comment has been omitted or overlooked, please contact [W. Shannon Black](#), WECC Consultant, at (503) 307-5782. In addition, there is a WECC Reliability Standards appeals process.

Final from Tech



Index to NERC-provided Questions, Comments, and Responses

Question

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

**WECC-0148 NERC 45-Day Posting
Response to Comments, Posting 1**

Commenter		Comment or Response
ACES		Yes
Response		
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.		
Commenter		Comment or Response
APS		Yes
Response		
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.		
Commenter		Comment or Response
Avista – Glen Farmer		Yes
Response		
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.		
Commenter		Comment or Response
Avista - Mike Magruder		Yes
Response		
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.		
Commenter		Comment or Response
Avista - Robert Follini		Yes
Response		
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.		
Commenter		Comment or Response
BC		Yes
Response		



**WECC-0148 NERC 45-Day Posting
Response to Comments, Posting 1**

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
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BPA	Yes
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Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
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SRP	Yes
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Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
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USB	Yes
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Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Final from



**WECC-0148 NERC 45-Day Posting
Response to Comments, Posting 1**

Comment Summary. For proposed changes and avenues forward, please see the preamble.

1) *Question 2*— Does the proposed Regional Reliability Standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

Commenter	Comment or Response
ACES	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
APS	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista – Glen Farmer	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista - Mike Magruder	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista - Robert Follini	No
Response	



WECC-0148 NERC 45-Day Posting Response to Comments, Posting 1

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
BC	No

Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
BPA	No

Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
SRP	No

Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
USB	No

Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.



**WECC-0148 NERC 45-Day Posting
Response to Comments, Posting 1**

Comment Summary. For proposed changes and avenues forward, please see the preamble.	
1) <i>Question 3</i> — Does the proposed Regional Reliability Standard pose a serious and substantial threat to public health, safety, welfare, or national security?	
Commenter	Comment or Response
ACES	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
APS	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista – Glen Farmer	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista - Mike Magruder	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista - Robert Follini	No
Response	



WECC-0148 NERC 45-Day Posting Response to Comments, Posting 1

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
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BC	No
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Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
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BPA	No
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Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
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SRP	No
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Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.

Commenter	Comment or Response
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USB	No
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Response

The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.



**WECC-0148 NERC 45-Day Posting
Response to Comments, Posting 1**

Comment Summary. For proposed changes and avenues forward, please see the preamble.

- 1) *Question 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?

Commenter	Comment or Response
ACES	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
APS	No.
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista – Glen Farmer	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista - Mike Magruder	No
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista - Robert Follini	No
Response	



WECC-0148 NERC 45-Day Posting Response to Comments, Posting 1

The WECC-0148 Drafting Team (DT) appreciates each respondent's engagement in the Standards development process.

Commenter	Comment or Response
BC	No

Response

The WECC-0148 Drafting Team (DT) appreciates each respondent's engagement in the Standards development process.

Commenter	Comment or Response
BPA	No

Response

The WECC-0148 Drafting Team (DT) appreciates each respondent's engagement in the Standards development process.

Commenter	Comment or Response
SRP	No

Response

The WECC-0148 Drafting Team (DT) appreciates each respondent's engagement in the Standards development process.

Commenter	Comment or Response
USB	No

Response

The WECC-0148 Drafting Team (DT) appreciates each respondent's engagement in the Standards development process.



**WECC-0148 NERC 45-Day Posting
Response to Comments, Posting 1**

Comment Summary. For proposed changes and avenues forward, please see the preamble.

1) Question 5—Does the proposed Regional Reliability Standard meet at least one of the following criteria:

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

Commenter	Comment or Response
ACES	Yes. Thank you for the opportunity to comment.
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
APS	Yes
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
Avista – Glen Farmer	No
Response	
The WECC-0148 Drafting Team (DT) appreciates Avista’s negative response; however, Avista has failed to explain their response, identify any issues, or suggest any proposed changes. As such, the DT can neither identify nor remedy Avista’s concern.	
Commenter	Comment or Response
Avista - Mike Magruder	No
Response	
The WECC-0148 Drafting Team (DT) appreciates Avista’s negative response; however, Avista has failed to explain their response, identify any issues, or suggest any proposed changes. As such, the DT can neither identify nor remedy Avista’s concern.	
Commenter	Comment or Response
Avista - Robert Follini	No
Response	



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The WECC-0148 Drafting Team (DT) appreciates Avista’s negative response; however, Avista has failed to explain their response, identify any issues, or suggest any proposed changes. As such, the DT can neither identify nor remedy Avista’s concern.	
Commenter	Comment or Response
BC	Yes
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
BPA	Yes
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
SRP	Yes. While there are regional and physical differences, the changes proposed are mainly grammatical and all are minor.
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	
Commenter	Comment or Response
USB	Yes
Response	
The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process.	