

Hello

On behalf of BPA's WECC member representatives, BPA is submitting the following comments for the UDSA/WIDSA Sessions Policy Revisions. Some terminology and organization of the policy is a bit confusing. BPA suggests the following:

1. For section 2.1, BPA recommends numbering each of the different sections (e.g. A, B, C) so that it's easier to refer to. As it is now, it would be very difficult to cite which section of 2.1 someone is specifically referring to since it uses the same numbering without delineating specific sections.
2. In 2.2.1 (1), it is not clear who determines if the discussion or analysis is for "reliability purposes". Since WECC committees generally have reliability as a core part of their reason for existing, it feels like any committee could meet this requirement under a broad interpretation.
3. BPA is not sure if there is a difference between "General Counsel" and "WECC Legal Counsel." BPA would think all WECC Legal Counsel is organized under the General Counsel. Also, under section 2.1(3)(B) (the third "3" under this section, see previous point) uses the term "Legal Department." See specifically section 2.2(1), the "General Counsel" must approve the scope but questions regarding the scope of approval should be directed to "WECC Legal Counsel." BPA assumes all these terms are generally interchangeable and recommends using the same term.

Please let us know if you need additional clarification regarding the above.

Thank you!