# Minority Issues—WECC-0141

Before receiving separate 100%-affirmative ballots on WECC-0141 and WECC-0149, the following minority issues were resolved.

Minority Issues can be reviewed in their entirety on the WECC-0141 Project Page, on the Submit and Review Comments accordion, as part of the associated Response to Comments for each posting.

## WECC-0141 Posting 1

Posting 1 was designed to seek consensus on the structure of the proposed document.

The Drafting Team (DT) concurred with the minority view that complete retirement of the Standard (FAC-501-WECC-2) could result in a reliability gap; thus, the team opted not to recommend retirement of the Standard.

The DT agreed to augment the Requirements/Measures with Attachments: 1) A, Transmission Maintenance and Inspection Plan Content, 2) B, Major WECC Transfer Paths in the Bulk Electric System, and 3) C, Revision Process.

A minority voiced concern that:

1. The detail required to perfect Attachments A–C may exceed the scope of the Standard Authorization Request (SAR). The DT disagreed.
2. FAC-501-WECC-2, Attachment B was out-of-date, not technically supported, and should not be used. The DT proposed updating the attachment and creating a means to keep the table current.

## WECC-0141 Posting 2

The minority voiced concerns that:

1. A description of future maintenance practices should not be required. The DT disagreed holding that to do otherwise could create a reliability gap.

Various Non-Substantive changes were not adopted.

## WECC-0141 Posting 3

The minority voiced concerns that:

1. Attachment C, Revision Process, could result in too much detail being included on Attachment B. Although this is a possibility, it would be the Transmission Owners that would dictate the detail and quantity of any equipment added to Attachment B. In that sense, the amount of detail added to Attachment B is self-moderated by those subject to the Standard.
2. Attachment A, Transmission Maintenance Inspection Plan, should be developed in the same or similar fashion as PRC-005, Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance. Although the DT agreed the suggestion had merit, the DT concluded that such an approach would be better suited for a continent-wide Standard.
3. The term “path” should be adopted as used in the WECC Project Coordination and Path Rating Processes, and the WECC 2020 Path Rating Catalog. The DT disagreed noting that use of the term in the extrinsic documents was inconsistent, not defined, and subject to change outside of the Standards development processes.
4. The Version 2, Attachment B title should be retained. The DT disagreed as retaining the title made no progress in negating concerns over incorporation by reference whereby changes to one Standard self-execute in others—without due process. *Subsequent Entry:* WECC-0149 was filed to augment this project. In WECC-0149, the same DT opted to reinstate the use of the title, excerpt the Table from the Standard, and include the Table in the Table Revision Process.
5. Attachment C (Process) would create conflicting means to change the content of Attachment B (Table). This is incorrect. There will be only one process for changing Attachment B within a Reliability Standard. *Subsequent Entry:* WECC-0149 was filed to augment this project. In WECC-0149, the content of the WECC Major Paths Table (list of paths) is removed from the Standard foreclosing the ability to change the list when using the WECC Reliability Standards Development Procedures (Procedures). Restated, the path list could not be changed per the Procedures because the list will not be inside of a Standard. Instead, when the content migrates to the Table Revision Process, that Process dictates the change to the list of paths.

Various non-substantive changes were not adopted.

## Posting 4

The minority voiced concerns that:

1. Breaking the incorporation by reference of Attachment B (Table) and other NERC documents could create multiple “Attachment B” lists. This concern was remedied in WECC-0149 by removing the content of Attachment B from the Standard, placing it in its own freestanding document (Process), and dictating the change process in the Table Revision Process, Process Requirements. See WECC-149 for more detail.
2. Creation of Attachment C (Process) may add administrative burden and additional development processes. This is incorrect as Attachment C largely codifies an existing ad hoc process. Because the existing ad hoc processes are not memorialized, using the proposed Table Revision Process may actually decrease an entity’s burden by eliminating redundancies and processes that may no longer be required.
3. The WECC Path Rating Catalog (Catalog) could create sufficient due process to change Attachment B (Table). This is incorrect as the Catalog does not require due process; rather, it states what “should” occur. Its content and procedures are dictated by other documents and WECC groups. As a result, actions taken by those peripheral document owners could inadvertently affect the Applicability of NERC Standards through incorporation by reference.

## Posting 5 and 6, NERC 45-day Posting

No new Minority Issues were raised in Posting 5, 6, or the NERC posting.