# Posting 2

The WECC-0141 FAC-501-WECC-3, Transmission Maintenance Drafting Team (DT) thanks everyone who submitted comments on the proposed project.

## Posting

The project was originally posted for comment from December 14, 2020, through January 13, 2021.

WECC distributed the original notice of posting on December 10, 2020. On January 12, 2021, notice was dispatched to the WECC Standards Email List extending the comment period to January 26, 2021.

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

Four substantive comments were received. One comment was a non-substantive software test (Comment Two).

## Location of Comments

Comments received on the project can be viewed in their original format on the WECC-0141 project page under the “Submit and Review Comments” accordion.[[1]](#footnote-1)

**Overview**

Posting 2 proposed to remove Paths 22, 50, and 51 from Attachment B of the Standard. The posting also introduces Attachment C, Revision Process as a streamlined procedural alternative for adding and removing assets from Attachment B.

Proposed Attachment C would *not* be part of the Standard and would *not* be subject to compliance. To see how this concept is already in use, refer to BAL-001-TRE-1—Primary Frequency Response in the ERCOT Region, E. Associated Documents.

## Changes in Response to Comment

 *Assets*

Posting 3 introduces the concept of adding and removing “Assets” from the content of Attachment B. The use of the term broadens the potential content that could be considered for inclusion on Attachment B. This change is coupled with a change in the title of Attachment B from “Major WECC Transfer Paths in the Bulk Electric System” to “Major Assets in the Western Interconnection.” This change in title clears the way to decouple FAC-501-WECC-3, Transmission Management from FAC-003-4, Vegetation Management wherein the existing Attachment B title is incorporated by reference.

Because of the incorporation by reference, if the title of Attachment B is not changed, any changes made in FAC-501-WECC-3, Attachment B will self-execute in FAC-003-4 and may result in undue surprise to the Applicable entities in FAC-003-4. Please see the Implementation Plan posted with Posting 3 for additional details.

Per Footnote 1 as proposed in Posting 3, for purposes of FAC-501-WECC-3 only, an Asset is “a path, transmission line, station, Facility, Element, or other asset recorded on Attachment B titled, Major Assets in the Western Interconnection.” This concept is carried throughout the document.

 *Background*

A Background section has been added to explain the evolution of the Standard and its origins from over two decades ago. Because NERC is currently examining removal of such sections from NERC Standards, ultimately, NERC will decide whether or not to keep the Background section. Whether it is kept or not, the information will be used to complete the final filing at NERC should the project be approved.

 *Requirements*

The Requirements section has syntax corrections in Measure 2.

In Requirement and Measure R3/M3, the drafting opted to revert to the approved language of “adhere” rather than other suggestions as there was no consensus on a more suitable word.

 *Compliance*

 The Compliance section generally falls under the boilerplate provided by NERC. Posting 3 includes NERC’s most recent boilerplate language.

 *Violation Severity Levels (VSL)*

The VSLs were not affected in this posting.

 *Associated Document/Attachment C*

Attachment C, Revision Process was further revised. (See below.) In the Associated Documents section an annotation is added to clarify that Attachment C is not part of the Standard.

 *Attachment A Transmission Maintenance and Inspection Plan Content*

Section 1, Facilities was changed to “Assets.”

Section 2, Maintenance *Methodology* was changed to *Method*. Bullet 5 was changed from “As based on recommendations from the equipment manufacturer” to “Equipment Original Manufacturer.” Along with the Section 2 change, a short description of each allowed method was added.

Section 3, Periodicity was changed clarifying the syntax.

Section 4 and Section 5 now include “and Inspection” in their titles. Syntax in Section 5 was updated for clarity.

*Attachment B Major Assets in the Western Interconnection*

The title of Attachment B was changed to reflect the concept of “Assets” rather than paths. The change paves the way for decoupling FAC-501-WECC-3 from FAC-003-4, wherein the older title is incorporated by reference. Corrective drafting in FAC-003-4 should take place to accommodate this change; however, that drafting is outside of the scope of this project. Suggested remedial language/action for decoupling the two Standards is included in the Implementation Plan provided to NERC and included in Posting 3.

As requested in the original Standard Authorization Request, Paths 22, 50, and 51 were removed from the table. For clarity, if this project is approved, those paths will be removed per due process afforded under the WECC Reliability Standards Development Procedures. If Attachment C is approval, additional and/or removal of assets from Attachment B would be subject to the process created in Attachment C.

 *Attachment C Revision Process*

Clarifying language was added to the attachment explaining the difference between the process for changing FAC-501-WECC-3 and the WECC Path Rating Catalog. There are two separate processes; a change in one document does not self-execute in the other.

The Technical Study section added a requirement to report the existing maintenance program for an Asset (see Footnote 1 in the proposed Standard) requested for removal plus a report on the proposed maintenance of that same Asset if the removal request is granted. This addition ensures that, if an Asset is removed, it will continue to be maintained under a program approved by the requesting entity. Further, a requirement was added that the requesting party review the enforceable NERC Standards and report on any potential conflicts should the removal request be granted.

In the Notice section, both the specific and generic notice requirements were updated to better reflect the appropriate parties and the actions assigned to those parties.

## Minority View

The drafting team did not adopt a request to drop the requirement to describe future maintenance if a request is approved.To do otherwise could remove the only maintenance requirement for an Asset, specified in NERC Standards, without leaving a requirement for its continued maintenance, albeit, potentially using an alternate maintenance method.

The drafting team did not adopt a request to substitute “all” with “any” in Requirement R2. “Any” can be a subset of “all;” the opposite is not true.

In the absence of consensus regarding the use of “adhere,” “conform,” or “follow” in Requirement R3, the drafting team defaulted to “adhere” as currently approved.

## Proposed Effective Date

This project is proposed to become effective immediately upon receipt of regulatory approval.

## Action Plan

On February 22, 2021, the WECC-0141 FAC-501-WECC-2, Transmission Maintenance Drafting Team agreed by a majority vote taken via email to post Posting 3 for 30-day comment. The project is targeted for posting beginning February 25, 2021, closing March 25, 2021. The drafting team is targeted to reconvene to address Posting 3 comments as of March 25, 2021, 10:00 a.m. to 12:00 p.m. (Mountain).

If you have questions regarding the posting, please contact W. Shannon Black at (503) 307-5782.

## 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.

| Commenter | Organization |
| --- | --- |
| **1** | Daniela Atanasovski | Arizona Public Service (APS) |
| **2** | Software Test | Software Test  |
| **3** | Toni Orth | United States Bureau of Reclamation (USBR) |
| **4** | Paul Schnitz  | Public Service of Colorado |
| **5** | Cain Braveheart | Bonneville Power Administration (BPA) |

# Index to Questions, Comments, and Responses

### Question

1. Proposed Attachment C would NOT be part of the standard. It creates a flexible process whereby entities can add/remove assets from Attachment B without having to use the full rigors of the Standards Development Procedures. Please see BAL-001-TRE, E. Associated Documents for an example of how this works. The drafting team welcomes comments specific to Attachment C.
2. The drafting team invites comment on all other aspects of the document.
3. Proposed Attachment C would NOT be part of the standard. It creates a flexible process whereby entities can add/remove assets from Attachment B without having to use the full rigors of the Standards Development Procedures. Please see BAL-001-TRE, E. Associated Documents for an example of how this works. The drafting team welcomes comments specific to Attachment C.

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| Comment Summary. For proposed changes and avenues forward, please see the preamble.  |
| **Commenter** | **Comment** |
| APS | AZPS supports the addition of Attachment C as it provides a defined process for the addition or removal of assets from FAC-501-WECC-3. Attachment B. The current Attachment B is a static list that has not been updated in approximately 20 years. Due to significant changes that have occurred on the Bulk Electric System during this time, the current Attachment B may not accurately represent the assets that are most critical to the Bulk Electric System at this time. The inclusion of Attachment C will allow Attachment B to be updated in a timely manner and more accurately reflect assets that are of current relevance to the Bulk Electric System.  |
| **Response** |
| The drafting team appreciates APS’s continued involvement in the standards development process.  |
| **Commenter** | **Comment** |
| USBR | Reclamation recommends all instances of the word "subtracting" or "subtracted" be replaced with the word "removing" or "removed."Reclamation recommends proper and consistent use of acronyms and parenthetical references (e.g., FERC; "Process" or "Revision Process") (i.e., spelling out the acronym in its first occurrence, then using the acronym for all subsequent occurrences; whether or not the parenthetical uses "hereinafter").Reclamation notes that as drafted, the Attachment C Overview section creates confusion by using the term "assets" to include "[p]aths, transmission lines, stations, Facilities, Elements and/or other assets." The Purpose and Process Approval section states that assets can be added or removed from Attachment B; however, Attachment B is a list of paths, not a list of assets. This makes the purpose and function of this process unclear and creates ambiguity where there was none previously. For example, could a Transmission Owner with a small substation (an asset) at one end of one path follow this process to seek removal of the compliance obligation under the standard? What would the outcome be and what documentation would be created? Would following this process also remove the substation from the path definition in the Path Rating Catalog? What mechanism will be used to document the lack of a compliance obligation for an asset that is on a listed path but has successfully been removed from Attachment B?Attachment C "Technical Study and Request" comments:Reclamation recommends the first paragraph of the "Technical Study and Request" section be changed from:To add or remove an asset from Attachment B, the Transmission Owner may request that change by providing a request to the WECC Operating Committee or its successor. That request will include each of the following:5. A description of maintenance practices applicable to asset at the time of the request…To:A Transmission Owner may request the WECC Operating Committee, or its successor add or remove an asset from Attachment B. That request will include each of the following:5. A description of the maintenance practices applicable to the asset at the time of the request…Attachment C "Notice/Comment/Response" comments:Reclamation recommends item 3 be changed from:3. Notice of the proposed change shall allow for a 30-day comment period during which comments regarding the proposed change shall be requested and received by the entities identified in Notice 1 above. The Reliability Coordinator associated with the asset is expected to comment on the proposed change.To:3. Notice of the proposed change shall allow for a 30-day comment period during which comments regarding the proposed change shall be requested and received from the entities identified in item 1 above. All Reliability Coordinators associated with the asset are expected to comment on the proposed change.Attachment C "Request for Approval" commentsReclamation recommends item 1 be changed from:1. At the conclusion of the comment/response cycle(s), the entity requesting the change shall present its findings to the WECC Operating Committee.To:1. At the conclusion of the comment/response cycle(s), the entity requesting the change shall present its findings to the WECC Operating Committee or its successor.The Drafting Team welcomes comments on all other aspects of the document.Comments:Requirement R2 comments:Reclamation recommends Requirement R2 be reworded to allow for the review of the TMIP without requiring annual changes. Reclamation proposes the following language:Change from:R2. Each Transmission Owner shall annually update its TMIP to reflect all changes to its TMIP.M2. Each Transmission Owner will have evidence that it annually updated its TMIP, as required in Requirement R2. When an annual update shows no changes are required to the TMIP, evidence may include but is not limited to, attestation that the update was performed but showed no changes were required.To:R2. Each Transmission Owner shall annually review its TMIP and update the TMIP to reflect any changes.M2. Each Transmission Owner will have evidence that it annually reviewed its TMIP, as required in Requirement R2. Evidence documenting the annual review may include but is not limited to updating the TMIP revision block with an attestation that the review was performed. When an annual review shows no changes are required to the TMIP, evidence may include but is not limited to updating the revision block with an attestation that no changes were required.Requirement R3 comments:Reclamation opposes the word "conform" in Requirement R3. Reclamation recommends the following language:Change from:R3. Each Transmission Owner shall conform to its TMIP.M3. Each Transmission Owner will have evidence that it conformed to its TMIP, as required in Requirement R3.To:R3. Each Transmission Owner shall follow its TMIP.M3. Each Transmission Owner will have evidence that it followed its TMIP, as required in Requirement R3.Attachment A comments:Reclamation recommends the first sentence of Attachment A be revised as follows:Change from:The TMIP shall include, at a minimum, each of the following details:To:The TMIP shall include, at a minimum, each of the following items:Attachment A Item 1 comments:Reclamation recommends the Drafting Team revise and clarify the statement in Attachment A item 1. Facilities. It appears that this item contains a circular reference. Reclamation proposes the following language:Change from:A list of Facilities and Elements as listed in Attachment A that comprise each of the transmission paths listed in Attachment B.To:A list of Facilities and Elements the Transmission Owner owns that comprise each of the transmission paths listed in Attachment B.Attachment A Item 2 comments:Reclamation recommends the following changes to Attachment A item 2. Maintenance Method:Change from:A description of the maintenance method used for the Facility, transmission line, or station included in the TMIP. To:A description of the maintenance method(s) used for each Facility and Element included in the TMIP.Attachment A Item 3 comments:Reclamation recommends the following changes to Attachment A item 3. Periodicity:Change from:A specification of the periodicity that the described maintenance will occur, or under what circumstances it occurs.To:A specification of the periodicity, based on the selected method(s) from item 2, that the described maintenance will occur or under what circumstances it occurs.Attachment A Item 4 comments:None of the items listed are "maintenance," but rather are inspections that could trigger corrective maintenance action.Reclamation recommends changing the title of item 4 from:Transmission Line MaintenanceTo:Transmission Line Maintenance and InspectionsAttachment A Item 5 comments:None of the items listed are "maintenance," but rather are inspections that could trigger corrective maintenance action.Reclamation recommends changing the title of item 5 from:Station MaintenanceTo:Station Maintenance and Inspections |
| **Response** |
| **Replace “subtract” with “remove”**USBR’s suggestion has been adopted. **Use of Acronyms**USBR’s suggestion has been adopted. Once all substantive comments are addressed, the final document will be reviewed by the WECC technical editor to ensure styles are uniform. **Attachment C Use of Assets vs Paths**USBR’s suggestion has been adopted. To add clarity:1. A uniform use of “Assets” to describe Facilities, Elements and/or other assets” will be adopted throughout the document. The language now reads: “Paths, transmission lines, stations, Facilities, Elements, and/or other assets (hereafter “assets”).
2. The Purpose statement was adjusted to reflect USBR’s comment.
3. The title of Attachment B was changed to “Major Assets in the Western Interconnection.” This broadens inclusion and makes way for remedial drafting of FAC-003-4, Vegetation Management and PRC-023, Transmission Relay Loadability, Attachment B. See proposed Implementation Plan posted as part of Posting 3.

**Compliance Avoidance**USBR states, “[C]ould a Transmission Owner with a small substation (an asset) at one end of one path follow this process to seek removal of the compliance obligation under the standard?”The proposed process for adding or removing assets (proposed Attachment C Revision Process) from Attachment B (proposed Transmission Assets in the Bulk Electric System) does not address compliance, nor does the drafting team portend to opine on the intent of an entity using the process described in Attachment C. As proposed, the applicable entity is the Transmission Owner(s) that maintains the assets identified in Attachment B. If there are no assets listed in Attachment B that are maintained by a Transmission Owner, the Standard does not apply to that Transmission Owner.That said, Attachment C creates safeguards to prevent a requesting entity from haphazardly removing an major Asset from Attachment B. Attachment C requires that the requested removal: 1) be vetted by the subject-matter experts at the Operating Committee, and 2) be approved by the WECC Board of Directors (Board). Due process is afforded at each of these steps leaving ample opportunity for the industry to identify either an unnecessary removal or one that may result in a negative impact to reliability. Finally, Attachment C deliberately carries no mandate for the Operating Committee to agree with the requesting party’s request. As such, if the Operating Committee were to be selected as the entity presenting the request to the Board, the Operating Committee could convey “non-support” to the Board before final action was taken. As such, the drafting team believes there are ample opportunities within the proposed process whereby the industry could raise the hue and cry against mis/malfeasance or simply inadvertent error accompanying a requested removal.**Documentation**The Attachment C process requires creation of specific documentation as part of the Technical Study and Request, presented to and reviewed by the Operating Committee (OC) or its successor, supported by notice and due process, with final disposition made by the WECC Board of Directors.**Outcome**Attachment C does not prescribe an outcome. Attachment C describes a process. The discretionary outcome of the process falls to the WECC Board of Directors, acting on the reliability-based recommendation of the Operating Committee or its successor. **Path Rating Catalogue**The procedures for making a change to the WECC Path Rating Catalog and a WECC Regional Reliability Standard are completely separate. An action in either process does not self-execute a change in the other. To add clarity, the team has included the following in proposed Attachment C Revision Process, Purpose and Process Approval:“This Attachment C, Revision Process (Process) is to be used in lieu of the WECC Reliability Standards Development Procedures when adding or removing paths, transmission lines, stations, Facilities, Elements, and/or other assets (hereafter: Assets) listed on FAC-501-WECC-X, Attachment B, Major Assets in the Western Interconnection, (Attachment B), or its successor.*Although the content of Attachment B and the WECC Path Rating Catalog (Catalog) are similar, changes made to either document are governed by two separate processes. Changes to Attachment B are governed by this process (Attachment C). Changes made to the Catalog have been governed by the WECC Project Coordination and Path Rating Processes (PRP) since 1998 or earlier. A change made to Attachment B per Attachment C does not make a change to the Catalog. A change made to the Catalog does not make a change to Attachment B.”*A review of the 2020 Catalog, Document Update Policy (page 4) indicates that changes to the Catalog are governed by the WECC Project Coordination and Path Rating Processes (Procedures). This has been the case since at least 1998. Records prior to 1998 were not available. By contrast, any change to a WECC Regional Reliability Standard such as FAC-501-WECC is governed by the WECC Reliability Standards Development Procedures.Simply stated, the entire Catalog could be deleted, and it would have no self-executing impact on a WECC Regional Reliability Standard. If Attachment B is deleted in its entirety, it would have no self-executing impact on the Catalog. That said, the team is proposing Attachment C Revision Process as a streamlined process in lieu of the more onerous WECC Reliability Standards Development Procedures. **Attachment C "Technical Study and Request**" USBR’s suggestion has been adopted. Please refer to the above response regarding the WECC Path Rating Catalog. **Attachment C Item 5, Maintenance Description**Item 5, Maintenance Description has been changed as follows. 1. A description of maintenance practices applicable to the asset at the time of the request, and a description of the maintenance practices that would apply if the change is approved;

The change addresses WECC staff concerns that the Process must ensure continued maintenance even if the asset is removed from Attachment B. Further, although there was not complete consensus on the matter, the drafting team concluded that asking for a statement on continued maintenance neither imposed an undue burden nor creates ambiguity. In short, where an asset is removed from Attachment B the presumption is that the owner will know how it intends to maintain the asset post removal. **Attachment C "Notice/Comment/Response**" USBR’s suggestion has been adopted. “By” is deleted and replaced with “from.”**Attachment C "Request for Approval"** USBR’s suggestion is adopted. The drafting team has added, “or its successor” to further define the Operating Committee.  |
| **Commenter** | **Comment** |
| Public Service of Colorado | The proposed Attachment C talks about adding or removing Paths and assets from Attachment B. Attachment B is a list of WECC specific Paths and a few Transmission lines.It does not really seem to capture the fact that a Path is usually made up of several different lines and the inclusion or exclusion for assets in the defined Path is governed by the Path Rating process, and approval of the changes to the Paths/Ratings does not sync up with this (unless I have missed that). If it is not covered, it seems like that should be addressed so that there is not any confusion that the if the underlying assets that comprise the Path change that it does not follow the Process in Attachment C |
| **Response** |
| The drafting team appreciates Colorado’s confusion. Please see the above response to USBR regarding the WECC Path Rating Catalog and its relationship to any WECC Regional Reliability Standards. The Attachment C, Revision Process does not govern the content of the WECC Path Rating Catalog (Catalog) nor does the separate procedure for making changes to the Catalog impact FAC-501-WECC. Both documents have their own separate procedures dictating how they may be changed. A change to one is not synonymous with a change to the other.Per Colorado’s statement, Attachment B “is a list of WECC specific paths and a few Transmission lines.” By changing the verbiage throughout from “path” to “Asset” (See fn 1 in the proposed Standard), the content of Attachment B can become more flexible, more precise, and where needed more/or less inclusive.Further by changing the current title of Attachment B from Major WECC Transfer Paths in the Bulk Electric System to Major Assets in the Western Interconnection, the path is cleared to decouple FAC-501-WECC-X, Transmission Maintenance from FAC-003-4, Vegetation Management wherein the Major WECC Transfer Paths in the Bulk Electric System are incorporated by reference. Please see the proposed Implementation Plan for greater detail. The Implementation Plan is posted as part of Posting 3. |
| **Commenter** | **Comment** |
| Bonneville Power Administration (BPA) | Attachment C:1. Overview -First Line: BPA believes the following: 'transmission lines, stations, Facilities, and/or other assets' are all Elements that make up a 'Path' and are included in Attachment A. BPA suggests the process Overview (Attachment C) should point to the location they are listed, in order to reduce confusion. BPA recommends changing the sentence to read "The Elements and/or other assets that make up a Path, as listed in Attachment A (hereafter: assets) once deemed essential…"2. Technical Study and Request -First line: To keep language consistency, change 'remove' to 'subtract'.Number 5: BPA believes providing a "description of maintenance practices" is unnecessary. If the goal is to remove the Path from Attachment B, the relevant information would be provided as to why the Path should be subtracted from Attachment B. If the goal is to add a Path to Attachment B, it is required (R1) for entities to describe maintenance practices in its TMIP (Attachment A). BPA recommends removal of this step from the process.3. Notice/Comment/Response -Step 1: BPA believes the 'notice of proposed changes' request should be sent to impacted (based on ownership, agreements, etc.) Transmission Owners and Transmission Operators. BPA believes those utilities...in which the asset is located or through which it traverses..." will be notified by the broader provisions outlined in Step 2.BPA recommends the following proposed language "Notice of the proposed change shall be made specifically to each impacted (based on ownership, agreements, etc.) Transmission Owner and Transmission Operator and to the Reliability Coordinator associated with that asset."Step 3: It appears there is extraneous language. BPA recommends to remove the language "The Reliability Coordinator associated with the asset is expected to comment on the proposed change." BPA believes this will provide clarity and reduce confusion.The Drafting Team welcomes comments on all other aspects of the document.Comments:BPA supports the document with the following comments and questions seeking clarity:Attachment A:Maintenance Method -Bullet 4: BPA requests the Drafting Team's definition of 'Risk Based'. BPA is seeking clarity as it is not a defined term in the NERC and WECC Glossary of Terms.Bullet 5: BPA believes the word 'As' should be removed for better grammatical context. |
| **Response** |
| **Attachment C****Overview**The drafting team did not completely adopt BPA’s language; however, changes were made to address the concern. The Purpose statement (as proposed) is as follows: “To ensure the Transmission Owner of a Major Asset in the Western Interconnection, identified in Attachment B, has a Transmission Maintenance and Inspection Plan (TMIP); and performs and documents maintenance and inspection activities in accordance with the TMIP.” Further, the applicable portion of the Attachment C purpose statement has been modified as follows: “This Attachment C, Revision Process (Process) is to be used in lieu of the WECC Reliability Standards Development Procedures when adding or removing paths, transmission lines, stations, Facilities, Elements, and/or other assets (hereafter “assets”) from FAC-501-WECC, Attachment B, Major Assets in the Western Interconnection, (Attachment B), or its successor.”The following addition to Attachment C, Revision Process purpose statement is included to clarify the difference between two separate kinds of documents governed by two separate procedures: “The Process does not govern the content of the WECC Path Rating Catalog (Catalog) nor does the separate procedure for making changes to the Catalog impact FAC-501-WECC. Both documents have their own separate procedures dictating how they may be changed. A change to one is not synonymous with a change to the other.”**Technical Study and Request** BPA’s suggestion (mirroring that of USBR) has been adopted throughout the document. **Attachment C Item 5, Maintenance Description**Please see the response to USBR at Attachment C Item 5, Maintenance Description.**Notice/Comment/Response** BPA’s suggestion has been adopted. As proposed, notice would be as follows: “Notice of the proposed change(s) shall be made specifically to: 1) the Transmission Owner(s) that maintains the assets identified in Attachment B, 2) the Transmission Operator(s) that operates the assets identified in Attachment B, and 3) the Reliability Coordinator(s) having oversight of the assets identified in Attachment B.”Notice of the proposed change shall be made generically by dispatching notice of the proposed change(s) via WECC’s Standard Email List, or its successor (as created per the WECC Reliability Standards Development Procedures, or its successor).”**Attachment C—Reliability Coordinator**BPA’s suggestion has been adopted. The stated expectation that the Reliability Coordinator should comment on a requested change has been deleted.  |

1. The drafting team invites comment on all other aspects of the document.

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| Comment Summary. For proposed changes and avenues forward, please see the preamble.  |
| **Commenter** | **Comment** |
| APS | AZPS supports the proposed changes to FAC-501-WECC-3 including Attachments A and B and the additional of Attachment C. |
| **Response** |
| The drafting team appreciates APS’s continued involvement in the standards development process.  |
| **Commenter** | **Comment** |
| USBR | Comments:Requirement R2 comments:Reclamation recommends Requirement R2 be reworded to allow for the review of the TMIP without requiring annual changes. Reclamation proposes the following language:Change from:R2. Each Transmission Owner shall annually update its TMIP to reflect all changes to its TMIP.M2. Each Transmission Owner will have evidence that it annually updated its TMIP, as required in Requirement R2. When an annual update shows no changes are required to the TMIP, evidence may include but is not limited to, attestation that the update was performed but showed no changes were required.To:R2. Each Transmission Owner shall annually review its TMIP and update the TMIP to reflect any changes.M2. Each Transmission Owner will have evidence that it annually reviewed its TMIP, as required in Requirement R2. Evidence documenting the annual review may include but is not limited to updating the TMIP revision block with an attestation that the review was performed. When an annual review shows no changes are required to the TMIP, evidence may include but is not limited to updating the revision block with an attestation that no changes were required.Requirement R3 comments:Reclamation opposes the word "conform" in Requirement R3. Reclamation recommends the following language:Change from:R3. Each Transmission Owner shall conform to its TMIP.M3. Each Transmission Owner will have evidence that it conformed to its TMIP, as required in Requirement R3.To:R3. Each Transmission Owner shall follow its TMIP.M3. Each Transmission Owner will have evidence that it followed its TMIP, as required in Requirement R3.Attachment A comments:Reclamation recommends the first sentence of Attachment A be revised as follows:Change from:The TMIP shall include, at a minimum, each of the following details:To:The TMIP shall include, at a minimum, each of the following items:Attachment A Item 1 comments:Reclamation recommends the Drafting Team revise and clarify the statement in Attachment A item 1. Facilities. It appears that this item contains a circular reference. Reclamation proposes the following language:Change from:A list of Facilities and Elements as listed in Attachment A that comprise each of the transmission paths listed in Attachment B.To:A list of Facilities and Elements the Transmission Owner owns that comprise each of the transmission paths listed in Attachment B.Attachment A Item 2 comments:Reclamation recommends the following changes to Attachment A item 2. Maintenance Method:Change from:A description of the maintenance method used for the Facility, transmission line, or station included in the TMIP. To:A description of the maintenance method(s) used for each Facility and Element included in the TMIP.Attachment A Item 3 comments:Reclamation recommends the following changes to Attachment A item 3. Periodicity:Change from:A specification of the periodicity that the described maintenance will occur, or under what circumstances it occurs.To:A specification of the periodicity, based on the selected method(s) from item 2, that the described maintenance will occur or under what circumstances it occurs.Attachment A Item 4 comments:None of the items listed are "maintenance," but rather are inspections that could trigger corrective maintenance action.Reclamation recommends changing the title of item 4 from:Transmission Line MaintenanceTo:Transmission Line Maintenance and InspectionsAttachment A Item 5 comments:None of the items listed are "maintenance," but rather are inspections that could trigger corrective maintenance action.Reclamation recommends changing the title of item 5 from:Station MaintenanceTo:Station Maintenance and Inspections |
| **Response** |
| **Requirement R2** **“All” versus “Any”**USBR’s suggestion to exchange “all” with “any” was not adopted. “Any” can be a subset of “all.” The opposite is not true.**Requirement R3** USBR’s suggestion was not adopted. After much discussion, the team opted to revert to “adhere” which is in the approved version. “Follow” was less precise than “conform” but neither added any greater value than the approved “adhere.” No change will be made.**Attachment A—“Details”** USBR suggestion was adopted. In the first sentence of Attachment A, “details” is deleted and replaced with “items.” **Attachment A—Item 1** The drafting team appreciates USBR’s approach. The proposed change is as follows: “1. Assets“A list of the Transmission Owner’s Facilities, Elements, or other assets (assets) recorded in Attachment B, Major Assets in the Western Interconnection.” **Attachment A Item 2** The drafting team appreciates USBR’s approach. The proposed change is as follows: “A description of the maintenance method(s) used for the *Assets included in the TMIP*.” (Emphasis added.)**Attachment A Item 3—Periodicity**The drafting team appreciates USBR’s approach. The proposed change is as follows: “Based on the maintenance method(s) selected in Item 2 above, the TMIP shall include a specification of the periodicity at which the described maintenance will occur or under what circumstance it occurs.” **Attachment A Item 4 and 5—Inspection**USBR asserts that none of the items listed in Item 4 or 5 is "maintenance." Rather, the list describes “inspections.” The drafting team adopted USBR’s suggestion to change the section titles as follows: Item 4, “Transmission Line Maintenance and Inspection”Item 5, “Station Maintenance and Inspections.” |
| **Commenter** | **Comment** |
| Public Service of Colorado | No comment. |
| **Response** |
| No response.  |
| **Commenter** | **Comment** |
| Bonneville Power Administration  | Comments:BPA supports the document with the following comments and questions seeking clarity:Attachment A:Maintenance Method -Bullet 4: BPA requests the Drafting Team's definition of 'Risk Based'. BPA is seeking clarity as it is not a defined term in the NERC and WECC Glossary of Terms.Bullet 5: BPA believes the word 'As' should be removed for better grammatical context. |
| **Response** |
| **Attachment A—Clarification of Maintenance Methods**The team agrees that that additional language would be helpful to clarify this section. The following language is proposed: * Performance-based
	+ This approach conducts maintenance by first defining the outcome then designing a maintenance program to meet the end performance.
* Time-based
	+ This approach conducts maintenance based on defined timelines or specific events.
* Condition-based
	+ This approach conducts maintenance based on the current condition of equipment.
* Risk-based
	+ This approach conducts maintenance proactively based on predictive modeling. The RBM approach is a benefit/burden analysis weighing the cost of maintenance against the likelihood of component failure. Assets posing a greater risk to reliability in the event of failure may be maintained more frequently than components posing a lower reliability risk in the event of failure.
* Equipment Original Manufacturer
	+ This approach is based on the recommendations of the equipment manufacturer.

**Attachment A—Maintenance Method—Bullet 5—“As”** The team deleted “as” from the bullet.  |
| **Commenter** | **Comment** |
| WECC Standards  | WECC Standards staff is concerned that Attachment C makes no provision to continue maintenance if an asset is removed from Attachment B.Staff suggests Attachment C include a requirement that the requesting entity inform the OC or its successor as to the entity’s future maintenance plans in the event an asset is removed from Attachment C. The Attachment C requirement need not dictate the specificity for reporting future maintenance but should require a statement of describing the proposed maintenance plan. It could be as simple as a statement that the asset’s future maintenance program would falls under the state’s/PUC’s/government’s/entity’s prescribed maintenance regimes. This concern could be addressed by adding a feature to address how maintenance will continue in the event the Asset is removed from Attachment B. Standards Staff is also concerned that changes made to Attachment B would be self-executing in FAC-003-4, Transmission Vegetation Management because Attachment B is incorporated by reference as follows: “4.2 Transmission Facilities. 4.4.2.3. Each overhead transmission line operated below 200 kV identified as an element of a *Major WECC Transfer Path in the Bulk Electric System by WECC*.” (Emphasis added; AKA: Attachment B.)1) Does the DT have any reliability-related concerns about the self-executing nature of Attachment B in FAC-003-4?Staff suggests adding a requirement in Attachment C mandating a review of the reliability-related impacted to FAC-003-4. (Attachment B is incorporated by reference.) |
| **Response** |
| The drafting team has addressed staff’s concern in Attachment C, Technical Study and Request, at Item 5. The drafting team does not see any reliability related issues impacting FAC-003-4. However, it does note that Attachment C could pose a due process question for the Applicable entities in FAC-003-4. Remediation of that concern is outside of the scope of this project.To ensure the concern is raised at NERC, the drafting team will highlight the concern in its Implementation Plan and propose a decoupling of FAC-501-WECC-3 with FAC-003-4. The decoupling is made simpler by changing the title of the existing Attachment B thereby breaking verbiage chain between FSC-501-WECC-3 and any other standard in which the Attachment B title has been used. The drafting team agrees with staff that adding a requirement for review of other standards as part of Attachment C is warranted. The following language is proposed for Attachment C at Technical Studies Numbered Item 5 and 6: 5. A description of maintenance practices applicable to the Asset at the time of the request, and a description of the maintenance practices that would apply if the Asset is approved for removal from Attachment B.6. A report on enforceable NERC Standards that may be impacted by the requested change.a. If a review of enforceable NERC Standards shows that accepting the request for addition or removal will have no impact on other Standards, a statement to that effect meets this requirement.  |

1. Comments submitted by WECC Standards staff are not included on the project page due to software constraints but are included in their entirety at the end of this document. [↑](#footnote-ref-1)