# Posting 4

The drafting team (DT) for WECC-0141, Transmission Maintenance thanks everyone who submitted comments on the proposed project.

## Posting

The project was posted for comment from April 7 through May 7, 2021.

WECC distributed notice for the posting on April 6, 2021.

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

Three comments were received through the requested electronic template. A fourth comment was received from the United States Bureau of Reclamation (USBR) via email in Word format. Those comments were accepted and entered into the electronic template on USBR’s behalf.

## Location of Comments

All 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.

**Overview**

Generally, the drafting team accepted substantive comments from all entities, blending proposed language wherever possible.

## Minority View

The following concerns were raised but not adopted:

* The name of Attachment B should not be changed. It should be noted that the name change is a non-substantive change for this standard. However, the name change was essential to break the self-executing changes to the Applicability section of other NERC Standards through incorporation-by-reference and in order to meet the requirements of the Standard Authorization Request.
* Severance of approved Attachment B from other NERC Standards (wherein approved Attachment B is incorporated by reference) may create multiple lists. Though correct, the lists will be more closely tailored to the purpose of each applicable standard. Restated, a transmission maintenance list of Path Names may not best suit paths requiring vegetation management.
* Creation of Attachment C may add administrative burden and additional development processes. This is incorrect as Attachment C merely codifies an existing ad hoc process.
* The WECC Path Rating Catalog (Catalog) could create sufficient due process. 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 other NERC standards through incorporation by reference. This concern was voiced by FERC when earlier versions of FAC-501-WECC were approved.

## Changes in Response to Comment

The following specific changes were made after consideration of all comment received.

*Purpose Statement/Applicability/Facilities*

* The Purpose, Applicability and Facilities sections were revamped to reflect a path-centered focus as opposed to an equipment focus.

*Background*

* A footnote was added to the Background section explaining the colloquial use of the term “Version Zero.” Of note, the Background section will likely be removed from the final standard and used as background in the NERC filing. A new section was added clarifying the purpose of Attachment C and annotating the difference between Attachment A (equipment can be added here) and Attachment B (focusing on paths and not equipment).

*Requirements and Measure*

* No change

*Associated Documents*

* Document names were updated reflecting “Path Names” and a refocus from equipment to paths.

*Attachment A—Transmission Inspection Maintenance and Inspection Plan*

* Updated to reflect Attachment B title change.
* The emphasis of Attachment A becomes equipment juxtaposed to Attachment B that is Path Names.

*Attachment B—Path Names Identified for Transmission Maintenance and Inspection*

* The title was updated to reflect the above.
* The first column of the table was deleted leaving only the Path Name and Path Number column headers.

*Attachment C—Revision Process*

* The Transmission Operator and Reliability Coordinator were added to those entities capable of initiating the Attachment C process.
* “Baseline” verbiage was deleted.
* Equipment was replaced with path.

## Proposed Effective Date

The proposed effective is the “First day of the second quarter following regulatory approval.” Because changes to FAC-501-WECC Transmission Maintenance may affect other NERC Standards, the drafting team recommendation is that NERC review those other standards and consider a coordinated implementation date if deemed appropriate by NERC. See the Implementation Plan, Posting 5, Impact on Other Standards.

## Action Plan

The following notice was dispatched.

“On May 28, 2021, the WECC-0141 FAC-501-WECC-2, Transmission Maintenance Drafting Team agreed by a majority vote to post Posting 5 for a 30-day comment period.

Posting 5 will open on June 1, 2021, and close on July 1, 2021. The drafting team will meet on July 20, 2021, 10:00 a.m. to 12:00 p.m. to consider comments. The Drafting Team will meet each two weeks thereafter, at the same time, unless otherwise noted.

Comments can be submitted by selecting the Submit and Review Comments accordion on the WECC-0141 Home Page. Then, click on Submit Responses to Posting 5.”

## Contacts and Appeals

If you feel your comment has been omitted or overlooked, please contact [W. Shannon Black](mailto:sblack@wecc.biz), 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** | Kevin Paletskih | WECC Staff |
| **3** | Cain Braveheart | Bonneville Power Administration (BPA) |
| **4** | Toni Orth | United States Bureau of Reclamation (USBR)[[1]](#footnote-1) |

# Index to Questions, Comments, and Responses

### Question

1. The DT welcomes comments on Attachment A.
2. The DT welcomes comments on Attachment C. Attachment C is NOT proposed as part of the Standard. It is a supporting process.
3. The DT welcomes comments on all other aspects of the proposed standard.

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| Comment Summary. For proposed changes and avenues forward, please see the preamble.  *Question 1—Attachment A*  The Drafting Team welcomes comments on Attachment A. | |
| **Commenter** | **Comment** |
| APS | AZPS supports the changes to Attachment A |
| **Response** | |
| The WECC-0141 FAC-501-WECC Drafting Team (DT) appreciates APS’s continued involvement in the standards development process. | |
| **Commenter** | **Comment** |
| WECC Staff | WECC staff agrees with Attachment A. |
| **Response** | |
| The DT appreciates WECC’s continued involvement in the standards development process. | |
| **Commenter** | **Comment** |
| BPA | **Attachment A: Facilities**  BPA reiterates its previous comments to Posting 3 (bullet below).  Posting 3 comments:  BPA disagrees with the changes made to the facilities in this section as the original language is consistent with comments BPA made during previous postings. In order to reduce confusion, the Facilities and Elements applicable in a TMIP are outlined in Attachment A, section 4 (Transmission Line Maintenance and Inspection) and section 5 (Station Maintenance and Inspection). |
| **Response** | |
| **Attachment A: Facilities**  For more detail, please see response to USBR. A path-centered approach has been adopted per the recommendation of BPA and USBR. | |
| **Commenter** | **Comment** |
| USBR | **Attachment A: Section 1**  Reclamation proposes the following language for Section 1:  A list of Facilities, Elements, Transmission Lines, and other equipment comprising the paths listed on Attachment B. |
| **Response** | |
| **Attachment A: Section 1**  The DT has adopted USBR’s approach as follows. Additional information regarding renaming Attachment B is found below:  “A list of Facilities, Elements, Transmission Lines, and other equipment comprising the named paths on Attachment B, Path Names Identified for Transmission Maintenance and Inspection.” | |

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| Comment Summary. For proposed changes and avenues forward, please see the preamble.  *Question 2—Attachment C*  The Drafting Team welcomes comments on Attachment C. Attachment C is NOT proposed as part of the Standard. It is a supporting process. | |
| **Commenter** | **Comment** |
| APS | AZPS supports the changes to Attachment C. |
| **Response** | |
| The WECC-0141 FAC-501-WECC Drafting Team (DT) appreciates APS’s continued involvement in the standards development process. | |
| **Commenter** | **Comment** |
| WECC Staff | There are concerns with Attachments C, section "Technical Study and Request.”  WECC’s Risk team sees a concern that only Transmission Owners (TO) may trigger/submit requests for addition or removal from Attachment B list. Since TOs are the ones who must do the maintenance, self-interest would rarely lead a TO to request their own equipment to be added.  WECC believes that Transmission Operators (TOP) and reliability Coordinators (RC) should also have an ability to trigger this request. Current language limits the ability of TOPs and RCs to submit revision requests to Attachment B list. |
| **Response** | |
| For Clarity: Attachment C is not part of this standard and does not impose any reliability task.  The drafting team adopted WECC’s suggestion. The Transmission Operator and the Reliability Coordinator have been added to Attachment C. | |
| **Commenter** | **Comment** |
| BPA | **Attachment C: Multiple Lists**  What the drafting team is proposing would now create multiple, overlapping lists, each one governed by a different process for modifications. BPA believes this change would create more complexity, and a technical, time, administrative, and resource burden on the Western Interconnection’s registered entities. BPA does not believe entities, obligated under FAC-003, PRC-023, or other NERC Reliability Standards, will be surprised by the removal of items from Attachment B, WECC Major Transfer Paths in the Bulk Electric System.  **Due Process and the Path Rating Process**  As BPA understands it, the due process, outlined in the Path Rating Process (Path Delisting Process), would ensure that all entities affected by a path addition or removal are notified and coordinated with in a similar fashion to the proposed Attachment C, Revision Process. As outlined by the “number of steps” APS took to remove the paths from the WECC Path Rating Catalog (below from FAC-501-WECC white paper):  “Before filing the WECC-0141 SAR, APS took a number of steps to have Paths 22, 50, and 51 removed from the WECC Path Rating Catalog. Though not identical to the steps proposed in Attachment C, those steps provided the industry with the same adequacy of due process and technical review proposed in Attachment C. As such, if approved this project would modify Attachment B by removing Paths 22, 50, and 51 and also provide a more efficient means to modify Attachment B without applying the full rigors of the WECC Reliability Standards Development Procedures.”  BPA believes the “same adequacy of due process and technical review”, outlined in the text from the white paper above, is how entities (FAC-003, PRC-023, FAC-501, etc.) affected by any changes (by reference) to Attachment B would be notified and coordinated with to be aware and understand what changes are being made. Therefore, undue surprise would be averted. We believe that the WECC Path Rating process seems to be sufficient, as in the case of Paths 22, 50, and 51.  BPA also agrees with Reclamation’s assertion that entities affected by FAC-003 and PRC-023 or, entities outside the western interconnection, would not inherently know to search FAC-501-WECC for the list of WECC Major Transfer Paths in the BES, as FAC-501-WECC is not specifically listed with the language of those Standards. |
| **Response** | |
| **For Clarity: *Attachment C is not part of this standard and does not impose any reliability task.***  The impact of Attachment C on reliability may be a null set. This is one reason it is not included in the standard; it is not a reliability-related task. By contrast, if it clarifies the roles of applicable parties, its value in the compliance arena and due process may be substantial.  **Attachment C: Multiple Lists**  BPA argues that having a single list to meet the needs of vegetation management (FAC-003), transmission maintenance (FAC-501), and system protection and control (PRC-023) is the goal to be achieved. Administratively, this may be correct. However, from a reliability standpoint, it may enhance reliability to have specific lists apply to specific standards—not one-size-fits-all. Stated differently, a vegetation management specialist may not be the best SME to address transmission maintenance or system protection.  **Attachment C: Conservation of Resources**  BPA argues that multiple processes can create a “resource burden on the Western Interconnection’s registered entities.” To the contrary, adoption of Attachment C should conserve resources. Currently, if an applicable entity seeks to change Attachment B, an ad hoc process is created similar to that pursued by APS. Because it is ad hoc, at minimum it requires each entity to re-create the wheel (sua sponte) to design adequate due process based on all the surrounding circumstances. By standardizing the process, the requesting entity will not pursue superfluous activities, will not have to re-create the ad hoc process each time, and can be more certain of the resource commitment prior to starting the process.  This standardization is what BPA argued for in Order 751, at P23, (Docket RM09-9-000) wherein:  Order 751, P23. “Bonneville…support[ed] the Commission’s proposal to require WECC to develop and file criterion to clarify how major transmission paths are included in or excluded from the WECC Transfer Path Table. Bonneville believes that filing such criterion would provide transparency for transmission owners that are affected by changes to the table.”  **Attachment C: Due Process and the Path Rating Process**  BPA argues that the “same adequacy of due process and technical review” achieved by APS can be achieved without Attachment C. That is correct. However, it must be highlighted that neither the WECC Path Rating Catalog nor its associated documents provide for a FERC monitored/approved means of due process. Further, the majority of their content is advisory, only listing steps that “should” be taken. (See detailed response Posting 3, BPA at pages 25–26)  The concern is seen by arguing the extreme. By its own verbiage, the Catalog is incomplete and advisory. Changes to its content are controlled in other documents, owned by SME subgroups, overseen and subject to the procedural rules of other larger SME groups. This means the group at the top of that pyramid could change its own procedural rules and enforce those rules on their subgroups. In turn, this means the top of the pyramid controls how the content of the Catalog and, therefore, that titular group controls the content of Attachment B. The entity controlling the content of Attachment B controls the applicability of FAC-501-WECC and every continent-wide standard in which Attachment is contained. By default, this approach circumvents the NERC Standards Development Process and/or the WECC Reliability Standards Development Process, avoids FERC, and controls the applicability of each standard in which Attachment B is incorporated by reference.  Standardization through approval of Attachment C: 1) eliminates iterative re-creation of process, 2) creates a vetted, clear, and transparent process, 3) ensures a “level playing field,” and 4) the rules do not change based on who made the request.  Although APS succeeded in providing adequate due process, without boundaries there is no guarantee that the next requesting entity will be as successful or as transparent as APS.  The DT agrees with BPA and USBR in that “entities outside the Western Interconnection would not inherently know to search FAC-501-WECC for the Attachment B list.” That is precisely the DT’s point. The applicability of the affected continent-wide standards could change without notice.  **Attachment C: Multiple Processes**  BPA is concerned that the project will require entities to engage in multiple processes. BPA is correct—but *they already do.* If an entity wants to change a NERC Standard, they use the NERC standards development process already in place. If an entity wants to change a regional standard they use the WECC standards development process already in place. If an entity wants to change the content of Attachment B—outside of both the aforementioned processes—they create an ad hoc process. Codification of Attachment C does not add a new process; it streamlines the existing one and ensures a fair and transparent process.  The DT believes the burden is comparable (or less) whether using Attachment C or re-creating the wheel through an ad hoc procedure, coordinated through various committees, that have an annual charter-drive mandate to review their procedures and make changes as those groups deem appropriate. | |
| **Commenter** | **Comment** |
| USBR | **Attachment C: Short Form “Process”**  The document indicates the short form “Process” will be used to refer to Attachment C, Revision Process, but Attachment C contains multiple references to the Revision Process. Reclamation recommends changing the short form to “Revision Process,” or correcting subsequent references to only “Process.”  The drafting team appreciates Reclamation’s observation. The team has opted for “Revision Process” for greater clarity. Changes will be made throughout.  **Attachment C: Use of the word “Paths”**  Reclamation recommends that “paths” are the proper level of asset to be listed on Attachment B and that if paths are added to or removed from Attachment B, Transmission Owners can use Attachment B as a starting point from which to identify equipment for transmission maintenance and inspection pursuant to Attachment A. Therefore, Attachment B should not contain equipment at a level more granular than a path. Reclamation recommends the title of Attachment B remain “Major WECC Transfer Paths in the Bulk Electric System.”  **Attachment C: Use of “Baseline”**  The “baseline” process concept is unclear and could be confusing. Having a baseline implies there is some need to track changes to the process.  Reclamation observes the purpose of Attachment C is clearly to add or remove paths from Attachment B, separate from the normal standards development process; therefore, Reclamation recommends there is no need for Attachment C to provide a method by which changes to Attachment C itself are tracked. Reclamation recommends removing references to the “baseline” and simply state the process to be used.  Alternatively, it appears the “baseline” section could be intended to provide additional historical background information. If so, Reclamation recommends eliminating references to “baseline” and changing the section heading to “Background Information” or something similar. |
| **Response** | |
| **For Clarity: *Attachment C is not part of this standard and does not impose any reliability task.***  **Attachment C: Short Form “Process”**  Thank you. The DT has adopted “Revision Process” for clarification. Changes will be made throughout.  **Attachment C: Use of the word “Paths”**  Per USBR’s request, the path-centered approach has been adopted. A change was made to the title of Attachment B (see above).  **Attachment C: Use of “Baseline”**  The following language is deleted:  “Establish the Baseline  This Revision Process establishes the baseline process for adding equipment to or removing equipment from Attachment B.” | |

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| Comment Summary. For proposed changes and avenues forward, please see the preamble.  Question 3—All Other  The Drafting Team welcomes comments on all other aspects of the proposed standard. | |
| **Commenter** | **Comment** |
| APS | AZPS supports the proposed changes to FAC-501-WECC. |
| **Response** | |
| The WECC-0141 FAC-501-WECC Drafting Team (DT) appreciates APS’s continued involvement in the standards development process. | |
| **Commenter** | **Comment** |
| WECC Staff | Only comment for Attachment C section. |
| **Response** | |
| The DT appreciates WECC’s continued involvement in the standards development process. | |
| **Commenter** | **Comment** |
| BPA | The Bonneville Power Administration (BPA) appreciates the opportunity to comment on the WECC-0141 Revisions to FAC-501-WECC-3, posting 4.  **Introduction/Purpose**  BPA reiterates its previous comments to Posting 3 (bullet below) and agrees with the US Bureau of Reclamation’s (Reclamation) comments regarding proposed language for the purpose section.  Posting 3 comments: BPA disagrees with the changes made to the purpose section as the original language is consistent with Attachment B in title and purpose. BPA believes nomenclature used in FAC-501-WECC-3, Attachments, or associated documents should refer to the ‘path(s)’ specified in Attachment B, WECC Major Transfer Paths in the Bulk Electric System (BES)  **Applicability**  BPA reiterates its previous comments to Posting 3 (bullet below) and agrees with Reclamation’s comments regarding proposed language for the applicability section.  **Posting 3 comments:** BPA disagrees with the changes made to the applicability section as the original language (paths) is consistent with Attachment B in title and purpose.  **Facilities**  BPA agrees with Reclamation’s language recommendation with additional input. This section be revised as follows:  Bulk Electric System Facilities, Elements, Transmission Lines, and other equipment, *as listed on Attachment A*, that comprise a Major WECC Transfer Path in the BES listed on Attachment B.  **Background**  BPA appreciates the SDT’s attempt to clarify this section based on our previous comment. However, BPA disagrees with the use of the term ‘equipment’ in reference to Attachment B. BPA recommends the word ‘equipment’ be revised to ‘path’ to keep consistent with the original title of Attachment B, WECC Major Transfer Paths in the BES.  **Requirements and Measures: R3**  BPA agrees with revising the language to state ‘equipment’ in reference to the TMIP.  **Associated Documents**  BPA disagrees with renaming Attachment B. BPA believes the intent of Attachment B remain a list of paths where maintenance (on a specific set of equipment (Attachment A)) should be performed.  Additionally, BPA agrees with Reclamation’s comments regarding the proposed title change and perceived intent to transform a list of paths to a list of equipment.  **Attachment B: Document Title**  BPA reiterates its previous comments to Posting 3 with additional input (bullet below).  BPA disagrees with the proposal to change the title of Attachment B to ‘Equipment Identified for Transmission Maintenance and Inspection’. BPA believes the intent of Attachment B remain a list of paths where maintenance (on a specific set of equipment (Attachment A)) should be performed.  • Additionally, BPA agrees with Reclamation’s comments regarding the proposed title change and perceived intent to transform a list of paths to a list of equipment.  **Implementation Plan/Effective Date**  First paragraph:  BPA disagrees with use of the language ‘equipment’ in this context. BPA recommends using the language ‘paths’ as this is consistent with the title and purpose of Attachment B, a list of ‘WECC Major Transfer Paths in the BES’.  **Impact on Other Standards**  BPA continues to disagree with changing the title and intent of the Attachment B, Major Transfer Paths in the Bulk Electric System. BPA believes the intent is to have a single document (WECC Major Transfer Paths) that would apply broadly across the NERC Standards, as needed.  **Overall Specific Comments**  BPA reiterates its previous comments from Posting 3 with additional input (bullet below):  BPA believes the proposed revisions fundamentally changes how NERC Reliability Standards engage with the WECC Major Transfer Paths in the BES (Attachment B). Specifically, it creates a situation where there is one Major Transfer Paths List for FAC-501-WECC-3 and a different list(s) for all other Standards that currently reference the ‘WECC Major Transfer Paths in the BES’ and ‘major paths in the western interconnection’ (FAC-003, PRC-023). These separate Major Transfer Path list(s) would also have different processes to review and revise as needed. Those new lists in the various Standards may not align with one another as time goes on and as changes to each list are made. Furthermore, having to engage in multiple, separate processes in order to add or remove a path would effectively impose a time and resource burden on entities attempting to track and update two (or more) separate lists. BPA doesn’t believe this will add to the reliability of the BES, rather, it imposes burden to industry with no reliability benefit. |
| **Response** | |
| **Introduction/Purpose**  After consideration of both BPA and USBR’s positions, the DT agrees that the overall document should be crafted from the standpoint of paths as opposed to equipment. Though the DT has not opted to adopt the precise language of either BPA or USBR, the DT has melded the two proposals in redrafting the Purpose statement.  The DT is proposing the Purpose statement as follows:  “To ensure the Transmission Owner of a path identified in Attachment B, Path Names Identified for Transmission Maintenance and Inspection, has a Transmission Maintenance and Inspection Plan (TMIP) for those paths, annually updates its TMIP, and adheres to the TMIP.”  This format parallels that already approved, adopts the path-centered approach requested by BPA and USBR, while accommodating a change in title for Attachment B that mirrors the table’s only remaining textual columnar descriptor “Path Names.”  **Applicability**  The DT concurs with BPA and USBR, and has adopted a path-centered focus for the document. Please see the DT’s response to USBR regarding the Applicability section.  **Facilities**  The DT concurs with both BPA and USBR, and offers a melded approach in hopes of meeting the needs of both entities while meeting the requirement of the Standard Authorization Request (SAR) “to ensure proper coordination with existing NERC Standards.” If the DT fails to ensure proper coordination with existing NERC Standards, *that shortfall would be grounds for the WSC to remand the project for remedial action.[[2]](#footnote-2) (See Procedures, Step 7.)* Please see the DT’s response to USBR regarding the Facilities section.  The proposed Facilities language is as follows:  “Bulk Electric System Facilities, Elements, Transmission Lines, and other equipment comprising the named paths on Attachment B, Path Names Identified for Transmission Maintenance and Inspection”  **Background**  The DT agrees with both BPA and USBR in redrafting the document from an equipment-centered approach to a path-centered approach. Please see the DT’s response to USBR regarding the Background section.  **Requirements and Measures: R3**  Thank you. No further changes are proposed.  **Associated Documents**  Please see the DT’s response to USBR.  The DT agrees with both BPA and USBR that the intent of the table is path-centered, not equipment-centered. As such, the table title has been redrafted to reflect a path-centered approach as opposed to an equipment-centered approach. In the event an entity wishes to address specific equipment, the DT has adopted stakeholder’s comments in Posting 3 that equipment be addressed in Attachment A (TMIP)—not Attachment B.  To meet the needs of BPA, USBR, and the SAR, the DT proposes the following change in the title to Attachment B:  “Path Names Identified for Transmission Maintenance and Inspection.” (Emphasis added.)  The DT believes this approach:  1) Meets BPA’s concern that the title should focus on paths as opposed to equipment;  2) Meets BPA’s concern concomitant with USBR that Attachment B should only include paths and not equipment;  3) Ensures the intent is retained by directly tying the title to the only textual columnar descriptor left in the table (Path Name); and,  4) Meets the requirements of the SAR to ensure proper coordination between this project and other Reliability Standards.  **A Non-Substantive change for FAC-501-WECC**  It should be noted that a change to the title of Attachment B will have no impact on the administration or implementation of the standard. Per BPA’s comment, the primary reason for revising the title is to avoid confusion and to have the title match the content. The proposed title meets that need.  By contrast, to the extent a change in the title raises actual reliability-related concerns, those concerns would arise in standards other than this FAC. If that is BPA’s concern, that concern is remedied by eliminating any incorporation by reference of this standard into any other standard.  **Attachment B: Document Title**  See above response at F. Associated Documents.  **Implementation Plan: Effective Date/First paragraph:**  The DT opted for the approach provided by USBR. Please see those responses. Changes made in the standard will be reflected in the Implementation Plan.  **Impact on Other Standards**  At the threshold, it should be noted that changing the title of Attachment B is a non-substantive change making no change to how this standard would be implemented. To the extent the retitling has any impact on a reliability-related task, that change would occur in standards other than of FAC-501-WECC.  As to intent, the DT came to the opposite conclusion of BPA after researching FERC’s previous treatment of the matter and BPA’s earlier comments provided to FERC in the Notice of Proposed Rulemaking (NOPR) leading up to Order 751. If BPA believes FERC’s intent is to have a single document broadly applied across all NERC/WECC Standards, the DT would willingly review any FERC orders on point that the DT may have missed. (See Attachment 1A, WECC-0141 Posting 1, Response to Comments—Incorporation by Reference, Responses 1-Question 10. The entire document is dedicated to the topic.)[[3]](#footnote-3)  BPA previously acknowledged the applicability concerns in its comments to FERC in Order 751.  In Order 751, P20, wherein FAC-501-WECC-1 was approved, BPA raised concerns that “the applicability of FAC-501-WECC-1 could change without review and approval by NERC and the Commission” depending on how Attachment B was administered. (See also response to USBR regarding Wikipedia). This concern is realized in that FAC-003 inextricably references “WECC Major Transfer Paths” in R1, R2, and 4.3.1.3. Based on the cross reference and FERC’s treatment of the matter, it’s hard to argue that a change to the title of Attachment B will have no impact on the applicability of FAC-003. Thus, if a non-substantive change in this project can alter the implementation of FAC-003, then the NERC Standards Development Process can be completely circumvented; thus, no due process.  BPA reinforced its concern at P22 arguing that the Commission should require WECC “to provide greater certainty regarding the applicability of FAC-501-WECC-1 based on the WECC Transfer Path Table.” And finally, at P23, BPA argues that filing the criteria whereby the content of Attachment B is addressed “would provide transparency for transmission owners that are affected by changes to the table.” These statements by BPA are a precise bounding of the due process and incorporation by reference concerns raised by FERC and reiterated in this forum.  The remedy BPA sought in Order 751, P21-22 can be realized through the non-substantive title change of Attachment B. The remedy BPA sought in Order 751, P23 can be achieved through implementation of Attachment C.  **Impact of having a Single Document/Incorporation by Reference**  BPA argues that the intent of Attachment B is to serve as a single document broadly applied across the NERC Standards. Yet, BPA previously acknowledged the pitfalls of changing the attachment’s content without full transparency. Transparency dims where changing one standard also changes another.  Where one document includes language from another document by referring to it rather than repeating it—that is the definition of incorporation by reference. Incorporation by reference means that when a referenced document changes (Attachment B), it affects all other documents in which it is referenced (depending on the content change). BPA alludes to this incorporation in its comments regarding FAC-003 and PRC-023.  If the content (not the title) of Attachment B is changed in this project and approved by FERC, the changes to the table will directly affect the implementation of every other continent-wide standard in which Attachment B is mentioned. This accentuates the need to break the incorporation by reference (change the title of Attachment B) because notice of this project is only mandated for those that request notice of this regional action. To quote USBR, “FAC-003-4 does not contain any reference to FAC-501-WECC [only Attachment B]; therefore, it is not reasonable to assume that an entity looking for a list of Major WECC Transfer Paths would immediately go to FAC-501-WECC to find the list.” This is an apt description of diluted due process.  If BPA’s umbrella policy is adopted, the applicable entities in referenced standards: 1) “could change without review and approval by NERC and the Commission,” 2) will not be provided “greater certainty regarding the applicability of FAC-501-WECC-1 based on the WECC Transfer Path Table,” and 3) will not be provided “transparency for transmission owners that are affected by changes to the table.”  **Overall Specific Comments**  See above response. | |
| **Commenter** | **Comment** |
| USBR | **Purpose**  Reclamation proposes the following language for the purpose section of FAC-501-WECC-3:  To ensure each Transmission Owner of equipment identified on comprising a Major WECC Transfer Path Attachment B, Equipment Identified for Transmission Maintenance and Inspection (Equipment) has a Transmission Maintenance and Inspection Plan (TMIP) for that Equipment, annually updates the Equipment’s reviews that TMIP, and adheres to that TMIP  **Applicability**  Reclamation recommends that “paths” is the appropriate term instead of “equipment” for Section 4.1.  **Facilities**  Reclamation recommends Section 5 be revised as follows:  ~~Those~~Bulk Electric System Facilities, Elements, Transmission Lines, and other equipment comprising the Major WECC Transfer Paths listed on Attachment B~~, Equipment Identified for Transmission Maintenance and Inspection~~ .  **Background:**  “Version Zero” is not a common enough term to avoid upsetting the flow when reading. Reclamation recommends “Version Zero” be replaced with a specific reference, such as FAC-501-WECC-0. At a minimum, the term should not be capitalized to avoid giving the appearance of a NERC Glossary term.  Reclamation offers the following suggested language:  Rather, WECC’s initial versions of reliability standards were designed… …WSCC translated the RMS into what would become NERC’s initial mandatory Reliability Standards.  Reclamation recommends removing the italic formatting from “why” and “process” in the last two paragraphs of the background section. Reclamation supports the insertion of “process” and recommends that “new baseline” can now be removed.  **Requirements and Measures**  Reclamation supports the Posting 4 changes in this section.  **Associated Documents/Title of Attachment B**  The Draft 4 proposed title for Attachment B is confusing. Reclamation understands the purpose of Attachment B is to guide entities to identify the equipment they must maintain. Reclamation asserts that FAC-501-WECC Attachment B is still a list of the Major WECC Transfer Paths in the Bulk Electric System, not a list of “equipment identified for transmission maintenance and inspection.” The NERC Glossary defines Facility as “A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line…”. The WECC Path Rating Catalog defines each path as “A description of the path in terms of the transmission lines comprising the path…”. If a line is a collection of equipment, and a path is a collection of lines, then a path cannot be a piece of equipment and a list of paths should not be titled a list of equipment. Reclamation asserts that FAC-501-WECC Attachment A item 1 will be the list of equipment identified for transmission maintenance and inspection. This equipment comprises the paths listed in Attachment B.  As proposed, the modifications to FAC-501-WECC appear to imply that Attachment B is intended to become a lengthy list of all equipment that is subject to the maintenance required that is owned by all entities to which FAC-501-WECC applies. Reclamation does not support this expansion of Attachment B. Please refer to the proposed language for Attachment A Section 1 below to resolve this confusion. Reclamation recommends the title of Attachment B remain “Major WECC Transfer Paths in the Bulk Electric System.” Reclamation suggests the effective date could be added to the title of Attachment B for additional clarity, e.g., “Major WECC Transfer Paths in the Bulk Electric System as of 2021.”  Reclamation recommends the title of Attachment B remain “Major WECC Transfer Paths in the Bulk Electric System.”  **Asterisks**  Reclamation recommends the title of Attachment B remain “Major WECC Transfer Paths in the Bulk Electric System.” Reference the single and double asterisks in Attachment B, which direct the reader to WECC’s Path Rating Catalog.  While the standard is open for revision, Reclamation recommends the Attachment B table revised to delete the left-most column with numbers in it and only use the Path Number column. This will help to avoid confusion; for example, line number 4 is really path number 5.  **Implementation Plan/Page 1**  The Bureau of Reclamation offers the following comments on “WECC-0141 FAC-501-WECC Posting 3 - Attachment F - Implementation Plan - Redlined to Posting 4.docx”  Reclamation recommends WECC identify the other standards that the drafting team recommends NERC review in coordination with FAC-501-WECC.  **Implementation Plan/Page 2**  First line: “effected Transmission Owners” should be “affected Transmission Owners.”  **Implementation Plan: Second full paragraph**  Reclamation recommends “Path Names” not be capitalized to avoid the appearance of being a NERC Glossary Term.  **Implementation Plan: Third full paragraph**  Reclamation recommends “That review **if** outside of the scope of this project” should be “That review **is** outside the scope of this project.”  **Implementation Plan: Impact on Other Standards**  It is not clear what “Version Zero” documents are. Reclamation recommends “Version Zero” be replaced with a specific reference.  **Implementation Plan/Page 3**  *FAC-003-4, Transmission Vegetation Management*  Reclamation disagrees that any change made to approved Attachment B through proposed Attachment C would cause undue surprise outside of the Western Interconnection when attempting to comply with FAC-003-4.  FAC-003-4 does not contain any reference to FAC-501-WECC; therefore, it is not reasonable to assume that an entity looking for a list of Major WECC Transfer Paths would immediately go to FAC-501-WECC to find the list. More likely, such an entity would search the internet for “Major WECC Transfer Paths” and be directed to a number of websites, including wecc.org, Wikipedia, and nerc.com. Upon reviewing these sites, it is unlikely that an entity not in the Western Interconnection would conclude that the regional standard FAC-501-WECC applies to a non-WECC entity; therefore, the lack of any readily available document titled “Major WECC Transfer Paths in the Bulk Electric System” continues to be problematic. Reference the single and double asterisks in Attachment B, which direct the reader to WECC’s Path Rating Catalog.  Reclamation supports the addition of the list of Major WECC Transfer Paths in the Bulk Electric System to FAC 003 as errata, but acknowledges that FAC-003 is outside the scope of the drafting team’s work on FAC-501-WECC.  *PRC-023-4, Transmission Relay Loadability, Attachment B*  Reclamation disagrees that the use of “a major transfer path within the Western Interconnection as defined by the Regional Entity…” in PRC-023 is any more or less directly connected to FAC-501-WECC than the FAC-003 reference. The same PRC-023 phrase is also used in the NERC Glossary definition of Bulk Electric System. Reclamation asserts it is unlikely for any entities not in the Western Interconnection to find FAC-501-WECC applicable, and that entities to whom “major transfer path in the Western Interconnection” or similar language has significance will likely refer to the WECC Path Rating Catalog. |
| **Response** | |
| **General Drafting Team Comments**  The DT greatly appreciates USBR’s early and detailed submission of its comments. USBR is to be commended for its detailed and continued support of the standards development process.  **WECC Styles**  As to styles and wordsmithing, many are not aware that WECC has its own style guide. Before each standard and associated document is finalized, documents are referred to WECC’s technical editor for review and standardization to WECC’s specific styles.  **Due Process**  As to the continued use of the precise title of FAC-501-WECC-2, Attachment B, WECC Major Transfer Paths in the Bulk Electric System, the drafting team is aware that USBR and others do not perceive a due process issue in continuing the use of that title. However, as mentioned above in the response to BPA, BPA did, in fact, raise that specific issue in the precedent NOPR.  If the DT’s and BPA’s earlier position is correct, the due process issue for FAC-003, Transmission Vegetation Management and PRC-023, Transmission Relay Loadability will fall squarely at the feet of NERC, and remediation falls outside of the scope of this project. As such, it is appropriate to raise the issue to NERC as part of this project’s Implementation Plan. Further, since a change to the title of Attachment B would be non-substantive for this standard, it seems that by inference stakeholders recognize the potential for a self-executing change to peripheral standards if the content of Attachment B is changed.  For an overview addressing FERC’s treatment of Attachment B in FAC-501-WECC, FAC-003 and PRC-023, please review Attachment 1A WECC-0141 Posting 1, Response to Comments—  Incorporation by Reference, Responses 1-Question 10. The entire document is dedicated to the topic.[[4]](#footnote-4)  **Purpose**  Please refer to responses regarding Incorporation by Reference and due process.  The DT appreciates USBR’s approach that the overall document should be more keenly geared toward the traditional path approach rather than a more detailed approach such as was offered in previous postings.  Noting that a change to the title of Attachment B would not change the implementation of the standard, and also noting the value of mirroring the title of Attachment B with the Purpose statement, the DT offers the following compromise:  For the Purpose statement:  “To ensure the Transmission Owner of a path identified in Attachment B, Path Names Identified for Transmission Maintenance and Inspection, has a Transmission Maintenance and Inspection Plan (TMIP) for those paths, annually updates its TMIP, and adheres to the TMIP.”  For Attachment B, the proposed title is as follows:  *Path* ***Names*** ***Identified for Transmission Maintenance and Inspection***  The proposed language adopts USBR’s/BPA’s path-centered approach while breaking any connection between FAC-501-WECC and any other NERC Standard. The proposed Attachment B name change should have no impact on implementation of the standard as it adopts the current content while also adopting the descriptive phrase “Path Name” as already included as the only remaining textual columnar descriptor on the table.  For more detail, please refer to Posting 4 responses to the Bonneville Power Administration (BPA) regarding Associated Documents.  **Applicability**  The DT adopted USBR’s approach as follows:  “4.1 Transmission Owners maintaining paths listed on Attachment B.  **Facilities**  In keeping with USBR’s path-centered approach, the DT proposed the following:  5.1 Bulk Electric System Facilities, Elements, Transmission Lines, and other equipment comprising the named paths on Attachment B, Path Names Identified for Transmission Maintenance and Inspection  **Background**  Of note, the Background section may not remain in or be offered for inclusion in the standard. To include the Background outside of the standard is NERC’s current trend. If the content is not to be included in the standard, the content will most certainly be used to draft NERC’s filing of the project with FERC.  The DT has adopted the following language and associated foot note:  “Rather, the initial versions of WECC’s regional Reliability Standards were designed to address the outages collectively by continuing operational practices addressed in the RMS.” (With the following foot note.) “The initial version of WECC’s regional Reliability Standards are colloquially referred to as Version Zero standards and were first accepted by FERC in Docket No. RR07-11-000, July 2007.”  As USBR raises a similar concern regarding the Implementation Plan, an updated annotation will be made there as well.  **Italics**  Whereas the WECC Styles Guide is silent on the matter, the default use of italics is to draw attention to a word. In the case of the first use “why” the draft retains the italics drawing specific attention to the fact that technical support for including Path Names in Attachment B has *never* been provided.  As for the second italicized use, the following language has been adopted:  “The addition of FAC-501-WECC-3, Attachment C, Revision Process is intended to provide a streamlined development process for adding and removing paths from Attachment B. Specific equipment comprising a path can be identified on FAC-501-WECC-3, Attachment A, Transmission Maintenance and Inspection Plan.”  **Requirements and Measures**:  USBR supports the Posting 4 changes in this section. Thank you.  **Associated Documents/Title of Attachment B**  In accord with USBR’s earlier path-centered suggestion, and in keeping with USBR’s intent to better clarify the purpose of Attachment B without unduly inviting content expansion, the DT proposes titling Attachment B as follows:  *Path Names Identified for Transmission Maintenance and Inspection*  For more detail, please refer to Posting 4 responses to the Bonneville Power Administration (BPA) regarding Associated Documents.  The DT takes note of USBR’s desire to retain the twenty-year old Attachment B title; however, the DT also notes that changing the title should have no material impact on how the standard is implemented as it is the content of the table that determines the reliability-related task—not the title. At best, the title is used to describe the content—not to perform a reliability task. As such, the title should be concise but not outcome determinative.  By contrast, if the title is not changed, the DT believes it could have an adverse impact on due process in other projects, as previously noted by FERC and BPA in its pre-Order 751 NOPR comments. As such, the risk of harm to due process outweighs the burden of changing the title. So long as the title remains concise, USBR’s goal and that of the DT are both achieved. To present a final work product to the WSC that does not ensure proper coordination between other standards would fall short of the SAR requirements and provide the WSC with grounds for remand. See footnote 2 above.  **Asterisks**  The DT is not proposing a change to the asterisk-related items.  While the standard is open for revision, USBR recommends the Attachment B table revised to delete the left-most column with numbers in it and only use the Path Number column. This will help to avoid confusion; for example, line number 4 is really path number 5. This has been adopted.  **Implementation Plan/Page 1**  In place of the proposed language at the end of the Effective Date stating, “See Other Standards Impacted,” the following has been edited in:  “(Other standards impacted include FAC-003-4, Transmission Vegetation Management and PRC-023-4, Transmission Relay Loadability, Attachment B. Please see Other Standards Impacted for more detail.)”  **Implementation Plan/Page 2**  **Implementation Plan/First line**: “effected Transmission Owners” should be “affected Transmission Owners.” Corrected. Thank you.  **Implementation Plan/Second full paragraph**  The following has been added to foot note 2.  “As used herein, Path Name is used as a proper noun referring to the as-approved FAC-501-WECC-2, Attachment B, column heading “Path Name.” Path Name is not included in the NERC Glossary of Terms Used in Reliability Standards.  **Implementation Plan/Third full paragraph**  USBR recommends “That review if outside of the scope of this project” should be “That review is outside the scope of this project.” Corrected.  **Impact on Other Standards**  To meet USBR’s need, the following foot note was added.  “Version Zero documents refer to those standards first accepted as NERC Reliability Standards (Docket No. RR07-11-000, July 2007). For purposes of this project, this standard’s nomenclature from 2007 to date is sequentially PRC-STD-005-1, FAC-501-WECC-1, and FAC-501-WECC-2, all of which have the same name: Transmission Maintenance.”  **Implementation Plan/Page 3**  See General Drafting Team Comments, Attachment B and Due Process.  See also Posting 4, Response to BPA, regarding Impacts on Other Standards.  See also Attachment B in FAC-501-WECC, FAC-003 and PRC-023, please review Attachment 1A WECC-0141 Posting 1, Response to Comments—Incorporation by Reference, Responses 1-Question 10. The entire document is dedicated to the topic.[[5]](#footnote-5)  It should be highlighted that if the DT’s position is correct, breaking the incorporation by reference by changing the title will have no impact on the implementation of FAC-501-WECC. Therefore, a change to the title is non-substantive for purposes of this project.  USBR**’s Case for Due Process**  The DT notes that USBR aptly makes the case that due process continues to be a concern unless the “Major Paths” table reference is remedied.  USBR argues that the likelihood of any harm occurring outside of the Western Interconnection is slim. The core of USBR’s argument is that some degree of harm could occur. As such, where a remedy can be provided; it should be provided. When the remedy is as painless as changing a non-substantive title, the benefit of preventing the harm outweighs the burden of a non-substantive change.  USBR argues that because there is no specific reference to FAC-501-WECC in FAC-003-4, no one would think to look for changes in FAC-501-WECC that would affect FAC-003-4. USBR is precisely on point; therein lies the concern.  If the content of Attachment B changes, so does the implementation of FAC-003. Since the change would occur in FAC-501-WECC proceedings, it is highly unlikely the applicable entities in FAC-003 would engage in the change process.  See Posting 4 response to BPA at Impact of having a Single Document/Incorporation by Reference; See also Attachment B in FAC-501-WECC, FAC-003 and PRC-023, please review Attachment 1A WECC-0141 Posting 1, Response to Comments—Incorporation by Reference, Responses 1-Question 10. The entire document is dedicated to the topic.  USBR argues the content of the table could simply be found by searching the internet for “Major WECC Transfer Paths.” Again, USBR is precisely on point; therein lies the concern.  Because the entity controlling the site content can add/subtract/modify the content of the table, surfing for the table can return content that is no longer valid. This concern also holds true for the WECC website. Any WECC employee given editing rights can mistakenly alter the content of the table, replicate and relocate it, resulting in a Major WECC Transfer Path table that is no longer accurate. The resultant changes will not have been afforded due process but to the untrained reader the table would look legitimate. This is why the table must only reside in a single WECC/NERC/FERC-approved Reliability Standard and must only be changed by a WECC/NERC/FERC-approved process. When FAC-003 relies on a table located in FAC-501-WECC changes to the FAC-501-WECC self-execute to all other locations reliant on that table. | |

1. USBR comments were submitted directly to WECC via email, April 30, 2021, 9:18 a.m. (Pacific). [↑](#footnote-ref-1)
2. “On completion, the DT shall present the proposed RRS…to the WSC…with a request for [ballot]. [T]he WSC shall review the final…RRS…and determine whether it fulfills the requirements stated in the SAR. The WSC shall also consider whether extrinsic requirements, such as FERC orders, Board directives, or other regulatory directives are met by the content of the document. [I]f the WSC concludes that the proposed RRS…is not ready for ballot because it does not fulfill the requirements of the SAR or because it fails to meet other regulatory requirements or directives, the WSC shall remand the RRS…to the DT with a specific explanation identifying the deficiencies that must be remedied.” “Step 7 – Submit Proposed Draft to the WSC with a Request for Ballot. Procedures. [↑](#footnote-ref-2)
3. FERC raised the concern earlier in Docket No. RM09-9-000, Version One Regional Reliability Standards for Facilities Design, Connections, and Maintenance; Protection and Control; and Voltage and Reactive, page 13 (December 17, 2010) FERC reiterated its concern in Docket No. RM09-9-000; FERC Order No. 751, Version One Regional Reliability Standards for Facilities Design, Connections, and Maintenance; Protection and Control; and Voltage and Reactive, (Issued April 21, 2011) [↑](#footnote-ref-3)
4. FERC raised the concern earlier in Docket No. RM09-9-000, Version One Regional Reliability Standards for Facilities Design, Connections, and Maintenance; Protection and Control; and Voltage and Reactive, page 13 (December 17, 2010) FERC reiterated its concern in Docket No. RM09-9-000; FERC Order No. 751, Version One Regional Reliability Standards for Facilities Design, Connections, and Maintenance; Protection and Control; and Voltage and Reactive, (Issued April 21, 2011) [↑](#footnote-ref-4)
5. FERC raised the concern earlier in Docket No. RM09-9-000, Version One Regional Reliability Standards for Facilities Design, Connections, and Maintenance; Protection and Control; and Voltage and Reactive, page 13 (December 17, 2010) FERC reiterated its concern in Docket No. RM09-9-000; FERC Order No. 751, Version One Regional Reliability Standards for Facilities Design, Connections, and Maintenance; Protection and Control; and Voltage and Reactive, (Issued April 21, 2011) [↑](#footnote-ref-5)