# Posting 1

## Posting

This project was posted for comment from July 20 through August 19, 2022.

WECC distributed notice for the posting on July 13, 2022. The WECC-0147 Table Revision Process (Process) Drafting Team (DT) asked stakeholders to provide feedback on the proposed document(s) through a standardized WECC-provided web portal. Documents posted for comment in Posting 1 included:

* FAC-501-WECC-4, Transmission Maintenance
* Implementation Plan
* Table Revision Process (Process)

Two comments were received on the Process. No comments were received on FAC-501-WECC-4 or the Implementation Plan. The drafting team does not foresee further postings of either the Standard or the Implementation Plan.

One comment was provided through the WECC provided web portal and the other via an email attachment.

Per the WECC Reliability Standards Development Procedures (Procedures), drafting teams have the discretion to either accept or reject comments received outside of the web portal. The DT agreed to accept the comments received outside of the web portal.

WECC encourages the use of the web portal to ensure valued stakeholder comments are not misplaced, overlooked, or erroneously recorded.

## Location of Comments

Comments can be viewed in their original format on the [WECC-0149](https://www.wecc.org/Standards/pages/wecc-0149.aspx) project page under the “Submit and Review Comments” accordion.

## Changes in Response to Comment

## The preamble was updated with a note to indicate the preamble will be decoupled from the Process prior to finalization. During postings, the preamble is informational only. If the project is approved, the preamble will be used as the foundation for the NERC/FERC filing.

## The Process was changed as follows:

## “…or its successor” was added to clarify the role of the Reliability Risk Committee. “Or its successor.”

* “Path List” was deleted as redundant.
* In Section 2. Number, a footnote was added clarifying that the Process is not enforceable by a Compliance Enforcement entity.
* “Table Revision” was replaced with “Process.”
* In Section 4.1. Applicability, the Posting One footnote was deleted eliminating a specified role of the Reliability Coordinator to request changes on behalf of others.
* In Section 5.2. Documents, clarity was added by changing the sentence structure.
* In Section 6. Effective Date, “plus” was replaced with “and.”
* In Section R1.1.5., clarity was added by changing the sentence and adding an explanatory footnote illustrating the detail of “description” the applicable entity should pursue.
* In Section R3.1, “the” was added preceding “Procedures.”
* In Section R4., “complete” was inserted before “Requirement R1 technical study.”
* In Section R4.1., “…for the information” was added as a suffix to the sentence.
* In Section 4.2., a footnote was added to indicate RRC “or its successor.”
* In Section R9.1.1., “or the chair’s designee” was added.
* In Section R9.2.1., “chair” was deleted.
* In Section C. Required Approvals, a sentence was added designating the WECC Standards Committee as the document custodian.
* In Section D. Background and Guidance Section, at Posting 2 footnote 7, “Standard” was capitalized.

## Minority View

Requested changes were not made to the preamble as that section is informative only, to be used as part of the NERC filing if the project is approved.

Reclamation suggested that the word “shall” was misused. However, since Reclamation offered no alternative drafting convention, nor did Reclamation identify any specific misuse, no change was made.

Use of the phrase “Requesting Entity” was retained. The DT concluded that even though RE is an abbreviation used variously in multiple documents, its use is clearly defined in the four corners of the Process—thereby avoiding confusion.

The use of the word “requirements” was retained because the steps of the process are required to implement changes to the Table. The proposed requirements are not suggestions, nor are they voluntary as is the case for the WECC Path Rating Catalogue.

Definitions for *generic*, *specific*, *procedural*, and *substantive* were not created. Rather, the common definition for these terms is sufficient.

Changes that would create a single list of paths in all documents were not made, as doing so requires changes to the WECC Path Rating Catalogue, which is outside of the scope of this project.

## Proposed Effective Date

## The first day of the second quarter following regulatory approval of FAC-501-WECC-4, Transmission Maintenance and approval of the Table Revision Process.

## Justification

As required by the WECC Reliability Standards Development Procedures (Procedures), an implementation plan was posted with Posting 1. Details can be reviewed on the WECC-0149 project page on the Posting 1 for Comment accordion.

No comments were received addressing either the Standard or the Implementation Plan.

**Impact on Other WECC Documents**

Please see Posting 1, Section 5.2 for information regarding other documents impacted by this project. They are specified as:

1. FAC-003-4, Transmission Vegetation Management referencing the “Major WECC Transfer Path in the Bulk Electric System by WECC”;
2. FAC-501-WECC-4, Transmission Maintenance referencing the “Major WECC Transfer Paths in the Bulk Electric System (Table).”
3. PRC-023-4, Transmission Relay Loadability referencing a “major transfer path within the Western Interconnection as defined by the Regional Entity”; and,
4. The NERC Glossary of Terms Used in Reliability Standards referencing a “major transfer path within the Western Interconnection.”

## Action Plan

On August 23, 2022, the WECC-0149 Table Revision Process Drafting Team (DT) agreed by majority vote of those present to hold a DT-specific ballot asking whether the project should be posted (Posting 2) for 30-day comment.

Although the ballot was set to close no later than noon (Mountain) on September 2, 2022, on August 29, 2022, an outcome determinative majority vote was reached.

*Subsequent Entry:*

On August 29, 2022, the WECC-0149 Table Revision Process Drafting Team (DT) agreed by majority vote to post WECC-0149, Posting Two for a 30-day comment period.

Posting 2 will open September 8, 2022, and close October 10, 2022. The DT will meet on October 18, 2022, and October 25, 2022, to consider comments.

Comments can be submitted by selecting the Submit and Review Comments accordion on the [WECC-0149](https://internal.wecc.org/Standards/pages/wecc-0149.aspx) homepage. Then, click Submit Responses to Posting 2.

## Contacts and Appeals

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

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| Commenter | Organization |
| ​​Richard Jackson | U.S. Bureau of Reclamation (Reclamation) |
| Cain Braveheart (On behalf of) | Bonneville Power Administration (BPA) |

**Index to Questions, Comments, and Responses**

**Question**

1. **The drafting team invited comments on all aspects of the document.**

| Summary Consideration: | See summary in the preamble. |
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| Commenter/Comment | Response |
| Reclamation | ​Reclamation will email Shannon Black our comments for the team's consideration. |
| *The following was taken from an email attachment provided to W. Shannon Black, WECC Consultant, Standards Processes, at 10:24 a.m. (Pacific) on August 18, 2022.*  The DT appreciates Reclamation’s continued involvement in the Standards development process and encourages Reclamation to use the provided web portal to ensure Reclamation’s valued comments are neither overlooked nor rejected on Procedural grounds.  **Format/Styles**  As indicated in the preamble of Posting 1, “[t]he drafting team selected [the Standard’s format] to facilitate the comment/response cycles; and because of its familiarity to subject matter experts.”  The alternative is a prose structure not lending itself to precise comment by the industry (e.g., change the second word of the third line of the fourth paragraph under the fifth heading).  **Technical Writing / Clarity**  The DT appreciates Reclamation’s technical editing of the document, taking note that conformity of headers, stylization, abbreviations, and formats will be made in accordance with WECC’s styles guide and will be addressed by WECC’s technical editor in the latter stages of the project.  Per the Flesch-Kincaid metric, the Process is drafted at the 10.9 grade level.  **Use of the Preamble**  The preamble provided with the posting is not part of the proposed Process. It is explanatory for purposes of the posting. Portions of the preamble will be used to inform the WECC/NERC/FERC filing in the event the project moves forward.  **Path List**  The phrase “Path List” was deleted.  **Applicability Structure**  The DT opted not to make the structural change. It should be noted that because this is not a Standard, Standard’s drafting conventions are not required.  **Use of Requesting Entity – Too Confusing?**  The DT considered making changes to the nomenclature. The DT agrees with Reclamation that the abbreviation “RE” is used in other forums to represent terms other than those included herein. However, the DT also concluded that in whatever document the term is used, there is also a designated use of the term as explained by the document in which the term is used. As such, the four corners of any given document dictate how the “RE” term is used. Its use should be no more complex at implement that any other document taking the same approach.  **Compliance**  Reclamation raises the concern that confusion may reign regarding whether the Process is subject to compliance enforcement.  In addition to Section “A.2. Number: NOT APPLICABLE. THIS IS NOT A WECC/NERC STANDARD” the following footnote is added to that section clarifying that the requirements of the Table Revision Process are not subject to Compliance enforcement:  “THIS DOCUMENT IS NOT A STANDARD. This document is not enforceable by a Compliance Enforcement Authority, meaning NERC or a Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards.”  This position is reinforced by the absence of a Compliance section that is always present in all enforceable Standards.  **Required Approvals**  The following note was added to the Required Approvals section.  “This document is maintained by the WECC Standards Committee (WSC), or its successor, and is subject to review each five years following the effective date.”  **“Shall”**  Reclamation states, ““Shall” is frequently misused throughout this document;” however, Reclamation makes no specific statement as to its misuse, nor does Reclamation provide its preferred drafting convention. No changes were made based solely on this comment.  **5.2 – References/Clarity**  Reclamation suggests that Section 5.2 may be “unclear.”  The DT updated Section 5.2 as follows:  “This Process also applies to those documents listed in this section in which a derivation of the Table title is used, as approved by FERC. This Process continues to apply to documents listed in this section so long as the Table is referenced in those specified documents.”  The purpose of the second sentence is to create a self-executing severance of the Process from those documents specified in 5.2, in the event those documents cease referring to the Table.  **Effective Date**  Reclamation is concerned that use of the phrase “plus approval of the Table Revision Process” is unclear.  The sentence should be construed as follows (C = A + B): The effective date (C) is triggered upon the occurrence of (A) “approval of FAC-501-WECC-4” *plus* (B), “approval of the Table Revision Process.”  To clarify the matter, the DT offers the following:  The effective date has been changed to “[t]he first day of the second quarter following regulatory approval of FAC-501-WECC-4, Transmission Maintenance *and* this Table Revision Process.” (Emphasis added.)  **B. Process Requirements**  Reclamation is concerned that using the word “requirements” in Section B. Process Requirements and those sections that follow may create confusion with compliance requirements and associated compliance programs. Reclamation suggests replacing the word “requirements” with the word “steps.”  The DT believes the aforementioned footnote regarding compliance enforcement will address Reclamation’s concern regarding compliance confusion. Use of the term “steps” is an excellent choice; however, it fails to convey the mandatory nature of the task.  In contrast to a Reliability Standard, failure to complete a requirement called for in the Process will not result in fines or penalties; rather, failure to complete a Process requirement simply means that approval of the Requesting Entity’s request will be jeopardized.  **Specific vs Generic**  Reclamation suggests “defining what constitutes specific and generic notice” for purposes of R2 and R3.  The DT believes this concern is already addressed in R2 and R3, both by application of the common definition of those terms as well as the differentiated structure of the two requirements.  R2 is *specific* in that it requires that three *specific* entities be notified. Those entities are *specifically* listed in R2.2.1 through 2.3.  By contrast, in R3, notice is given *generically* to any entity subscribed to the WECC Standards Email List – currently standing at 450 subscribers.  Whereas R2 *specifically* identifies three entities, R3 identifies no specific entity; rather, notice is *generically* provided via a mailing list. No change was made.  **Special Note/Two Lists**  Reclamation raises concerns regarding the proposed language contained in the Background and Guidance Section:  “Special Note: Although the content of the Table and the WECC Path Rating Catalog (Catalog) are similar, changes made to either document are governed by two separate processes. Changes to the Table are governed by this Process. Changes made to the Catalog are governed by processes outside of this document.[[1]](#footnote-1) A change made to the Table does not make a change to the Catalog. A change made to the Catalog does not make a change to the Table.”  Reclamation states:  “Reclamation recommends not having two separate lists of substantially similar items as it will likely cause confusion when one is updated and the other is not, i.e., removing a path from the “Table” but not removing the same path from the Catalog.”  The DT concurs with Reclamation in that two lists will likely result.  The DT finds this an acceptable outcome as the WECC Path Rating Catalogue (containing a similar list created via a voluntary process) and the mandatory Standards in which the Table is referred have distinctly different purposes, and are governed by distinctly different development processes, which are engaged through participation in separate forums.  This clear differential of process should focus the audience’s understanding of the actions they are taking and lessen any confusion, as is the intent of the Special Note.  **Procedural vs. Substantive – Request for Definition**  Reclamation states, “Procedural and substantive concerns do not appear to be defined anywhere. Suggest defining what constitutes each type of concern and identifying who would raise and/or appeal those concern.”  The DT concluded that defining procedural versus substantive is not necessary. Rather, common definitions meet the need.  For example, the Oxford dictionary defines substantive as: “(of law) defining rights and duties as opposed to giving the rules by which such things are established.” The first half of the definition describes substantive issues whereas the latter half described procedural issues.  Neither R10 nor R11 specify who can raise a procedural (R10) or substantive (R11) concern. This is intentional. The DT concluded that limiting the right to a list of specific entities could inadvertently exclude an entity from the Process and unintentionally prohibit issues from being raised.  If approved, the WECC Standards Committee (WSC) will own the Process document, whereas the WECC Board of Directors (Board) will have oversight for Process. As such, the appellate rights provided with the Board prevail. | |

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| BPA | Applicability, Footnote 3: BPA disagrees with the DT and does not support the concept that a Generator Owner can request the Reliability Coordinator to add a path to the Major Transfer Paths in the BES list. It is an over-step of GO function and could present as a conflict of interest. BPA believes this responsibility is inherent only to the TO, TOP, and RC function/registration.  BPA finds this language confusing as to the level of detail needed to meet this step. BPA recommends adding a footnote that provides an example to show what level of detail constitutes a 'description'.  Along with the footnote, an expanded solution BPA recommends is, revising the language in R1.1.5. to state "If maintenance practices will change after a path removal, provide a description (add footnote #) here) of the revised maintenance practices."  R4.: For clarity, BPA recommends revising the language to add the word 'completed'. "Each Requesting Entity shall, at a minimum, provide the completed Requirement R1 technical study…"  R4.1.: For clarity, BPA recommends revising the language to add “for the information.”  In addition to BPA's comments above, BPA also supports the comments submitted by the US Bureau of Reclamation. Thank you for your time and consideration. |
| **Applicability, Posting 1, Footnote 3 - Reliability Coordinator authority to Assist Generator Owner**  The DT concurs with BPA and deletes the footnote. It should be noted that, with or without the footnote, an entity is not prohibited from bringing a substantive issue to the attention of any one of the applicable entities, with a request for changes to the Table.  **R1.1.5 - Level of Detail/What Constitutes a Description/Added Phrasing**  After reviewing BPA’s proposed language, the DT adopted a hybrid of BPA’s approach, as follows:  “**R1.1.5** A description of maintenance practices applicable to the path at the time of the request (FOOTNOTE HERE). If maintenance practices will change after a path removal, provide a description of the revised maintenance practices."  **FOOTNOTE:** “When determining the degree of detail used in R1.1.5 “description of maintenance practices,” the applicable entity should be guided by the level of detail reported in FAC-501-WECC-4, Transmission Maintenance, Attachment A, Transmission Maintenance and Inspection Plan (TMIP) Content.”  **R4 - Add the word “Completed”**  The DT included the word “completed.”  **R4.1 – Add “for the information”**  The DT included the phrase “for the information.”  **Re: Reclamation Comments**  Please see the above responses provided to Reclamation. | |

1. Since 1998 or earlier, changes to the WECC Path Rating Catalog have been governed by the WECC Project Coordination and Path Rating Processes (PRP). [↑](#footnote-ref-1)