# Posting 1- 45 Day NERC

The WECC-0149 FAC-501-WECC-4, Transmission Maintenance, Table Revision Process Drafting Team (DT) thanks everyone who submitted comments on the proposed project.[[1]](#footnote-1)

## Posting

This project was posted for comment by NERC from August 16, 2023, through September 29, 2023.

NERC distributed notice for the posting on August 16, 2023.

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

NERC reported there “were 12 sets of responses, including comments from approximately 17 different people from approximately 12 companies representing 4 of the Industry Segments.” After review of the NERC-provided document, WECC found responses from the ten companies and 16 persons identified in the following Table of Respondents.

## Location of Comments

All comments provided to WECC by NERC can be reviewed in their original format on the WECC-0149 project page under the “Submit and Review Comments” accordion.

## Changes in Response to Comment

After consideration of all comments received, no further changes were made to this project.

## Minority View

No minority views were raised.

**Proposed Effective Date**

The first day of the second quarter following regulatory approval of FAC-501-WECC-4, Transmission Maintenance plus approval of the Table Revision Process. A detailed Implementation Plan was posted with WECC-0149 Posting 1.

**Table of Respondents**

|  | Organization |  |
| --- | --- | --- |
| 1 | ACES Power Marketing (ACES) | Bob Soloman, Jodirah Green, Kris Carper |
| 2 | Arizona Public Service Company (APS) | Daniel Atanasovski |
| 3 | Avista Corporation | Glen Farmer, Mike Magruder, Robert Follini |
| 4 | BC Hydro and Power Authority (BC) | Adrian Andreoiu, Helen Hamilton Harding, Hootan Jarollahi |
| 5 | Bonneville Power Administration (BPA) | Cain Braveheart |
| 6 | Salt River Project (SRP) | Israel Perez |
| 7 | Tucson Electric Power (Unisource-TEP) | Jessica Cordero |
| 8 | Tri-State Generation and Transmission Association, Inc. (Tri-State) | Donna Wood |
| 9 | United States Bureau of Reclamation (USB) | Richard Jackson |
| 10 | Western Area Power Administration (WAPA) | Ben Hammer |

**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.

# Index to NERC-provided Questions, Comments, and Responses

### Question

1. Do you agree the proposed Regional Reliability Standard was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?
2. Does the proposed Regional Reliability Standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?
3. Does the proposed Regional Reliability Standard pose a serious and substantial threat to public health, safety, welfare, or national security?
4. Does the proposed Regional Reliability Standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?
5. Does the proposed Regional Reliability Standard meet at least one of the following criteria?
   1. The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.
   2. The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.
   3. The proposed regional difference is necessitated by a physical difference in the Bulk Power System.

|  |  |
| --- | --- |
| Comment Summary. For proposed changes and avenues forward, please see the preamble.  *Question 1—*Do you agree the proposed Regional Reliability Standard was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure? | |
| **Commenter** | **Comment or Response** |
| ACES | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Glen Farmer | No. I don’t feel like I can make a comment as we were not involved in the voting process. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Mike Magruder | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Robert Follini | I don’t feel like I can make a comment as we were not involved in the voting process. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BC | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| TEP—Unisource | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Tri-State | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| WAPA | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |

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| --- | --- |
| Comment Summary. For proposed changes and avenues forward, please see the preamble.  *Question 2—* Does the proposed Regional Reliability Standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection? | |
| **Commenter** | **Comment or Response** |
| ACES | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Glen Farmer | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Mike Magruder | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Robert Follini | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BC | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| TEP—Unisource | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Tri-State | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| WAPA | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |

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| Comment Summary. For proposed changes and avenues forward, please see the preamble.  *Question 3—* Does the proposed Regional Reliability Standard pose a serious and substantial threat to public health, safety, welfare, or national security? | |
| **Commenter** | **Comment or Response** |
| ACES | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | No. AZPS supports the proposed Regional Reliability Standard FAC-501-WECC-4. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Glen Farmer | No. The proposed Regional Relibaility Standard does not pose a serious and substantial threat to public health, safety, welfare, or national security. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Mike Magruder | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Robert Follini | No. The proposed Regional Relibaility Standard does not pose a serious and substantial threat to public health, safety, welfare, or national security. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BC | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| TEP—Unisource | No. TEPC [is] not on the major transmission line list so, we are unaware of the impacts. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Tri-State | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| WAPA | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |

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| Comment Summary. For proposed changes and avenues forward, please see the preamble.  *Question 4—* Does the proposed Regional Reliability Standard pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability? | |
| **Commenter** | **Comment or Response** |
| ACES | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | No. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Glen Farmer | No. The proposed Regional Relibaility Standard does not pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Mike Magruder | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Robert Follini | No. The proposed Regional Relibaility Standard does not pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BC | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| TEP—Unisource | No. TEPC [is] not on the major transmission line list so, we are unaware of the impacts. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Tri-State | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| WAPA | No |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |

|  |  |
| --- | --- |
| Comment Summary. For proposed changes and avenues forward, please see the preamble.  *Question 5—*Does the proposed Regional Reliability Standard meet at least one of the following criteria?   1. The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard. 2. The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard. 3. The proposed regional difference is necessitated by a physical difference in the Bulk Power System. | |
| **Commenter** | **Comment or Response** |
| ACES | Yes. Thank you for the opportunity to comment. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Glen Farmer | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Mike Magruder | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista—Robert Follini | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BC | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| TEP—Unisource | No. TEPC [is] not on the major transmission line list so, we are unaware if it meets any of the criteria listed. |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Tri-State | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| WAPA | Yes |
| **Response** | |
| The WECC-0149 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |

1. Per the Introduction of the WECC-0149 Standard Authorization Request, “This project is a request to augment WECC-0141, FAC-501-WECC-3, Transmission Maintenance, Attachment B, Major WECC Transfer Paths in the Bulk Electric System and its Attachment C, Revision Process.” [↑](#footnote-ref-1)