# Posting 4

## Posting

This project was posted for comment from May 11 through June 10, 2022.

WECC distributed notice for the posting on May 9, 2022. The drafting team (DT) asked stakeholders to provide feedback on the proposed document(s) through a standardized electronic template.

Two comments were received on the project.

## Location of Comments

Comments can be viewed in their original format on the [WECC-0146](https://www.wecc.org/Standards/pages/wecc-0146.aspx) project page under the “Submit and Review Comments” accordion.

## Changes in Response to Comment

Additional verbiage was added to the Rationale section in support of WR1.4. Please see the response to Bonneville Power Administration. Language included for Posting 5 review will be appended to the 1.4 Rationale section, as follows:

“For all P1 through P7 events, non-interruptible load loss initiated before voltage recovery above 80% is assumed to be voltage sensitive load or tripped by end user equipment due to the fault event. Therefore, it is not considered Non-Consequential Load Loss.

For WR1.4, non-interruptible load loss initiated after voltage recovery above 80% is assumed to be due to subsequent voltage swings. Therefore, it is considered Non-Consequential Load Loss.”

## Minority View

No minority issues were noted.

## Proposed Effective Date

The proposed effective date is the first day of the second quarter following approval by the WECC Board of Directors (Board).

## Justification

Entities may be using planning criteria other than the specified defaults. Setting the effective date as the first day of the second quarter should allow sufficient time to implement default criteria.

**Impact on Other WECC Criteria**

None.

## Action Plan

On June 16, 2022, the DT agreed to hold an email ballot, closing June 23, 2022, to confirm inclusion of the proposed Rationale language provided by Bonneville Power Administration.

If the DT does not affirm inclusion, the DT will resume meeting to address the proposed language. If the DT affirms inclusion, this project will be posted for a 30-day comment period. The proposed notice is as follows:

On June 23, 2022, the WECC-0146, TPL-001-WECC-CRT-3, Transmission System Planning Performance Drafting Team (DT) agreed by email ballot to post Posting 5 for a 30-day comment period. Once the comment period opens, comments can be submitted by selecting the Submit and Review Comments accordion on the WECC-0146 homepage. Then, click Submit Responses to Posting 5.

The posting period will open June 24, 2022, and close July 25, 2022.

The DT will meet as follows to address comments received:

* July 28, 2022, 10:00 a.m. to 12:00 p.m. Virtual
* August 4, 2022, 10:00 a.m. to 12:00 p.m. Virtual

*Subsequent Entry:*

On June 23, 2022, the DT affirmed inclusion of the language proposed by BPA, for review in Posting 5.

## 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 |
| Linda Henrickson | Arizona Public Service (AZPS) |
| Cain Braveheart | Bonneville Power Administration (BPA) |

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

**Question**

1. **The Drafting Team welcomes comments on all aspects of the document.**

| Summary Consideration: | See summary in the preamble. | |
| --- | --- | --- |
| Commenter/Comment | | Response |
| APS | | ​AZPS is supportive of the proposed changes in TPL-001-WECC-CRT-4 Posting 4. |
| The WECC-0141 Drafting Team (DT) appreciates APS’s continued participation in the Standards development process. | | |
| BPA[[1]](#footnote-1) | | As written, Requirement 1.4 appears to apply stricter performance for P1 through P7 Single-Line to Ground fault events than the P1 through P7 Three-Phase to Ground fault events, which include higher probability single element contingencies. BPA recommends the DT add the following clarification for Non-Consequential Load Loss to the Rationale for WR1.3 and WR1.4:  “For all P1 through P7 events, non-interruptible load loss initiated before voltage recovery above 80% is assumed to be voltage sensitive load or tripped by end user equipment due to the fault event. Therefore, it is not considered Non-Consequential Load Loss.  For WR1.4, non-interruptible load loss initiated after voltage recovery above 80% is assumed to be due to subsequent voltage swings. Therefore, it is considered Non-Consequential Load Loss.” |
| During the June 16, 2022, DT meeting, the DT did not reach consensus regarding inclusion of the proposed language. A DT email ballot was proposed and agreed upon to broaden review by additional subject matter experts. If the email ballot passes, the proposed language will be inserted into the Rationale section in support of 1.4. Proposed posting dates are referenced in the above Action Plan.  *Subsequent Entry:*  On June 23, 2022, the DT affirmed inclusion of the language proposed by BPA. | | |

1. On June 8, 2022, BPA submitted timely comments via WECC’s online portal. In response to a request for further clarification, BPA requested the June 8, 2022, comments be replaced with the comments provided herein. These comments were received on June 10, 2022, by W. Shannon Black, WECC Consultant, Standards Processes, via email from Cain Braveheart, BPA. [↑](#footnote-ref-1)