# Posting 5

## Posting

This project was posted for comment from June 24 through July 25, 2022.

WECC distributed notice for the posting on June 23, 2022. The drafting team (DT) asked stakeholders to provide feedback on the proposed document(s) through a standardized electronic template.

Three 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

The WR1.4 Rationale language added in Posting 5[[1]](#footnote-1) is deleted for Posting 6. No other changes were made.

Concerns were raised that the Rationale language could muddle implementation of Non-Consequential Load Loss[[2]](#footnote-2) as defined in the NERC Glossary of Terms Used in Reliability Standards.

## Minority View

Though not included in Posting 5 written comments, a verbal suggestion was offered during the Posting 5 Response to Comments that WR1.4 may no longer be required. The suggestion was not adopted.

The DT concluded that over multiple decades the language has served as the foundation for various business practices throughout the Western Interconnection. In the absence of technical justification in support of its removal, the language should be retained.

## 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 July 28, 2022, the WECC-0146, TPL-001-WECC-CRT-3, Transmission System Planning Performance Drafting Team (DT) agreed to post Posting 6 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 6.

The posting period will open August 8, 2022, and close September 7, 2022.

The DT will meet as follows to address comments received:

* September 15, 2022, 10:00 a.m. to 12:00 p.m. Virtual
* September 22, 2022, 10:00 a.m. to 12:00 p.m. Virtual

## Contacts and Appeals

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

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| Commenter | Organization |
| Adrian Andreoiu | BC Hydro (BC) |
| Gary Nolan | Arizona Public Service Company (APS) |
| Cain Braveheart | Bonneville Power Administration (BPA) |

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

**Question**

1. **Do you agree with inclusion of the proposed WR1.4 Rationale addition as provided by Bonneville Power Administration (BPA) in Posting 4 (and posted for comment in Posting 5)?**

| Summary Consideration: | See summary in the preamble. |
| --- | --- |
| Commenter/Comment | Response |
| BC | ​BC Hydro notes the addition in the Rationale section (under Requirement WR1.3 and WR1.4 subsection) of the following statement:"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."This appears inconsistent with the NERC Glossary of Terms definition of Non-Consequential Load Loss (NCLL), which excludes Loads that are (a) voltage sensitive or (b) tripped by end-user equipment. Also, this addition appears to set stricter voltage dip criteria than what is currently drafted under Requirements WR1.3 and WR1.4.BC Hydro recommends removing the Posting 5 additions to the Technical Rationale's Requirement WR1.3 and WR1.4 subsection. |
| After considering the three comments received in Posting 5, the DT opted to remove the WR1.4 Rationale language proposed in Posting 5. No other changes were made. Concerns were raised that the Rationale language could muddle implementation of Non-Consequential Load Loss as defined in the NERC Glossary of Terms Used in Reliability Standards.Restated, the proposed language may add more confusion than clarity and may open the door to less consistency in implementing the underlying requirement. |
| APS | AZPS is supportive of the addition of the below sentence but thinks that the use of a double negative within the sentence may cause confusion. AZPS recommends the following language: "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 precluded from being considered Non-Consequential Load Loss." |
| After considering the comments of all three respondents, the DT opted to remove the WR1.4 Rationale language proposed in Posting 5. No other changes were made. The DT appreciates the remedial merit of the language proposed by APS; however, with the removal of the Posting 5 language remediation is no longer required. |
| BPA | Yes. ​BPA appreciates the Drafting Team's effort and the changes made based on comments submitted to Posting 5. Thank you. |
| The DT appreciates BPA’s continued involvement in the WECC Reliability Standards Development process.  |

1. **If you disagree with including the proposed WR1.4 Rationale language, please explain your concerns and suggest a remedial course of action.**

| Summary Consideration: | See summary in the preamble. |
| --- | --- |
| Commenter/Comment | Response |
| BC | ​The addition to the Rationale section appears inconsistent with the NERC Glossary of Terms definition of Non-Consequential Load Loss (NCLL), which excludes Loads that are (a) voltage sensitive or (b) tripped by end-user equipment. Also, this addition appears to set stricter voltage dip criteria than what is currently drafted under Requirements WR1.3 and WR1.4.BC Hydro recommends removing the Posting 5 additions to the Technical Rationale's Requirement WR1.3 and WR1.4 subsection. |
| Please see the above response to BC and APS.  |
| APS | AZPS does not agree with the inclusion of the following sentence contained within the WR1.4 Rationale: "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."AZPS believes this language is too prescriptive and recommends removing it for the following reason: The addition of the above sentence creates the potential for an entity to meet WR1.4 criteria yet fail to comply with TPL-001-4 Requirements. The intent of avoiding unacceptable power swings, as desired by WR1.4, is to avoid non-consequential load loss that might occur after voltage recovery above 80%. This rationale suggests that acceptable voltage recovery as per WR 1.4 might involve non-consequential load loss that must now be identified as unacceptable performance under TPL-001 Requirements. For instance, at a given BES bus serving load, if after initial voltage recovery to 80 %, load loss of very sensitive load occurs but is still within the criteria spelled out in WR1.4, labelling that as non-consequential load loss would trigger a TPL-001 violation. |
| Please see the above response to BC and APS. |
| BPA | NA |
| The DT appreciates BPA’s continued involvement in the development of this and other WECC Criteria. |

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

| Summary Consideration: | See summary in the preamble. |
| --- | --- |
| Commenter/Comment | Response |
| BC | ​NA |
| The DT appreciates BC’s continued involvement in the development of this and other WECC Criteria. |
| APS | NA |
| The DT appreciates APS’ continued involvement in the development of this and other WECC Criteria. |
| BPA | NA |
| The DT appreciates BPA’s continued involvement in the development of this and other WECC Criteria. |

1. Posting 5 language: “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.” [↑](#footnote-ref-1)
2. Non-Interruptible Load loss that does not include: (1) Consequential Load Loss, (2) the response of voltage sensitive Load, or (3) Load that is disconnected from the System by end-user equipment. [↑](#footnote-ref-2)