## Preamble

## On July 16 2022, the following letter was posted on the WECC-0148 VAR-501-WECC-4, Power System Stabilizer home page at the Posting 1 accordion. It was also provided to the WECC Standards Committee (WSC) for its consideration during the December 6, 2022, WSC meeting.

## Recommendation

The WECC-0148 VAR-501-WECC-4 (VAR), Power System Stabilizer, Drafting Team (DT) is recommending that no changes be made to the Standard. If the WECC Standards Committee (WSC) accepts that recommendation, an information-only filing at NERC is recommended.

## Overview

On May 2, 2016, a WECC Ballot Pool approved VAR-501-WECC-3, Power System Stabilizer, after eight postings for comment. On April 28, 2017, FERC approved the Standard via letter order followed by Version 3.1 errata on September 26, 2017. Between 2016 and 2022, no known concerns were raised regarding the text the of the Standard.

On June 21, 2022, the DT began a five-year review of the Standard as required by the Procedures. On July 1, 2022, after reviewing the entire document during multiple public meetings, the DT unanimously agreed that no Substantive Changes[[1]](#footnote-1) should be made to the Standard. A straw poll from non-DT members in attendance concurred with the DT’s conclusion.

## Non-Substantive Changes

The DT is recommending the following Non-Substantive Changes:

* Updates to the document template, numbering, and boilerplate sections as provided by NERC
* Removal of stale-dated verbiage included in the Effective Date
* Removal of the redundant phrase, “[F]or auditing purposes….” From Measure M4
* Updates to syntax
* Correction of “[s]tandard” to “[S]tandard”
* Correction of “dampen” to “damp” in the Rationale and Guidance section

## Standard of Review

Per the WECC Standards Committee (WSC) Charter, the WSC administers the Procedures. Per the Procedures, each of the above proposed changes is a Non-Substantive Change[[2]](#footnote-2), and does not require a posting for comment.[[3]](#footnote-3) Although the Procedures require a ballot to make Non-Substantive Changes *after a posting for comment*[[4]](#footnote-4), the Procedures are silent where a DT recommends only Non-Substantive Changes, which require neither a posting nor a ballot.

For guidance, the Procedures provide that if the WSC identifies a Non-Substantive Change after comments are received, and/or after a ballot has opened, the “correction shall be filed for approval with NERC”, as appropriate.[[5]](#footnote-5) Further, implementing “updated document styles, templates, or standardized language…is explicitly within the purview of staff and does not require further approval.”[[6]](#footnote-6) Finally, as a matter of precedence, the WSC has previously accepted a “no change” recommendation regarding a WECC Criterion that had neither been posted nor balloted.[[7]](#footnote-7)

In light of the above, the DT requests the WSC exercise its discretion by approving the proposed Non-Substantive Changes: 1) without a posting, 2) without a ballot, 3) followed by an information-only filing at NERC.

## *Subsequent Entry*

On December 6, 2022, the WSC approved the requested Non-Substantive Changes and instructed staff to provide NERC with an information-only filing.

1. Definitions, Procedures. [↑](#footnote-ref-1)
2. Non-Substantive Changes, Definitions, Procedures, are those changes: “that do not change the scope, applicability, or intent of any requirement, including correcting the numbering of a requirement, correcting references, changes to document styles and templates, correcting the spelling of a word, adding an obviously missing word, or rephrasing a requirement for improved clarity.” [↑](#footnote-ref-2)
3. “Non-Substantive Changes do not require a posting/comment/response cycle.” Treatment of Non-Substantive Changes, Procedures, page 12. [↑](#footnote-ref-3)
4. Treatment of Substantive Changes, Procedures, pages 11-12. [↑](#footnote-ref-4)
5. “[T]he WSC agrees that the correction of the error does not change the scope or intent of the associated [Standard], and agrees that the correction has no material impact on the applicable entities, then the correction shall be filed for approval with NERC and applicable governmental authorities as appropriate.” Treatment of Non-Substantive Changes, Regional Reliability Standards, Procedures, page 12. [↑](#footnote-ref-5)
6. Procedures, page 12. [↑](#footnote-ref-6)
7. In December 2016, the WSC approved WECC-0112, COM-001-WECC-CRT-2.1, Digital Circuits Synchronization, a WECC Criterion. [↑](#footnote-ref-7)