# Posting 1—45-Day NERC

The WECC-0148 VAR-501-WECC-4, Power System Stabilizer Drafting Team (DT) thanks everyone who submitted comments on the proposed project. WECC-0148 is an information-only filing proposing no Substantive changes. [[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 9 sets of responses, including comments from approximately 14 different people from approximately 9 companies representing 4 of the Industry Segments.”

After review of the NERC-provided document, WECC found responses from seven organizations (some with member organization subcomponents), and 13 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-0148 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 proposed Standard can be implemented immediately upon receipt of final regulatory approval.

**Information Only—No Substantive Changes**

This project represents an “Information Only” filing with no Substantive changes.

Per the WECC Relibaility Standards Development Procedures (Procedures), if no Substantive changes are requested to a Regional Standard, no further due process is required. Specifically, WECC Board of Directors (Board) approval is not required.

On July 11, 2022, a list[[2]](#footnote-2) of proposed Non-Substantive changes was distributed to the Standards Email List (SEL) inviting comments or concerns to be forwarded to WECC Standards staff. A redline and a clean version of the project was posted on the WECC-0148, Posting 1 for Comment accordion. No comments were received.

On July 16, 2022, WECC posted a letter[[3]](#footnote-3) to the WSC informing the WSC of its scope and authority to address an information only filing. The letter was published to the WECC-0148 home page on the Posting 1 for Comment accordion.

On December 6, 2022, during a duly noticed WSC meeting, the WSC reviewed the letter from July 16, 2022, and was briefed on the WSC’s Procedural authority to approve the project with no further due process, so long as all changes were deemed Non-Substantive.

The WSC concurred[[4]](#footnote-4) that all proposed changes were Non-Substantive. Because the proposed changes are all Non-Substantive, the WSC also concurred that neither a posting for comment, ballot, Board approval, nor an Implementation Plan were required per the Procedures.

**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) | Andrea Jessup |
| 6 | Salt River Project (SRP) | Israel Perez |
| 7 | United States Bureau of Reclamation (USB) | Richard Jackson |

**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.

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| Comment Summary. For proposed changes and avenues forward, please see the preamble.   1. *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-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista – Glen Farmer | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista - Mike Magruder | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista - Robert Follini | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BC | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | Yes |
| **Response** | |
| The WECC-0148 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.   1. *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-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista – Glen Farmer | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista - Mike Magruder | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista - Robert Follini | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BC | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | No |
| **Response** | |
| The WECC-0148 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.   1. *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-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista – Glen Farmer | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista - Mike Magruder | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista - Robert Follini | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BC | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | No |
| **Response** | |
| The WECC-0148 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.   1. *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-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | No. |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista – Glen Farmer | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista - Mike Magruder | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista - Robert Follini | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BC | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | No |
| **Response** | |
| The WECC-0148 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.  *1) 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-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| APS | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| Avista – Glen Farmer | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates Avista’s negative response; however, Avista has failed to explain their response, identify any issues, or suggest any proposed changes. As such, the DT can neither identify nor remedy Avista’s concern. | |
| **Commenter** | **Comment or Response** |
| Avista - Mike Magruder | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates Avista’s negative response; however, Avista has failed to explain their response, identify any issues, or suggest any proposed changes. As such, the DT can neither identify nor remedy Avista’s concern. | |
| **Commenter** | **Comment or Response** |
| Avista - Robert Follini | No |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates Avista’s negative response; however, Avista has failed to explain their response, identify any issues, or suggest any proposed changes. As such, the DT can neither identify nor remedy Avista’s concern. | |
| **Commenter** | **Comment or Response** |
| BC | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| BPA | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| SRP | Yes. While there are regional and physical differences, the changes proposed are mainly grammatical and all are minor. |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |
| **Commenter** | **Comment or Response** |
| USB | Yes |
| **Response** | |
| The WECC-0148 Drafting Team (DT) appreciates each respondent’s engagement in the Standards development process. | |

1. The terms Substantive and Non-Substantive are defined terms found in the WECC Relibaility Standards Development Procedures. <https://www.wecc.org/Reliability/WECC%20Reliability%20Standards%20Development%20Procedures%20-%20FERC%20Approved%2009-13-2021.pdf> [↑](#footnote-ref-1)
2. <https://www.wecc.org/Administrative/WECC-0148%20Notice%20of%20No%20Substantive%20Change.pdf> [↑](#footnote-ref-2)
3. <https://www.wecc.org/Reliability/WECC-0148%20VAR-501-WECC-3.1%20-%20Letter%20to%20WSC%20Requesting%20Information%20Only%20Filing%20-%20FINAL.docx> [↑](#footnote-ref-3)
4. <https://www.wecc.org/Administrative/2022-03-16%20WSC%20Proposed%20Meeting%20Minutes%20for%20approval%202022-12-06-2022%20-%20FINAL%20FROM%20TECH.docx> [↑](#footnote-ref-4)