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| **Comment Report WECC-0149****FAC-501-WECC-4 Transmission Maintenance****45-Day Comment at NERC as Provided by NERC.** |

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| **Project Name:** | Regional Reliability Standard (WECC) | FAC-501-WECC-4 – Transmission Maintenance  |
| Comment Period Start Date: | 8/16/2023 |
| Comment Period End Date: | 9/29/2023 |
| Associated Ballots:  |  |

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| There were 12 sets of responses, including comments from approximately 17 different people from approximately 12 companies representing 4 of the Industry Segments as shown in the table on the following pages. |

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| **Questions** |
| **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*** **The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.**
* **The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.**
* **The proposed regional difference is necessitated by a physical difference in the Bulk Power System.**
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| **Organization Name** | **Name** | **Segment(s)** | **Region** | **Group Name** | **Group Member Name** | **Group Member Organization** | **Group Member Segment(s)** | **Group Member Region** |
| BC Hydro and Power Authority | Adrian Andreoiu | 1,3,5 | WECC | BC Hydro | Hootan Jarollahi | BC Hydro and Power Authority | 3 | WECC |
| Helen Hamilton Harding | BC Hydro and Power Authority | 5 | WECC |
| Adrian Andreoiu | BC Hydro and Power Authority | 1 | WECC |
| ACES Power Marketing | Jodirah Green | 1 | MRO,RF,SERC,Texas RE,WECC | ACES Collaborators | Bob Soloman | Hoosier Energy Electric Cooperative | 1 | RF |
| Kris Carper | Arizona Electric Power Cooperative, Inc. | 1 | WECC |

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| **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?** |
| **Glen Farmer - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| I don't feel like I can make a comment as we were not involved in the voting process.  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
| This is more of an N/A since this Standard is not applicable to TEPC. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Donna Wood - Tri-State G and T Association, Inc. - 1,3,5** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name** BC Hydro |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Richard Jackson - U.S. Bureau of Reclamation - 1,5** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Mike Magruder - Avista - Avista Corporation - 1,3,5** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Jodirah Green - ACES Power Marketing - 1 - WECC, Group Name** ACES Collaborators |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Israel Perez - Salt River Project - 1,3,5,6 - WECC** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Ben Hammer - Western Area Power Administration - 1,6** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Robert Follini - Avista - Avista Corporation - 1,3,5** |
| **Answer** |  |
| **Document Name** |  |
| **Comment** |
| I don't feel like I can make a comment as we were not involved in the voting process.  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **2. Does the proposed Regional Reliability Standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?** |
| **Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| TEPC not on the major transmission line list so, we are unaware of the impacts. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Glen Farmer - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| {C}The proposed Regional Reliability Standard does not pose an adverse impact to reliablity or commerce in a neighboring region or interconnection. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Robert Follini - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| The proposed Regional Reliability Standard does not pose an adverse impact to reliablity or commerce in a neighboring region or interconnection. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Ben Hammer - Western Area Power Administration - 1,6** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Israel Perez - Salt River Project - 1,3,5,6 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Jodirah Green - ACES Power Marketing - 1 - WECC, Group Name** ACES Collaborators |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Mike Magruder - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Richard Jackson - U.S. Bureau of Reclamation - 1,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name** BC Hydro |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Donna Wood - Tri-State G and T Association, Inc. - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
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| **3. Does the proposed Regional Reliability Standard pose a serious and substantial threat to public health, safety, welfare, or national security?** |
| **Robert Follini - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| The proposed Regional Reliability Standard does not pose a serious and substantial threat to public health, safety, welfare, or national security. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Glen Farmer - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| The proposed Regional Reliability Standard does not pose a serious and substantial threat to public health, safety, welfare, or national security. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| TEPC not on the major transmission line list so, we are unaware of the impacts. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| AZPS supports the proposed Regional Reliability Standard FAC-501-WECC-4 |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Donna Wood - Tri-State G and T Association, Inc. - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name** BC Hydro |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Richard Jackson - U.S. Bureau of Reclamation - 1,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Mike Magruder - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Jodirah Green - ACES Power Marketing - 1 - WECC, Group Name** ACES Collaborators |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Israel Perez - Salt River Project - 1,3,5,6 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Ben Hammer - Western Area Power Administration - 1,6** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
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| **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?** |
| **Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| TEPC not on the major transmission line list so, we are unaware of the impacts. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Glen Farmer - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| The proposed Regional Reliability Standard does not pose a serious and substantial burden on competitive markets within the interconneciton that is not necessary for reliability. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Robert Follini - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| The proposed Regional Reliability Standard does not pose a serious and substantial burden on competitive markets within the interconneciton that is not necessary for reliability. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Ben Hammer - Western Area Power Administration - 1,6** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Israel Perez - Salt River Project - 1,3,5,6 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Jodirah Green - ACES Power Marketing - 1 - WECC, Group Name** ACES Collaborators |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Mike Magruder - Avista - Avista Corporation - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Richard Jackson - U.S. Bureau of Reclamation - 1,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name** BC Hydro |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
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| **Donna Wood - Tri-State G and T Association, Inc. - 1,3,5** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
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| Likes 0 |  |
| Dislikes 0 |  |
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| **5. Does the proposed Regional Reliability Standard meet at least one of the following criteria*** **The proposed Regional Reliability Standard has more specific criteria for the same requirements covered in a continent-wide standard.**
* **The proposed Regional Reliability Standard has requirements that are not included in the corresponding continent-wide standard.**
* **The proposed regional difference is necessitated by a physical difference in the Bulk Power System.**
 |
| **Jessica Cordero - Unisource - Tucson Electric Power Co. - 1 - WECC** |
| **Answer** | No |
| **Document Name** |  |
| **Comment** |
| TEPC not on the major transmission line list so, we are unaware if it meets any of the criteria listed. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Jodirah Green - ACES Power Marketing - 1 - WECC, Group Name** ACES Collaborators |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
| Thank you for the opportunity to comment. |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Donna Wood - Tri-State G and T Association, Inc. - 1,3,5** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name** BC Hydro |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Robert Follini - Avista - Avista Corporation - 1,3,5** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Glen Farmer - Avista - Avista Corporation - 1,3,5** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Richard Jackson - U.S. Bureau of Reclamation - 1,5** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Mike Magruder - Avista - Avista Corporation - 1,3,5** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Israel Perez - Salt River Project - 1,3,5,6 - WECC** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Ben Hammer - Western Area Power Administration - 1,6** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |
| **Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6** |
| **Answer** | Yes |
| **Document Name** |  |
| **Comment** |
|  |
| Likes 0 |  |
| Dislikes 0 |  |
| **Response** |
|  |

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