# Posting 3

## Posting

This project was posted for comment from January 26, 2024, through February 26, 2024.

WECC distributed notice for the posting on January 25, 2024. The WECC-0153 INT Consolidated criterion (ICC) Drafting Team (DT) asked stakeholders to provide feedback on the proposed document(s) through a standardized WECC-provided web portal.

Two comments were received. Neither requested changes to the project.

## Location of Comments

Comments can be viewed in their original format on the [WECC-0153](https://www.wecc.org/Standards/pages/wecc-0153.aspx)  project page under the “Submit and Review Comments” accordion.

## Changes in Response to Comment

Per the WECC-0153 Standard Authorization Request (SAR), the DT was asked to consider updating the numbering nomenclature of the document.[[1]](#footnote-1) The goal of renumbering was to eliminate ambiguity as to the numbering voids between the ICC sections. After considering the practical application, renumbering was not pursued.

Each INT nomenclature has multiple parts. For example, in INT-001-WECC-CRT-5, the prefix (INT-001-WECC-CRT) indicates content and document type, whereas the suffix (-5) indicates which version is presented. Although the prefix could be renumbered sequentially, if the suffix were renumbered starting back at “1”, duplicative document numbers would result. If the version number for INT-001-WECC-CRT-5 was reset to “1”, that designation would duplicate the 2009 version of the same document.

Rather than renumber with exceptions, the following clarifying language was added to the preamble:

“Voids exist in the ICC numbering sequence because sections were previously tied to NERC Standards. As NERC retires its INT Standards and WECC retires or reorganizes its associated documents, numbering voids were created. These voids do not represent missing INT-CRTs.”

## Minority View

## There was no minority position.

## Implementation Plan—Justification

*Proposed Effective Date*

The proposed effective date is the first day of the second quarter following regulatory approval.

*Justification*

Because the proposed changes to the ICC are minimal, the ICC can be implemented without undue burden or delay. The DT did not identify any other WECC Criteria, Standards, or NAESB documents that would be impacted if the proposed ICC where adopted.

## Action Plan

On February 28, 2024, the WECC-0153 INT Consolidation Criterion Drafting Team agreed by majority vote to forward the project to the WECC Standards Committee (WSC) with a request for ballot. The project will be forwarded to the WSC with a request to approve for balloting.

## 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.

|  |  |
| --- | --- |
| Commenter | Organization |
| Adrian Andreoiu | BC Hydro |
| Raj Hundal | Powerex |

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

**Question**

1. **The drafting team invited comments on all aspects of the document.**

| Summary Consideration: | See summary in the preamble. |
| --- | --- |
| Commenter/Comment | Response |
| BC Hydro | ​BC Hydro thanks the drafting team for their efforts and is in support of the revisions in this Posting 3. |
| The drafting team thanks BC Hydro for its continued involvement in the Standards development process. | |
| Powerex | ​Powerex appreciates the drafting team addressing our comments in the previous posting. Powerex has no further comments. Thank you. |
| The drafting team thanks Powerex for its continued involvement in the Standards development process. | |

1. Because various INTs have been retired or consolidated over time, the 11 INTs incorporated are not numbered sequentially. For example, INT-“002”-CRT-WECC no longer exists. This sequential void could lead to confusion on the part of new and future entrants to the industry. To remedy the concern, the drafting team should consider whether this is an appropriate time to sequentially renumber the segments of the ICC. If this approach is adopted, the history table could include a cross-reference from old to new. [↑](#footnote-ref-1)