

Attachment N—Final Ballot Results

WECC-0142

Request to Retire BAL-002-WECC-3, Contingency Reserve

Ballot Name: WECC-0142: Request to Retire BAL-002-WECC-3, Contingency Reserve

Overview: This project comes from a request that the Reliability Standard BAL-002-WECC-3 be retired in its entirety. The drafting team has written a white paper with justification to do so, and this white paper was put out for industry comment. The result of that comment period was 100% support for the retirement of the Standard based on the rationale presented in the white paper.

Ballot Pool Open: 04/13/2025 **Ballot Pool Closed:** 04/28/2025

Ballot Opened: 05/01/2025 **Ballot Closed:** 05/15/2025

Total Ballot Pool: 57 **Total Votes:** 53

Quorum: 93.0% **Weighted Votes:** 100%

Ballot Results: Pass

Voting Sectors	Total in Ballot Pool	In-Pool Affiliates Excluded	Votes Non-Abstain	Sector Weight	Yes Votes	Weighted Segment Vote	No Votes	Abstain	Total Votes for Quorum	Did Not Vote
Transmission Owners	15		13	1	13	100.0%	0	1	14	1
Regional Transmission Organizations (RTO) and Independent System Operators (ISO)	2		1	0.1	1	10.0%	0	1	2	0
Load-Serving Entities (LSE)	11		10	1	10	100.0%	0	1	11	0
Transmission Dependent Utilities (TDU)	5		5	0.5	5	50.0%	0	0	5	0
Electric Generators	12		9	0.9	9	90.0%	0	1	10	2
Electricity Brokers, Aggregators, and Marketers	12		10	1	10	100.0%	0	1	11	1
Large Electricity End Users	0		0	0	0	0.0%	0	0	0	0
Small Electricity Users	0		0	0	0	0.0%	0	0	0	0
Federal, State, Provincial Regulatory, other Gov. Entities	0		0	0	0	0.0%	0	0	0	0
Regional Entities	0		0	0	0	0.0%	0	0	0	0
Totals	57	0	48	4.5	48	100.0%	0	5	53	4

Title	Company	Sector	Vote	Comments Submitted	Name of Voter
WECC-0142	Arizona Public Service Company	Transmission Owners	Abstain		Daniela Atanasovski
WECC-0142	Arizona Public Service Company	Load-Serving Entities (LSEs)	Abstain		Jessica Lopez
WECC-0142	Arizona Public Service Company	Electric Generators	Abstain		Andrew Smith
WECC-0142	Arizona Public Service Company	Electricity Brokers, Aggregators, and Marketers	Abstain		Marcus Bortman
WECC-0142	Black Hills Corporation	Transmission Owners	Yes	Black Hills Corporation supports the rationale presented in the Drafting Team's white paper requesting that BAL-002-WECC-3 be retired.	Josh Schumacher
WECC-0142	Black Hills Corporation	Load-Serving Entities (LSEs)	Yes	Black Hills Corporation supports the rationale presented in the Drafting Team's white paper requesting that BAL-002-WECC-3 be retired.	Josh Schumacher
WECC-0142	Black Hills Corporation	Electric Generators	Yes	Black Hills Corporation supports the rationale presented in the Drafting Team's white paper requesting that BAL-002-WECC-3 be retired.	Josh Schumacher



WECC-0142	Black Hills Corporation	Electricity Brokers, Aggregators, and Marketers	Yes	Black Hills Corporation supports the rationale presented in the Drafting Team's white paper requesting that BAL-002-WECC-3 be retired.	Josh Schumacher
WECC-0142	California Independent System Operator	Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs)	Yes		Darcy O'Connell
WECC-0142	Puget Sound Energy, Inc	Transmission Owners	Yes		Anna Lavik
WECC-0142	Puget Sound Energy, Inc	Load-Serving Entities (LSEs)	Yes		Anna Lavik
WECC-0142	Puget Sound Energy, Inc	Electric Generators	No Vote		Kellie Anderson
WECC-0142	Public Utility District No. 2 of Grant County	Transmission Owners	Yes		Joanne Anderson
WECC-0142	Public Utility District No. 2 of Grant County	Load-Serving Entities (LSEs)	Yes		Joanne Anderson
WECC-0142	Public Utility District No. 2 of Grant County	Electric Generators	Yes		Joanne Anderson



WECC-0142	Public Utility District No. 2 of Grant County	Electricity Brokers, Aggregators, and Marketers	Yes		Joanne Anderson
WECC-0142	Xcel Energy – PSCo	Transmission Owners	No Vote		Joseph Gatten
WECC-0142	Xcel Energy – PSCo	Electricity Brokers, Aggregators, and Marketers	No Vote		Joseph Gatten
WECC-0142	Bonneville Power Administration	Electricity Brokers, Aggregators, and Marketers	Yes		Tanner Brier
WECC-0142	Bonneville Power Administration	Load-Serving Entities (LSEs)	Yes		Ron Sporseen
WECC-0142	Bonneville Power Administration	Electric Generators	Yes		Milli Chennell
WECC-0142	Bonneville Power Administration	Transmission Owners	Yes		Kammy Rogers-Holliday
WECC-0142	Tacoma Power	Transmission Owners	Yes	This change is needed in order to align the Western Interconnection with the other regions. Tacoma Power strongly supports this initiative.	Jennie Wike
WECC-0142	Tacoma Power	Load-Serving Entities (LSEs)	Yes	See previous comments.	Jennie Wike
WECC-0142	Tacoma Power	Transmission Dependent Utilities (TDUs)	Yes	See previous comments.	Jennie Wike



WECC-0142	Tacoma Power	Electric Generators	Yes	See previous comments.	Jennie Wike
WECC-0142	Tacoma Power	Electricity Brokers, Aggregators, and Marketers	Yes	See previous comments.	Jennie Wike
WECC-0142	Southwest Power Pool	Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs)	Abstain	As stated in the white paper “[t]here has never been a technical study proving that holding reserves more than that required under NERC BAL-002-X enhances the reliability of the Western Interconnection,” which makes it difficult to determine whether NERC BAL-002-X is sufficient to support reliability in the Western Interconnect. Accordingly, SPP would agree to retire WECC BAL-002-3 if a study is performed to show that there is adequate availability and deliverability of reserves under NERC BAL-002-X.	Alan Wahlstrom
WECC-0142	Powerex, Inc.	Electricity Brokers, Aggregators, and Marketers	Yes		Raj Hundal



WECC-0142	British Columbia Hydro and Power Authority	Transmission Owners	Yes	<p>BC Hydro is supportive of this Standard's retirement and appreciates the opportunity to comment.</p> <p>BC Hydro requests that the implementation of Standard retirement have an associated timeline of at least two calendar quarters. This would allow all entities that are part of the same Reserve Sharing Group to have the same retirement date of BAL-002-WECC. Specifically, the implementation time would allow for a retirement date in British Columbia in alignment with the US.</p>	Adrian Andreoiu
WECC-0142	British Columbia Hydro and Power Authority	Load-Serving Entities (LSEs)	Yes	<p>BC Hydro is supportive of this Standard's retirement and appreciates the opportunity to comment.</p> <p>BC Hydro requests that the implementation of Standard retirement have an associated timeline of at least two calendar quarters. This would allow all entities that are part of the same Reserve Sharing Group to have the same retirement date of BAL-002-WECC. Specifically, the implementation time would allow for a</p>	Adrian Andreoiu



				retirement date in British Columbia in alignment with the US.	
WECC-0142	British Columbia Hydro and Power Authority	Electric Generators	Yes	<p>BC Hydro is supportive of this Standard’s retirement and appreciates the opportunity to comment.</p> <p>BC Hydro requests that the implementation of Standard retirement have an associated timeline of at least two calendar quarters. This would allow all entities that are part of the same Reserve Sharing Group to have the same retirement date of BAL-002-WECC. Specifically, the implementation time would allow for a retirement date in British Columbia in alignment with the US.</p>	Adrian Andreoiu
WECC-0142	Tucson Electric Power	Transmission Owners	Yes		Jessica Cordero
WECC-0142	Western Power Pool	Transmission Dependent Utilities (TDUs)	Yes	My compliments to the Drafting Team that completed the whitepaper. Their hard work and diligence have paid off!	Kevin Conway



WECC-0142	Public Utility District No. 1 of Chelan County	Transmission Owners	Yes	<p>1. Redundant Reserve Requirements Without Demonstrated Benefit BAL-002-WECC-3 requires entities to maintain Contingency Reserve equal to the greater of their Most Severe Single Contingency (MSSC) or 3% of generation plus 3% of load. In contrast, the continent-wide standard, BAL-002-3, ensures reliable system performance by requiring sufficient reserves to recover from an MSSC event. Requiring additional reserves beyond the MSSC needlessly restricts the use of resources that could otherwise support resource adequacy, and may contribute to artificial scarcity in energy markets—without any demonstrated improvement in reliability.</p> <p>2. Overly Restrictive 60-Minute Usage Window BAL-002-WECC-3 limits the use of Contingency Reserve to just 60 minutes following an event, forcing entities to schedule emergency power outside the standard hourly market timeline. Aligning with BAL-002-3's more flexible timeline would enable entities to rely on normal hourly scheduling processes, improving market efficiency and reducing the need for manual interventions.</p> <p>3. Lack of Data-Driven Justification There is no empirical evidence that the reserve requirements under</p>	Rebecca Zahler
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				<p>BAL-002-WECC-3 result in materially improved reliability outcomes beyond what is achieved through BAL-002-3 and other applicable NERC reliability standards. The existing continent-wide standard has proven sufficient, particularly in the Eastern Interconnection, for maintaining reliable operations. 4. Supports Harmonization and Reduces Regulatory Burden Retiring BAL-002-WECC-3 promotes consistency and harmonization across the ERO, helping to avoid regional compliance fragmentation. This action is consistent with the ERO Enterprise's goal of reducing regulatory burden by eliminating low-value or duplicative standards that no longer serve a unique or necessary purpose.</p>	
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WECC-0142	Public Utility District No. 1 of Chelan County	Load-Serving Entities (LSEs)	Yes	<p>1. Redundant Reserve Requirements Without Demonstrated Benefit BAL-002-WECC-3 requires entities to maintain Contingency Reserve equal to the greater of their Most Severe Single Contingency (MSSC) or 3% of generation plus 3% of load. In contrast, the continent-wide standard, BAL-002-3, ensures reliable system performance by requiring sufficient reserves to recover from an MSSC event. Requiring additional reserves beyond the MSSC needlessly restricts the use of resources that could otherwise support resource adequacy, and may contribute to artificial scarcity in energy markets—without any demonstrated improvement in reliability.</p> <p>2. Overly Restrictive 60-Minute Usage Window BAL-002-WECC-3 limits the use of Contingency Reserve to just 60 minutes following an event, forcing entities to schedule emergency power outside the standard hourly market timeline. Aligning with BAL-002-3's more flexible timeline would enable entities to rely on normal hourly scheduling processes, improving market efficiency and reducing the need for manual interventions.</p> <p>3. Lack of Data-Driven Justification There is no empirical evidence that the reserve requirements under</p>	Rebecca Zahler
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WECC-0142	Public Utility District No. 1 of Chelan County	Electric Generators	Yes	<p>1. Redundant Reserve Requirements Without Demonstrated Benefit BAL-002-WECC-3 requires entities to maintain Contingency Reserve equal to the greater of their Most Severe Single Contingency (MSSC) or 3% of generation plus 3% of load. In contrast, the continent-wide standard, BAL-002-3, ensures reliable system performance by requiring sufficient reserves to recover from an MSSC event. Requiring additional reserves beyond the MSSC needlessly restricts the use of resources that could otherwise support resource adequacy, and may contribute to artificial scarcity in energy markets—without any demonstrated improvement in reliability.</p> <p>2. Overly Restrictive 60-Minute Usage Window BAL-002-WECC-3 limits the use of Contingency Reserve to just 60 minutes following an event, forcing entities to schedule emergency power outside the standard hourly market timeline. Aligning with BAL-002-3's more flexible timeline would enable entities to rely on normal hourly scheduling processes, improving market efficiency and reducing the need for manual interventions.</p> <p>3. Lack of Data-Driven Justification There is no empirical evidence that the reserve requirements under</p>	Rebecca Zahler
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WECC-0142	Public Utility District No. 1 of Chelan County	Electricity Brokers, Aggregators, and Marketers	Yes	<p>1. Redundant Reserve Requirements Without Demonstrated Benefit BAL-002-WECC-3 requires entities to maintain Contingency Reserve equal to the greater of their Most Severe Single Contingency (MSSC) or 3% of generation plus 3% of load. In contrast, the continent-wide standard, BAL-002-3, ensures reliable system performance by requiring sufficient reserves to recover from an MSSC event. Requiring additional reserves beyond the MSSC needlessly restricts the use of resources that could otherwise support resource adequacy, and may contribute to artificial scarcity in energy markets—without any demonstrated improvement in reliability.</p> <p>2. Overly Restrictive 60-Minute Usage Window BAL-002-WECC-3 limits the use of Contingency Reserve to just 60 minutes following an event, forcing entities to schedule emergency power outside the standard hourly market timeline. Aligning with BAL-002-3's more flexible timeline would enable entities to rely on normal hourly scheduling processes, improving market efficiency and reducing the need for manual interventions.</p> <p>3. Lack of Data-Driven Justification There is no empirical evidence that the reserve requirements under</p>	Rebecca Zahler
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WECC-0142	Sacramento Municipal Utility District (SMUD)	Transmission Owners	Yes	<p>SMUD supports retiring the WECC regional reliability standard BAL-002-WECC-3. We believe that the NERC reliability standard BAL-002-3 adequately ensures the timely recovery of Area Control Error (ACE) for Balancing Authorities and Reserve Sharing Groups, which is essential for maintaining the reliability of the Bulk Power System.</p>	Tim Kelley



WECC-0142	Sacramento Municipal Utility District (SMUD)	Load-Serving Entities (LSEs)	Yes	SMUD supports retiring the WECC regional reliability standard BAL-002-WECC-3. We believe that the NERC reliability standard BAL-002-3 adequately ensures the timely recovery of Area Control Error (ACE) for Balancing Authorities and Reserve Sharing Groups, which is essential for maintaining the reliability of the Bulk Power System.	Tim Kelley
WECC-0142	Sacramento Municipal Utility District (SMUD)	Transmission Dependent Utilities (TDUs)	Yes	SMUD supports retiring the WECC regional reliability standard BAL-002-WECC-3. We believe that the NERC reliability standard BAL-002-3 adequately ensures the timely recovery of Area Control Error (ACE) for Balancing Authorities and Reserve Sharing Groups, which is essential for maintaining the reliability of the Bulk Power System.	Tim Kelley
WECC-0142	Sacramento Municipal Utility District (SMUD)	Electric Generators	Yes	SMUD supports retiring the WECC regional reliability standard BAL-002-WECC-3. We believe that the NERC reliability standard BAL-002-3 adequately ensures the timely recovery of Area Control Error (ACE) for Balancing Authorities and	Tim Kelley



				Reserve Sharing Groups, which is essential for maintaining the reliability of the Bulk Power System.	
WECC-0142	Sacramento Municipal Utility District (SMUD)	Electricity Brokers, Aggregators, and Marketers	Yes	SMUD supports retiring the WECC regional reliability standard BAL-002-WECC-3. We believe that the NERC reliability standard BAL-002-3 adequately ensures the timely recovery of Area Control Error (ACE) for Balancing Authorities and Reserve Sharing Groups, which is essential for maintaining the reliability of the Bulk Power System.	Tim Kelley
WECC-0142	Balancing Authority of Northern California (BANC)	Transmission Owners	Yes	BANC supports retiring the WECC regional reliability standard BAL-002-WECC-3. We believe that the NERC reliability standard BAL-002-3 adequately ensures the timely recovery of Area Control Error (ACE) for Balancing Authorities and Reserve Sharing Groups, which is essential for maintaining the reliability of the Bulk Power System.	Tim Kelley



WECC-0142	Balancing Authority of Northern California (BANC)	Electricity Brokers, Aggregators, and Marketers	Yes	BANC supports retiring the WECC regional reliability standard BAL-002-WECC-3. We believe that the NERC reliability standard BAL-002-3 adequately ensures the timely recovery of Area Control Error (ACE) for Balancing Authorities and Reserve Sharing Groups, which is essential for maintaining the reliability of the Bulk Power System.	Tim Kelley
WECC-0142	Seattle City Light	Transmission Dependent Utilities (TDUs)	Yes		Hao Li
WECC-0142	Avista Corp.	Transmission Owners	Yes	This request to retire BAL-002-WECC-3 in favor of following the continent-wide Reliability Standard NERC BAL-002-3 is justified and needed for the Western Interconnection. The simple facts clearly articulated in the White Paper that system reliability is not impacted negatively by this change, and is likely enhanced, while ensuring better use of existing generating resources, both variable and base, should be clear enough justification to retire BAL-002-WECC-3.	Mike Magruder



WECC-0142	Avista Corp.	Electric Generators	No Vote		Glen Farmer
WECC-0142	Salt River Project	Transmission Owners	Yes	SRP agrees to retire the standard.	Israel Perez
WECC-0142	Salt River Project	Load-Serving Entities (LSEs)	Yes	SRP agrees to retire the standard.	Israel Perez
WECC-0142	Salt River Project	Electric Generators	Yes	SRP agrees to retire the standard.	Israel Perez
WECC-0142	Salt River Project	Electricity Brokers, Aggregators, and Marketers	Yes	SRP agrees to retire the standard.	Israel Perez
WECC-0142	Imperial Irrigation District	Transmission Owners	Yes		Sammy Alcaez
WECC-0142	Imperial Irrigation District	Load-Serving Entities (LSEs)	Yes		Sammy Alcaez
WECC-0142	Imperial Irrigation District	Electric Generators	Yes		Sammy Alcaez
WECC-0142	Imperial Irrigation District	Transmission Dependent Utilities (TDUs)	Yes		Sammy Alcaez
WECC-0142	Imperial Irrigation District	Electricity Brokers, Aggregators, and Marketers	Yes		Sammy Alcaez

