



**WECC**

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**Posting One**

**Reliability Standards Development Procedures**

WECC Standards Department

WECC Standards Committee

FERC Approved: September 13, 2021

## Introduction

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WECC is a Regional Entity<sup>1</sup> authorized through a delegation agreement with NERC pursuant to Section 215 of the Federal Power Act. NERC delegates designated powers, rights, and responsibilities to WECC regarding the administration within the Western Interconnection of electric Reliability Standards adopted or approved by NERC and FERC.<sup>2</sup>

These Reliability Standards Development Procedures (Procedures) define the process WECC is to use to develop, modify, retire, and interpret Regional Reliability Standards (RRS) and WECC Regional Criteria (CRT).

These Procedures establish an open and transparent process for the development of WECC RRSs and CRTs. These Procedures include public notice of intent to develop RRSs and CRTs, a public comment period on the proposed documents, due consideration of comments provided, and a balanced Ballot Body.

The Procedures shall be interpreted and applied in a manner consistent with the WECC Bylaws. Should any conflict arise between the Procedures and the bylaws, the bylaws will prevail.

## Definitions

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### Affirmative Fractional Majority Vote

The voting percentage used to determine whether an RRS or CRT has been approved.<sup>3</sup>

### Ballot Body

That body of qualified people registered with WECC for participation in Ballot Pools.

### Ballot Pool

That pool of Ballot Body entities registered to vote on a specific document.

### Drafting Team (DT)

A team of pertinent subject matter experts (SME) appointed by the WECC Standards Committee (WSC) to—

- Develop the document(s) called for in a Standard Authorization Request (SAR),

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<sup>1</sup> “Regional Entity” means an entity having enforcement authority pursuant to 18 C.F.R. § 39.8.” NERC ROP, Appendix 2 to the NERC Rules of Procedure, page 18. Effective: June 8, 2018.

<sup>2</sup> Unless otherwise specified, capitalized terms are defined in the NERC Glossary of Terms Used in Reliability Standards.

<sup>3</sup> See Step 9.



- Consider and respond to industry comments,
- Participate in forums to help build consensus on draft documents, and
- Perform other tasks as assigned by the WSC.

### **NERC Compliance Registry**

Registry of the Bulk Electric System owners, operators, and users that are subject to approved reliability standards.

### **Non-Substantive Changes**

Revisions 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.

### **Regional Criteria (CRT)**

As defined in the NERC Rules of Procedure (ROP).

### **Regional Reliability Standard (RRS)**

As defined in the NERC ROP. For purposes of this document, RRS is interchangeable with Regional Variance (RV) as defined in the ROP.

### **Standard Authorization Request**

The WECC form titled Standard Authorization Request administered by the WECC Standards Department for requesting development, modification, retirement, interpretation, or other disposition of an RRS or CRT.

### **Standards Briefing**

Any meeting initiated by WECC for creating an open forum for discussion and explanation of an RRS or CRT; generally, but not exclusively, held during the development process of those documents in advance of a ballot window.

### **Standards Email List (SEL)**

Email list(s) established and maintained by WECC for communicating due process activity; generally, but not exclusively, for standards-related activities.

### **Substantive Changes**

A change that alters the scope, applicability, required actions, or intent of the document.



## Reliability Standards Development Procedures

### WECC Standards Committee (WSC)

The committee established by the WECC Board of Directors (Board) for overseeing the implementation of these Procedures pursuant to its Board-approved charter.



## Overview

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This document has two primary sections. The first section describes the steps to be taken during development of an RRS or CRT, absent exceptional circumstances. The second section augments the first with Supporting Processes to address exceptions like an expedited process for urgent actions, addressing regulatory directives, and maintenance of certain documents.

## Development Steps

The following steps are included in the development of an RRS or CRT, absent exceptional circumstances. Click on any item below to display details on how to complete the step.

<b>Step 1—Submit and Validate a Standard Authorization Request</b> .....	7
<b>Step 2—Complete SAR and Present to the WSC</b> .....	7
<b>Step 3—Convene the Drafting Team</b> .....	8
<b>Step 4—Begin Drafting Phase and Submit Draft to WSC</b> .....	9
<b>Step 5—Post for Comment</b> .....	10
<b>Step 6—Respond to Comments</b> .....	11
<b>Step 7—Submit Proposed Draft to the WSC with a Request for Ballot</b> .....	13
<b>Step 8—Convene a Standards Briefing</b> .....	13
<b>Step 9—Form the Ballot Pool and Ballot the Standard</b> .....	14
<b>Step 10—Initiate the Appeals Process—If Needed</b> .....	17
<b>Step 11—Obtain Board Approval</b> .....	17
<b>Step 12—Submit for NERC and FERC Approval and Implementation</b> .....	17
<b>Step 13—Retire a CRT</b> .....	18
<b>Step 14—Submit a Request for Interpretation</b> .....	18

The following related processes are included in the Supporting Processes section:

- Expedited Process for Urgent Action
- Regulatory Directives
- Maintenance of the Procedures
- Maintenance of RRSs and CRTs
- Field Tests



### Notices and Counting of Days

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Notices required under these Procedures shall be distributed electronically via WECC's SEL(s) and deemed delivered when dispatched.

Concurrent running of notice and posting periods is explicitly allowed.

WECC shall provide notice to NERC of all standards-related activities by including NERC on WECC's SEL. Inclusion of a NERC-provided email address on the related SEL shall constitute coordination of notice to NERC of standards-related activities and shall be deemed delivered when dispatched via the SEL(s).

Any person may receive notices provided via the SEL.

All references to days are calendar days. When counting the number of days, the count shall exclude the first day of the time window to be measured. If a terminus date falls on a weekend or a day that WECC is scheduled to be closed, the new terminus date shall be the day following the weekend or WECC closure day.

For example, if a 14-day period ends on a holiday, then the terminus date is on the following WECC business day.

### WECC Standards Committee

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The WSC oversees the implementation of these Procedures. The WSC protects the integrity and credibility of the Procedures while acting in accordance with the WSC Charter. Delineation of specific WSC duties, WSC composition and governance, WSC voting privileges, and other related practices, is included in the WSC Charter, as approved by the Board.

### WECC Standards Voting Segments

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WECC's Standards Voting Segment (SVS) shall be the same as those established by NERC.<sup>4</sup> A qualifying entity may register and cast a ballot in any SVS(s) for which it qualifies.

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<sup>4</sup> NERC currently establishes its SVS in the NERC Rules of Procedure, Appendix 3D—Development of the Registered Ballot Body. If the SVSs in that appendix or its successor should vary from time to time, it is the intent of these Procedures that WECC's SVSs will mirror those of NERC without requiring further change to the Procedures to accommodate those changes.



## Process for Developing Regional Reliability Standards, Regional Criteria, and Interpretations

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### Step 1—Submit and Validate a Standard Authorization Request

Development, revision, retirement, or interpretation of an RRS or CRT shall be initiated by filing a SAR by any person or entity. A SAR is filed by completing the electronic fields of the online WECC SAR form. WECC staff shall review the incoming SAR to ensure it is valid.<sup>5</sup> Once deemed valid, the SAR shall be posted on the WECC website and notification will be sent to the SEL.

### Step 2—Complete SAR and Present to the WSC

WECC staff shall assign a unique tracking number to each SAR. The unique tracking number shall be used to identify the SAR throughout the development and archival processes. The SAR and those documents developed in response to the SAR shall be publicly accessible on the WECC website throughout the development process. WECC staff shall determine within 30 days of receiving a SAR whether it is complete. WECC staff may assist with completing the SAR, or report to the WSC that it is incomplete and request guidance.

To be deemed complete, each SAR shall contain a description of the proposed RRS or CRT subject matter sufficiently detailed to define the purpose, scope, affected parties, requirements, and any other information relevant to the proposed RRS or CRT. Once WECC staff agrees the SAR is complete, WECC staff shall place the SAR on the agenda for the next scheduled WSC meeting for disposition, subject to required notice. Notice of WSC meetings and posting of WSC agendas will be provided according to the WSC Charter.

The WSC shall determine whether the SAR is within the scope of WECC's authority and activities and is appropriate for development. Public comment on the SAR will be reviewed and considered by the WSC during a duly noticed WSC meeting prior to the WSC approving the SAR.

The WSC shall make the above determination within 90 days of the date that the SAR is received by WECC, except where the SAR has been remanded, in which case the WSC shall make that determination within 30 days of receiving the curative SAR.

The WSC shall ensure that the SAR provides enough information that a DT will have a clear understanding of the reasons for, and nature of, the RRS or CRT to be developed. The SAR author may be asked to assist further in the development or clarification of the SAR.

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<sup>5</sup> A "valid" SAR is different than a "complete" SAR. A SAR is deemed valid by staff as a threshold review that filters out spam and unwanted nuisance documents that may be received via an open website portal. Whether a SAR is "complete" is addressed in Step 2.



The WSC may accept the SAR, in which case development proceeds to Step 3.

The WSC may remand a SAR if it determines the content of the SAR is deficient. If the SAR is deemed deficient, the WSC shall specify the deficiency identified in the SAR and suggest potential remedies as part of its remand. WECC staff will make reasonable efforts to assist the SAR author in addressing the deficiencies identified by the WSC.

The SAR author shall have 30 days from the date of remand or until the sixtieth day following submittal of the SAR, whichever is longer, to remedy each deficiency identified in the remand, or withdraw the SAR.

If the deficiencies are remedied, WECC staff will resubmit the SAR to the WSC for disposition. If the deficiencies are not remedied within the allotted period: 1) the SAR will be deemed incomplete, 2) no further developmental action will be taken on the SAR, and 3) the SAR will be archived. The SAR author may submit a new SAR without prejudice based on the same or similar fact pattern.

The WSC may reject a SAR if it determines the SAR is outside the scope of WECC's authority or is not appropriate to be undertaken by WECC. If a SAR is rejected, the WSC shall post its explanation for rejection on the WECC website. Notification of the WSC's decision shall:

1. Be communicated to the SAR author, the Board, and the SEL;
2. Reference the unique SAR tracking number and direct the recipient to supporting information as appropriate; and
3. Be made no more than 30 days from the date of the WSC's determination.

### **Step 3—Convene the Drafting Team**

If it accepts a SAR, the WSC may, at its discretion, expand or narrow the scope of the SAR at any time during the development process prior to approving the project for ballot. The WSC shall prioritize the development of the SAR in relation to other RRSs or CRTs proposed for development under the Procedures, as may be required based on the volume of requests and available resources. If prioritization dictates a postponed starting date, the WSC shall either set a postponed starting date or set a review date at which the WSC shall re-evaluate the SAR for purposes of its progress through these Procedures. In no case shall the review date be more than 180 days after the date the SAR was received.

Upon establishing a start date for the development of an RRS or CRT, the WSC shall convene a DT to develop the RRS or CRT required by the SAR.

The WSC may either directly assign a DT or solicit team member nominations from the industry. When multiple DT nominees from the same entity seek assignment to the same DT, that assignment is permissible; however, the represented entity has only one vote on matters determined solely by the DT. When presented with a list of DT nominees proposed for assignment to a DT, the WSC may request the names be kept confidential until the assignment has been made.





The WSC may augment, modify, or replace DT membership at any time. The WSC shall target approval of each DT Roster for no later than 120 days after the SAR start date has been set.

Because the DT chair's primary responsibility is leadership and coordination, the DT chair need not be a SME in the field associated with the SAR.

Names of DT members will be posted on the WECC website.

### **Step 4—Begin Drafting Phase and Submit Draft to WSC**

All DT meetings shall be open and publicly noticed on the WECC website.

The DT will begin working on the documents required by the SAR following assignment by the WSC. Notice of each DT meeting shall be dispatched via the SEL a minimum of 14 days prior to the meeting.

The author of the SAR may participate in the drafting process. The author of the SAR may be asked to provide additional information, supporting studies, and other information to support the requirements of the proposed RRS or CRT.

An RRS shall include those sections mandated by NERC, such as an applicability section, effective date, mandatory requirements, affected time horizons, measures, compliance, violation risk factors (VRF), and violation severity levels (VSL).

Each RRS shall promote at least one reliability principle and be consistent with all reliability principles and NERC market interface principles. Each RRS shall provide for as much uniformity as possible with Reliability Standards across the interconnected Bulk Power System of the North American continent.

An RRS shall either:

1. Be more stringent than a continent-wide reliability standard,
2. Include a regional difference addressing matters that the continent-wide reliability standard does not; or
3. Be a regional difference necessitated by a physical difference in the Bulk Power System.

For an RRS, inclusion of optional explanatory narrative such as a guidance section, illustrations, or a background section will comport with NERC's most current drafting conventions.

For a CRT, an optional explanatory narrative may be included directly in the CRT.

An RRS or CRT may include new definitions of terms that need to be added to the NERC or WECC glossary, respectively. Wherever possible, DTs are encouraged to use existing defined terms rather than create new defined terms.

In drafting the applicability section of an RRS, only functions in the NERC Compliance Registry will be used. In drafting the applicability section of a CRT, functions outside of the NERC Compliance Registry may be used.



To avoid conflict of interest, WECC and its committees and subgroups shall not be listed as the applicable entity in an RRS or CRT.

The DT shall, at a minimum—

- Review any preliminary technical assessment provided with the SAR;
- Perform or request additional technical studies deemed necessary either by the DT or at the direction of the WSC;
- Prepare supporting documents to support the RRS or CRT as needed; and
- Request more time from the WSC to develop the RRS or CRT, if necessary.

Incorporation of extrinsic documents into an RRS or CRT should be avoided.

### Step 5—Post for Comment

On completion of each iterative draft of the RRS or CRT, WECC staff shall facilitate the posting of the draft RRS or CRT on the WECC website, along with supporting documents, if any, for a comment period of no less than 30 days for each posting, except as allowed in the Expedited Process for Urgent Action section of these Procedures.

An implementation plan shall be included in at least one iterative posting during the development of the RRS or CRT and shall be a part of the final record for consideration prior to ballot. (Interpretations do not require an implementation plan.)

A notice that the comment period has opened shall be distributed via the SEL. The notice shall include, at a minimum—

- Identification of the RRS or CRT;
- What action is being taken (e.g., request for comment);
- The location of the document for review;
- How to submit comments or perform the requested action; and
- The opening and closing dates during which the solicited action shall take place. Unless otherwise posted, all posting periods close at 6:00 p.m. MST.

WECC shall open a web portal to serve as the sole means of receiving comments on the RRS or CRT. Comments received via other media or received outside of the posted comment period will be accepted at the discretion of the DT. Comments may be submitted by any individual or entity, or a group of parties with a common comment.

To streamline the process, if a group of parties elects to submit a common comment, those parties are encouraged to submit that common comment only once and append to the comment the names of all individuals, entities, or groups that support the common position. DTs shall give due weight to such a joint comment.



The WSC shall monitor each posting and review the posted documents to ensure that the RRS or CRT:

1. Remains within the scope of the SAR;
2. Continues to be appropriate for development; and
3. Meets any regulatory or policy-related directive, including adherence to these Procedures.

On a finding by a majority of the WSC members that the RRS or CRT does not meet one or more of the above three criteria, the WSC may —

1. Adjust the scope of the SAR;
2. Remand the work product to the DT with specific remedial direction;
3. Exercise its right to augment, modify, or replace any or all DT members; or
4. Exercise any combination of the above.

The WSC's rights and obligations specified in Step 5 terminate once a Ballot Pool is opened. The WSC retains the right to recommend that the Board not approve a specific RRS or CRT even though the project may subsequently be approved by the Ballot Pool.

### **Step 6—Respond to Comments**

The DT shall consider all comments submitted in accordance with these Procedures. If the same comment is provided more than once in a single posting, the DT may provide a single response to all comments that raise the same or a similar concern. If the same comment is received in iterative postings, the DT is not obligated to respond to comments previously addressed.

The DT shall prepare a response to comments received that includes reporting the changes made to the proposed RRS or CRT resulting from comments received, if any. The DT shall also report on comments that were rejected by the DT, in whole or in part, and the reason(s) the comments were rejected. The response to comments will be posted on the WECC website no later than the next posting of the proposed RRS or CRT.

The DT should target posting its responses to the WECC website no later than 30 days after the comment window has closed. If more than 30 days are required, the DT chair or WECC staff should advise the WSC chair of the DT's progress and request additional assistance if needed.

All parties submitting comments are encouraged to participate in the DT meetings during which responses to their comments are considered and drafted.

### **Treatment of Substantive Changes**

All Substantive Changes to an RRS or CRT require at least one posting/comment/response cycle.

If the DT determines that comments received during any posting warrant a Substantive Change to the language of an RRS or CRT, the DT shall consider each comment and redraft the RRS or CRT



accordingly, repeating the posting/comment/response cycle as many times as needed to address Substantive Changes while staying within the scope of the SAR.

If at any time during the development process, the DT determines that the scope of the SAR should be adjusted, the DT shall present that request to the WSC for disposition.

If at any time during the development process, the DT determines that it has reached a developmental impasse, the DT shall present the issue to the WSC for disposition.

If comments received during any posting do not warrant a Substantive Change to the language of an RRS or CRT, the DT present at a regularly scheduled and announced DT meeting shall be asked whether the RRS or CRT should be forwarded to the WSC with a recommendation to ballot the document. If the DT affirms by a majority poll of those present that the RRS or CRT should be forwarded to the WSC with a recommendation for ballot, the document will be forwarded accordingly.

### Treatment of Non-Substantive Changes

Non-Substantive Changes do not require a posting/comment/response cycle.

Non-Substantive errors discovered prior to the opening of a WECC ballot on either an RRS or a CRT may be corrected by WECC staff.

### *Regional Reliability Standards*

If a Non-Substantive Change to an RRS is required at any time after a WECC ballot window opens, the proposed change shall be presented to the WSC with a request for approval. If the WSC agrees that the correction of the error does not change the scope or intent of the associated RRS, 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.

### *WECC Regional Criteria*

If a Non-Substantive Change to a CRT is required at any time after a WECC ballot window opens, the proposed change shall be presented to the WSC with a request for approval. If the WSC agrees that the correction of the error does not change the scope or intent of the associated CRT, and agrees that the correction has no material impact on the applicable entities, the WSC shall approve the change. No further action is required.

Implementing updated document styles, templates, or standardized language approved by WECC for CRTs or NERC for RRS is explicitly within the purview of staff and does not require further approval.



### Step 7—Submit Proposed Draft to the WSC with a Request for Ballot

On completion, the DT shall present the proposed RRS or CRT to the WSC during a duly noticed WSC meeting with a request for balloting by a WECC Ballot Pool. The WSC shall address that request no later than its next duly noticed meeting.

After receiving a request for ballot, the WSC shall review the final draft of the RRS or CRT as presented and determine whether it fulfills the requirements stated in the SAR. The WSC shall also consider whether the content of the document meets extrinsic requirements such as FERC orders, Board directives, or other regulatory directives.

If the WSC concludes that the proposed RRS or CRT is ready for ballot, the WSC shall forward the draft document to WECC staff with a request that a Ballot Pool be formed from the Ballot Body, for the specific intent of seeking approval of the document(s).

The results of the WSC's vote to forward the RRS or CRT to the Ballot Pool shall be documented. Any WSC member that opposes submittal of the RRS or CRT will be encouraged to provide dissenting comments and, if possible, specific language that would make the document acceptable to the dissenting member. If the WSC cannot reach agreement to submit the draft document to the Ballot Pool, the WSC will report to and seek guidance from the Board.

If the WSC concludes that the proposed RRS or CRT is not ready for ballot because it does not fulfill the requirements of the SAR or because it fails to meet other regulatory requirements or directives, the WSC shall remand the RRS or CRT to the DT with a specific explanation identifying the deficiencies that must be remedied.

Upon receiving the remanded RRS or CRT and explanation of deficiencies, the DT shall:

1. Redraft the RRS or CRT accordingly;
2. Initiate iterative comment/response cycles as needed until it again concludes that no further Substantive Changes are needed; and
3. Return the proposed RRS or CRT to the WSC for disposition.

### Step 8—Convene a Standards Briefing

Once the WSC approves submitting the RRS or CRT to the Ballot Pool, WECC shall dispatch notice to the SEL that a Standards Briefing will be held to discuss the content of the proposed RRS or CRT prior to balloting. Notice shall be provided seven days or more before the Standards Briefing is to be held and shall provide, at a minimum:

- Identification of the RRS or CRT;
- The time and place of the Standards Briefing; and
- The WECC website location of the proposed RRS or CRT and related documentation for review.



### Step 9—Form the Ballot Pool and Ballot the Standard

Any individual or entity seeking participation in the Ballot Pool of an RRS or CRT shall first apply to WECC for Ballot Body membership in any SVS in which it is eligible. WECC staff shall review the request and confirm eligibility to join the Ballot Body. Prior to confirmation of eligibility, the application is considered pending. While an application is pending, the applicant cannot join a Ballot Pool. Applications received less than five days prior to the opening of a Ballot Pool may not be considered for inclusion in that Ballot Pool unless specifically allowed by the Director of Standards(DOS).<sup>6</sup> Decisions of staff to deny the admission of an individual or entity to an SVS may be appealed to the WSC.

WECC staff shall require Ballot Body members to identify their Affiliates (as defined in the WECC Bylaws) who are also Ballot Body members. Affiliates within a single SVS may only have one vote in that SVS. Affiliates within a single SVS must designate a single Affiliate as the group's Ballot Pool member to vote in that SVS.

From the Ballot Body, a discrete Ballot Pool will be formed for each RRS or CRT to be balloted under these Procedures. All members of the Ballot Body shall be given an opportunity to opt into a Ballot Pool formed for voting on each RRS or CRT. Once a Ballot Pool is established, an entity shall not be allowed to change the SVS(s) in which it has registered until balloting of the associated project has concluded. It is the Ballot Pool that votes on RRSs and CRTs developed under these Procedures.

Notice that a Ballot Pool is forming will be sent via the SEL and posted to the WECC website. That notice shall contain, at a minimum, the following information:

1. Identification of the RRS or CRT;
2. The proposed action to be taken (e.g., Notice of Ballot Pool Formation / Notice of Ballot);
3. When the Ballot Pool will open and close;
4. When the ballot will take place;
5. How to cast a vote; and,
6. The WECC website location of the proposed RRS or CRT and related documents for review.

Unless explicitly allowed per the Expedited Process for Urgent Action, the Ballot Pool registration window shall remain open for a period determined by WECC staff, but in no case shall the Ballot Pool registration window be open less than 14 days or more than 45 days.

Once notice of a Ballot Pool forming has been dispatched, the ballot window shall commence no sooner than 14 days and no later than 45 days after that dispatch.

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<sup>6</sup> Providing the DOS with discretion to override allows for reasonable accommodations in the event of unforeseen circumstances.



Once the ballot window opens, no Ballot Body member may join or withdraw from the Ballot Pool. The DOS has sole discretion to authorize deviations from this rule. Voting on an RRS or CRT shall be via electronic voting administered on the WECC website. The default voting window shall be a period of 14 days; however, the window may remain open to a maximum of 45 days to reach a quorum. Additional Standards Briefings may be held as needed.

### Treatment of Abstentions and Explanatory Narrative during Ballot

Each ballot requires a two-thirds quorum to proceed and a two-thirds Affirmative Fractional Majority Vote (AFMV) to approve an RRS or CRT.

Abstentions and negative votes cast without an explanatory narrative are *included* for quorum and *excluded* from AFMV. To be included in the AFMV, a negative vote must be accompanied by an explanatory narrative describing why the negative vote was cast.

The explanatory narrative will then be provided to the DT.

If the DT determines the explanatory narrative raises a new reliability issue that should be addressed in the project, the DT will communicate that finding to the WSC and the project progression shall return to Step 5 for resolution.<sup>7</sup>

If the DT or the WSC determines the explanatory narrative indicates potential approval of the project “but for” a minor change or clarification, the WSC may remand the project to the DT with a request to make remedial changes followed by an immediate ballot beginning at Step 7.

### Quorum Calculation

To determine whether a quorum has been met, sum:

- The affirmative votes;
- The negative votes; and
- The abstentions.

Then, divide the sum by the total number in the Ballot Pool. If the quotient is two-thirds or greater, the quorum has been met.

### Ballot Calculation

Eligible members of the Ballot Pool may cast one vote in each SVS for which they are eligible.

The total number of votes cast is the sum of the affirmative votes plus the negative votes with an explanatory narrative.

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<sup>7</sup> This does not apply to procedural issues. Procedural issues raised for the first time during the balloting phase are addressed in the Procedures at Step 10 – Initiate the Appeal Process – If Needed.



Voting among the SVSs shall be weighted as follows:

*For an SVS in which 10 or more votes are cast, determine the AFMV by dividing that SVS's affirmative votes by the number of all votes cast in that SVS. Calculate to the third decimal place and round to the nearest whole number. The result is the AFMV.*

For example, where 29 votes were cast in a single SVS:

- 18 "yes" votes
- 11 "no" votes
- 29 votes cast
- The AFMV =  $18/29$  or .620. The quotient is rounded down to 62%.

*For an SVS in which nine or fewer votes are cast, determine the AFMV by first dividing the affirmative votes by the number of all votes cast in that SVS. Calculate to the third decimal place and round to the nearest whole number. Multiply that quotient by 10%.<sup>8</sup> Then, multiply the result by the number of voters in that SVS.*

For example, where seven votes were cast in a single SVS:

- Six "yes" votes
- One "no" vote
- Seven votes cast
- The AFMV =  $((6/7) \times .10) \times 7 = 60\%$ . The quotient required no rounding.
- Add the AFMVs for all SVSs. Divide that sum by the number of SVSs in which a vote was cast.<sup>9</sup> If the sum of the AFMV for all SVSs divided by the number of voting SVSs is at least two-thirds, the RRS or CRT has been approved.

After a valid vote by the Ballot Pool, the WSC shall take one of the following actions:

- If the Ballot Pool approves the project, forward the project to the Board with a request for disposition. (The WSC is not required to endorse the project and may submit a recommendation for disposition that is contrary to the finding of the Ballot Pool.)
- If the Ballot Pool rejects the project but provides an explanatory narrative meeting the above criteria, remand the project to the DT for remedial action. (See above.)

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<sup>8</sup> SVSs with less than 10 votes (affirmative or negative) are discounted such that each vote counts 0.1 of the segment weight.

<sup>9</sup> An SVS shall be considered as "voting" if any member of the SVS in the Ballot Pool casts either an affirmative vote, or a negative vote with a required narrative.





- If the Ballot Pool rejects the project without explanatory narrative meeting the above criteria, the project will be deemed complete with no further action taken, except as allowed in the Regulatory Directive section of these Procedures.

### **Step 10—Initiate the Appeals Process—If Needed**

Any person may appeal the alleged non-adherence to any provision of these Procedures. The request for appeal, along with an explanation of the alleged grounds for appeal, must be submitted to the DOS no later than 10 days after the alleged grounds for appeal arise. If the tenth day is not a WECC business day, the appeal must be submitted no later than the next WECC business day.

The DOS will attempt resolution with the appellant. If resolution cannot be reached, the DOS will forward the appeal to the WSC for disposition. The WSC's decision may be appealed to the Board. The Board's decision may not be appealed.

### **Step 11—Obtain Board Approval**

The WSC shall provide the Board with the RRS or CRT, associated supporting documents as needed, the final ballot results, and a summary of the rationale supporting any negative votes cast. The documents will be posted for Board review per the WECC Bylaws. The Board shall consider the RRS or CRT for approval no later than its next regularly scheduled meeting after presentation by the WSC with a request for approval.

Any person or entity may submit comments to the Board for the Board's consideration. The Board shall consider the full development record when making its decision.

If a CRT is approved by the Board, WECC shall post the final CRT on its website and the SAR will be deemed complete. The effective date will be as approved by the Board.

If an RRS is approved by the Board, WECC shall forward the RRS to NERC with a request for approval and subsequent regulatory disposition, as needed.

If the RRS or CRT is rejected by the Board, the Board may either deem the SAR complete or remand the RRS or CRT to the WSC with specific guidance as to proposed changes.

If the RRS or CRT is remanded, any Substantive Changes shall be vetted in accordance with these Procedures. Under no circumstances shall the Board make Substantive Changes to the RRS or CRT, except in accordance with the terms on Regulatory Directives set forth herein.

### **Step 12—Submit for NERC and FERC Approval and Implementation**

Note: Step 12 only applies to RRSs.



### Step 13—Retire a CRT

Upon the recommendation of a DT, the WSC may retire all or a part of a CRT with no further due process on a finding that each of the following criteria has been met:

1. The substance of the document is addressed in a NERC Reliability Standard, other WECC Criteria, or another regulatory document; and
2. Retirement of the CRT will not cause a reliability gap.

Proposed retirement of a CRT under this section shall be noticed on the WSC agenda and vetted during at least one WSC meeting.

### Step 14—Submit a Request for Interpretation

A valid Request for Interpretation (RI) is one that requests additional clarity about one or more requirements in approved RRSs or CRTs but does not request approval as to how to comply with one or more requirements. A valid RI response provides additional clarity about one or more requirements but does not expand on any requirement and does not explain how to comply with any requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk Power System may request an interpretation of any requirement in any RRS or CRT that has been adopted by the NERC Board of Trustees or the WECC Board, respectively. Interpretations will only be provided for currently effective documents or those that are approved and have a future effective date.

An RI may only seek to clarify or interpret the requirements of the affected document, including, if applicable, any attachment referenced in the requirement being clarified. No other elements of the affected document are subject to interpretation.

The entity requesting the interpretation shall submit a SAR, or its successor form, as provided on the WECC website. The RI shall explain the clarification required, the specific circumstances surrounding the request, and the impact of not having the interpretation provided. The WECC Standards Department shall review the RI to determine whether it meets the requirements for a valid interpretation. Based on this review, the WECC Standards Department shall make a recommendation to the WSC whether to accept the RI for development.

For example, an RI may be rejected where it—

1. Requests approval of a specific compliance approach;
2. Identifies a gap or perceived weakness in the approved RRS or CRT;
3. Can be addressed by an active standard drafting team;
4. Requests clarification of any element of an RRS or CRT other than a Requirement;
5. Asks a question that has already been addressed in the record;
6. Identifies an issue and proposes the development of a new or modified RRS or CRT, (such issues should be addressed via submission of a SAR);



7. Seeks to expand the scope of an RRS or CRT; or
8. The meaning of an RRS or CRT is plain on its face.

If the WSC rejects the RI, it shall provide a written explanation for rejecting the interpretation to the requesting entity within 10 days of the decision to reject. If the WSC accepts the RI, the WSC shall convene an interpretation drafting team (IDT) to address the request. Where possible, members of the original DT should constitute the IDT.

Development of the interpretation shall follow the same steps as those for developing an RRS or CRT, with the following exceptions:

- The chair of the WSC shall either assign members of the original DT or solicit nominees for an IDT for approval by the WSC, or both. The IDT shall be composed of SMEs with relevant expertise to address the clarification and, to the extent practical, should include members of the original DT. The IDT shall not include any person representing the entity that filed the RI; however, this prohibition does not preclude representatives of the filing entity from participating in the development process.
- Once an interpretation has been approved by the Board, the interpretation shall be appended to the interpreted document. For an RRS, the interpretation shall be submitted to NERC for NERC and FERC approval.
- The interpretation will remain appended to the interpreted document until the document is revised and the interpretation's content can be addressed during the revision process. RRS interpretations shall not be effective in the United States until approved by FERC and shall not be effective in other jurisdictions until approval by the applicable governmental authority.
- If, during its deliberations, the IDT identifies a reliability gap in the affected document, the IDT shall notify the WSC of its conclusion and may submit a SAR with the proposed modification to the affected document at the same time it provides its proposed interpretation.

## Supporting Processes

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### Expedited Process for Urgent Action

In cases requiring urgent action, such as in the development of emergency procedures, any person or entity may propose an interim RRS or CRT for approval by the WECC Board. The RRS or CRT may go through a process that eliminates any or all of the steps outlined previously, but only to the extent deemed necessary by the Board and only in a manner that is consistent with the WECC Bylaws.

If the Board approves the interim document, it shall establish an initial effective date for the interim document.

Within 90 days after the initial effective date of the document, the Board shall either:



1. Cause a SAR to be submitted requesting the development under these Procedures of a permanent replacement to the interim document; or
2. Shall extend the applicability of the interim document for an additional 90 days.

The extension can be renewed more than once, but a good-faith effort must be made to develop a permanent replacement under these Procedures.

If a SAR is submitted, the interim RRS or CRT shall remain in effect until the permanent replacement RRS or CRT becomes effective.

If a SAR is not submitted and the interim RRS or CRT has not been extended, the interim RRS or CRT shall be deemed retired.

### Regulatory Directives

These Procedures acknowledge that FERC may order WECC to make specified regulatory changes to documents created under these Procedures. For this section only, those documents are referred to as Directive Regional Reliability Standards (DRRS).

If the Board determines that these Procedures failed to result in a DRRS meeting the mandated regulatory changes, the Board shall have authority to take the following actions to ensure that the DRRS is responsive to the regulatory directive.

1. If the Ballot Pool approves a DRRS that does not address a regulatory directive required to be included in that document, the Board may remand the DRRS to the original DT or instruct the WSC to convene a new or augmented DT to redraft the document. The Board shall instruct the DT on the specific regulatory directive that must be contained in the redraft. Once the DRRS is redrafted, it shall be reprocessed under these Procedures.
2. If the Ballot Pool rejects a DRRS or fails to ballot the DRRS due to failure to reach a quorum, either when first presented for ballot or during an iterative redraft as instructed by the Board, the Board shall review the DRRS, including all comments provided and all rationale accompanying any negative vote.
  - Upon a finding that the DRRS was rejected for reasons not related to the regulatory directive, the Board may direct WECC staff to file a new SAR with the specific narrow scope of addressing only the regulatory directive. The Board may suggest specific language for inclusion in the proposed DRRS.
  - Upon a finding that the DRRS was rejected based on language addressing the regulatory directive, the Board shall take the following steps to meet its regulatory obligation:
    1. Review the entire record of development.

2. Require a public technical conference to be noticed and convened to determine whether the rejected DRRS is—
  - just and reasonable;
  - not unduly discriminatory or preferential;
  - in the public interest;
  - helpful to reliability;
  - practical;
  - technically sound;
  - technically feasible;
  - cost-justified; and,
  - meeting the regulatory directive.
3. Determine whether the DRRS should be implemented as drafted, notwithstanding rejection by the Ballot Pool.
  - Upon a finding that the rejected DRRS should be implemented, the Board shall approve the DRRS and direct that it be submitted for NERC and FERC approval, as required.
  - Upon a finding that the rejected DRRS should not be implemented, the Board may submit the DRRS and its record of development as a regulatory compliance filing in response to the regulatory directive. The filing shall include a recommendation that the DRRS not be made effective and an explanation of the basis for that recommendation.

### **Maintenance of the Procedures**

The WSC is charged with maintenance of these Procedures. Proposed changes to these Procedures shall first be brought to the WSC for consideration. The WSC may initiate proposed changes on its own initiative.

If the WSC determines that a change to these Procedures should be pursued, the WSC shall draft the proposed changes and post the proposed changes to the WECC website for comment, accompanied by a notice to the SEL soliciting comments on the proposed changes.

The WSC shall consider all comments received and shall redraft the proposed changes as it deems necessary. Once the WSC approves the proposed changes, those changes shall be submitted to the Board for approval, subject to the WSC's continuing right to withdraw that request until the Board approves that request. Changes to these Procedures approved by the Board shall be submitted to NERC for NERC and FERC approval.

### **Maintenance of RRSs and CRTs**

The WSC shall ensure that each RRS and each CRT undergoes a substantive review at least once every five years. An errata change does not constitute substantive review for purposes of this section.



### Field Tests

WECC will follow a process for field tests, or collection and analysis of data to validate concepts, that is similar to the process identified in the NERC Standards Processes Manual, as may be amended.

Approval for a WECC field test must be obtained from the WSC with consultation from WECC SMEs, as needed. Approval is neither required from NERC nor is there a requirement to consult NERC SMEs.

When a temporary waiver from compliance with an RRS is requested, WECC shall coordinate the test with the appropriate NERC and WECC compliance sections before the test begins. Waiver from adherence with a WECC CRT shall be addressed internally at WECC.



Version History

Version	Date	Action	Change Tracking
<a href="#">Version 1</a>	March 1, 2012	FERC approved; effective date	<ul style="list-style-type: none"> <li>• Aligned WSC Charter and the Procedures</li> <li>• Clarified voting sector eligibility</li> <li>• Updated definitions</li> <li>• Added treatment of substantive and non-substantive changes</li> <li>• Added requirement for tracking numbers, notice details</li> <li>• Streamlined timelines</li> <li>• Created DOS ability to override</li> <li>• Requirement for narrative with a “no” vote</li> <li>• Provides DT more time to respond to comments</li> </ul>
<a href="#">Version 2</a>	December 23, 2014	FERC approved; effective date	<ul style="list-style-type: none"> <li>• “Other Projects” can be developed under the Procedures</li> <li>• Standing Committees replaced the WSC</li> <li>• Voting rights for Participating Stakeholders and interested members of the registered ballot body clarified</li> <li>• The use of “business days” replaced with the generic terms “days”</li> <li>• Negative votes without explanation are not counted towards results but are counted for quorum</li> <li>• Violation Severity Levels added as a mandatory element of the development process</li> <li>• “Joint Session” is deleted in favor of Standards Briefing</li> <li>• Allowance for creation of multiple email exploders</li> <li>• Mandate to use the NERC Functional Model removed for Other Projects</li> <li>• Time windows changed for ballot window, SAR actions, and DT response times</li> <li>• Appellate grounds for due process, expedited process for urgent matters added</li> <li>• Purview expanded/clarified for Director of Standards and WSC</li> <li>• Definitions aligned with WECC Bylaws</li> <li>• Contingency for lack of quorum added</li> </ul>



## Reliability Standards Development Procedures

Version	Date	Action	Change Tracking
<a href="#">Version 3</a>	October 17, 2017	FERC approved; effective date	<ul style="list-style-type: none"> <li>Definitions updated/deleted</li> <li>NERC Rules of Procedure, Appendix 3D, Standard Voting Segments adopted</li> <li>Requirement was added that all new SARs be vetted during a WSC meeting.</li> <li>SAR approval window extended to 90 days</li> <li>DT approval window extended to 120 days</li> <li>DT notice shortened to 14 days</li> <li>WECC disallowed from inclusion in the Applicability section</li> <li>45-day posting period shortened to 30 days</li> <li>Closing hour of posting was extended from 5:00 p.m. to 6:00 p.m. (Mountain).</li> <li>A streamlined approval process for non-substantive changes</li> <li>Application to join a Ballot Body must precede a Ballot Pool by no less than five days.</li> <li>Participating Stakeholders have been deleted.</li> <li>The Director of Standard’s discretion has been broadened regarding late entrance into a Ballot Pool.</li> <li>The entire Step 10 appeals process has been redrafted.</li> <li>14-day notice period has been added as a precursor to retirement of a WECC Criterion when based on a finding of redundancy.</li> <li>Interpretation section redrafted to mirror NERC</li> <li>A new section for Field Tests was added.</li> </ul>
<a href="#">3.1</a>	NA	NA	<ul style="list-style-type: none"> <li>New template</li> </ul> <p><b>Posting 1—Proposed Changes</b></p> <p>The following changes are proposed in Posting 1 of the WECC-0140 Reliability Standards Development Procedures (RSDP) review. Styles and pagination are subject to technical editing.</p> <ul style="list-style-type: none"> <li>Introduction</li> </ul>





## Reliability Standards Development Procedures

Version	Date	Action	Change Tracking
			<ul style="list-style-type: none"> <li>○ Footnote 1 is added to adopt a definition for Regional Entity.</li> <li>• Definitions               <ul style="list-style-type: none"> <li>○ A definition for Affirmative Fraction Majority is proposed.</li> <li>○ The definition for Regional Reliability Standard is modified to include Regional Variances.</li> </ul> </li> <li>• WECC Standards Committee               <ul style="list-style-type: none"> <li>○ Verbiage was updated to match the WSC Charter.</li> </ul> </li> <li>• Step 2 Complete SAR and Present to the WSC               <ul style="list-style-type: none"> <li>○ “the SAR” was added for clarity, paragraph 2.</li> <li>○ Because a SAR can be refiled without prejudice there is no need to preserve appellate rights up to the WECC Board of Directors. Therefore, the last sentence of the section was deleted.</li> </ul> </li> <li>• Step 3 Convene a Drafting Team               <ul style="list-style-type: none"> <li>○ Substance of WSC guideline was adopted.</li> </ul> </li> <li>• Step 4 Begin Drafting Phase and Submit Draft to WSC               <ul style="list-style-type: none"> <li>○ Syntax was changed for clarity.</li> <li>○ A change was added allowing flexibility in WECC CRT structure. This is done to differentiate the structure from that of a standard, particularly as NERC moves to extract guidance narrative from the body of its standards.</li> </ul> </li> <li>• Step 5 Post for Comment               <ul style="list-style-type: none"> <li>○ Syntax was changed for clarity.</li> </ul> </li> <li>• Step 6 Respond to Comments               <ul style="list-style-type: none"> <li>○ At “Treatment of Substantive Changes,” syntax was changed for clarity.</li> <li>○ “Vote” was changed to “poll.”</li> </ul> </li> </ul>



## Reliability Standards Development Procedures

Version	Date	Action	Change Tracking
			<ul style="list-style-type: none"> <li>○ At “Treatment of Non-substantive Changes” staff is empowered to make non-substantive changes without convening a WSC meeting.</li> <li>○ At “WECC Regional Criteria,” staff is empowered to make non-substantive changes without convening a WSC meeting.</li> <li>• Step 7 Submit Proposed Draft to the WSC with a Request for Ballot               <ul style="list-style-type: none"> <li>○ No change,</li> </ul> </li> <li>• Step 8 Convene a Standards Briefing               <ul style="list-style-type: none"> <li>○ The notice period was shortened to 7 days. Historically, Standards Briefings are low profile with no controversy. Expedites administration.</li> </ul> </li> <li>• Step 9 Form the Ballot Pool and Ballot the Standard               <ul style="list-style-type: none"> <li>○ Additional decision-making authority is provided to DOS and the WSC. The WSC is proficient to read a description and make the call without convening a Board meeting.</li> <li>○ Clarification is added.</li> <li>○ The notice period is shortened to 45 days as opposed to 60 to expedite administration.</li> <li>○ The phrase “good cause” is deleted because it is ambiguous.</li> <li>○ A new section “Treatment of Abstentions and Explanatory Narrative during Ballot” was added to incorporate the WSC guideline.</li> <li>○ A large portion of this section was redrafted for clarity.</li> </ul> </li> <li>• Step 10 Initiate the Appeals Process – If Needed               <ul style="list-style-type: none"> <li>○ WSC is permitted to approve a project immediately before</li> </ul> </li> </ul>



## Reliability Standards Development Procedures

Version	Date	Action	Change Tracking
			<p>providing it to the Board for approval.</p> <ul style="list-style-type: none"> <li>• Step 11 Obtain Board Approval               <ul style="list-style-type: none"> <li>○ Remand is directed to the WSC as opposed to the drafting team. The WSC can then decide the next steps.</li> </ul> </li> <li>• Step 12 Submit for NERC and FERC Approval and Implementation               <ul style="list-style-type: none"> <li>○ This section can be deleted as superfluous to the WECC Delegation Agreement. It can be replaced by a simple sentence to that effect. If adopted, "Steps" will have to be renumbered.</li> </ul> </li> <li>• Step 13 Retire a CRT               <ul style="list-style-type: none"> <li>○ Since the WSC is a procedural oversight body and not SMEs on reliability, review by a DT is preferred.</li> <li>○ The 14-day notice requirement can be eliminated if the above language is adopted. Notice will be provided via the DT announcements.</li> </ul> </li> <li>• Step 14 Submit a Request for Interpretation               <ul style="list-style-type: none"> <li>○ Capitalization of Request for Interpretation</li> <li>○ Syntax changes were made for clarity.</li> </ul> </li> <li>• Supporting Processes               <ul style="list-style-type: none"> <li>○ No change.</li> </ul> </li> <li>• Maintenance of RRSs and CRTs               <ul style="list-style-type: none"> <li>○ Language was added for clarification.</li> <li>○ The "how to" clause was removed.</li> </ul> </li> </ul>

