

**Name (2 Responses)**  
**Organization (2 Responses)**  
**Group Name (3 Responses)**  
**Lead Contact (3 Responses)**  
**Contact Organization (3 Responses)**  
**Question 1 (5 Responses)**  
**Question 1 Comments (5 Responses)**  
**Question 2 (5 Responses)**  
**Question 2 Comments (5 Responses)**  
**Question 3 (5 Responses)**  
**Question 3 Comments (5 Responses)**  
**Question 4 (5 Responses)**  
**Question 4 Comments (5 Responses)**  
**Question 5 (5 Responses)**  
**Question 5 Comments (5 Responses)**

Individual
Mike Burlison
Arizona Public Service
Yes
No
No
No
Yes
Group
pacificorp
ryan millard
pacificorp
Yes
No
No
No
Yes
Individual
Janelle Marriott-Gill
Tri-State Generation and Transmission Assn., Inc.
Yes
No
No

No
Tri-State has been a strong advocate for bringing WECC's curtailment practices in line with the curtailment priorities of FERC's pro forma OATT. As explained in its complaint at FERC in Docket Nos. EL13-11-000 and RD13-1-000, WECC's current curtailment practices are not consistent with the curtailment priorities of FERC's pro forma OATT. While Tri-State does not object to the substance of the requirements of this standard, which Tri-State views are largely clarifying, Tri-State does object to the Effective Date provision to the extent it authorizes WECC staff to delay implementation of a resolution of the inconsistency until "complete implementation of applicable webSAS changes and FERC approval of this standard and the revised Unscheduled Flow Mitigation Plan Documents." As drafted in IRO-006-WECC-2, the requirements are indifferent to the methodology or tools to be used to mitigate unscheduled flow. Upon FERC approval, this standard has no bearing or impact to either the current or future WECC relief methodologies. Tacking on language to hold the effective date of IRO-006-WECC-2 until software is developed, and until the separate FERC docket approval process is complete for "plan" documents is not derived from the language in the standard, is not necessary, provides a loophole for the potential delay of implementation of IRO-006-WECC-2, and thus potential delay of resolution of FERC pro forma OATT priorities indefinitely. Accordingly, Tri-State believes the Effective Date provision in the revised standard would "pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability." Tri-State proposes the following Effective Date language: "On the latter of the first day of the first quarter at least 45 days after Regulatory approval." Thank you.
Yes
Group
Bonneville Power Administration
Chris Higgins
Transmission Reliability Program
Yes
No
No
No
Yes
Group
Arizona Public Service Company
Janet Smith, Regulatory Affairs Supervisor
Arizona Public Service Company
Yes
No
No
No
Yes