**Unofficial Comment Form**WECC Regional Variance – IRO-002-5

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on Regional Reliability Standard **IRO-002-5 – Reliability Coordination – Monitoring and Analysis (WECC Variance)**. Comments must be submitted by **8 p.m. Eastern, Monday, April 22, 2019.**

The [Regional Reliability Standards Under Development](http://www.nerc.com/pa/Stand/Pages/RegionalReliabilityStandardsUnderDevelopment.aspx)page contains documents and information about this project. If you have questions, contact [Nasheema Santos](mailto:nasheema.santos@nerc.net) (via email).

**Background Information**

As the Western Interconnection moves to a multi-Reliability Coordinator (RC) environment, focused coordination of those RCs will become critical. WECC developed a proposed Regional Variance to NERC Reliability Standard IRO-002-5, Reliability Coordination—Monitoring and Analysis to ensure coordination between each of those RCs.

The proposed Variance does not change any of the continent-wide Requirements. The WECC Board of Directors adopted the proposed Variance on March 6, 2019.

Prior to NERC Board adoption, the Variance will be inserted into proposed Reliability Standard IRO-002-6, which is currently being balloted as part of the ongoing Project 2018-03 Standards Efficiency Retirements project.

The standard was posted twice for comment, most recently from November 19, 2018 – January 2, 2019 and the comments received can be viewed [here](https://www.wecc.org/Standards/Pages/Default.aspx).

Any variance from a NERC Reliability Standard Requirement that is proposed to apply to responsible entities within a Regional Entity organized on an Interconnection-wide basis shall be considered an Interconnection-wide Variance and shall be developed through that Regional Entity’s NERC-approved regional Reliability Standards development procedure. While an Interconnection-wide Variance may be developed through the associated Regional Entity standards development process, Regional Entities are encouraged to work collaboratively with existing continent-wide drafting team to reduce potential conflicts between the two efforts. An Interconnection-wide Variance from a NERC Reliability Standard that is determined by NERC to be just, reasonable, and not unduly discriminatory or preferential, and in the public interest, and consistent with other applicable standards of governmental authorities shall be made part of the associated NERC Reliability Standard. NERC shall rebuttably presume that an Interconnection-wide Variance from a NERC Reliability Standard that is developed, in accordance with a standards development procedure approved by NERC, by a Regional Entity organized on an Interconnection-wide basis, is just, reasonable, and not unduly discriminatory or preferential, and in the public interest.

NERC is publicly noticing and requesting comment on the proposed WECC Variance. Comments shall be permitted only on the following criteria (technical aspects of the Variance are vetted through the regional standards development process):

**Unfair or Closed Process –** The Variance was not developed in a fair and open process that provided an opportunity for all interested parties to participate. Although a NERC-approved regional reliability standards development procedure shall be presumed to be fair and open, objections could be raised regarding the implementation of the procedure.

**Adverse Reliability or Commercial Impact on Other Interconnections –** The Variance would have a significant adverse impact on reliability or commerce in other interconnections.

**Deficient Standard –** The Variance fails to provide a level of reliability of the bulk power system such that the Variance would be likely to cause a serious and substantial threat to public health, safety, welfare, or national security.

**Adverse Impact on Competitive Markets within the Interconnection –** The Variance would create a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability.

**Questions**

1. **Do you agree the proposed Variance was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?**

Yes

No

Comments:

1. **Does the proposed Variance pose an adverse impact to reliability or commerce in a neighboring region or interconnection?**

Yes

No

Comments:

1. **Does the proposed Variance pose a serious and substantial threat to public health, safety, welfare, or national security?**

Yes

No

Comments:

1. **Does the proposed Variance pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?**

Yes

No

Comments:

1. **Does the proposed Variance meet at least one of the following criteria?**

* **The proposed variance has more specific criteria for the same requirements covered in a continent-wide standard.**
* **The proposed variance has requirements that are not included in the corresponding continent-wide reliability standard.**
* **The proposed regional difference is necessitated by a physical difference in the bulk power system.**

Yes

No

Comments: