

Consideration of Comments

Regional Reliability Standard IRO-006-WECC-2

The Regional Reliability Standard IRO-006-WECC-2 Drafting Team thanks all commenters who submitted comments on the Regional Reliability Standard IRO-006-WECC-2 standard. This standard was posted for a 45-day public comment period from October 3 through November 16, 2012. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were five sets of comments, including comments from approximately eight different people from approximately four companies representing four of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or via e-mail at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Index to Questions, Comments, and Responses

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter											
						3	4	5	6	7	8	9	10
1.	Group	Chris Higgins	Bonneville Power Administration	X		X		X	X				
Additional Member		Additional Organization	Region	Segment Selection									
1.	Joel Jenck	Power Scheduling Realtime	WECC	3									
2.	Robin Chung	Real-Time Scheduling	WECC	1									
3.	Wesley Hutchison	Trans Commercial System Mgmt	WECC	1									
2.	Individual	Ryan Millard	Pacificorp	X		X		X	X				
3.	Individual	Janet Smith, Regulatory Affairs Supervisor	Arizona Public Service Company	X		X		X	X				
4.	Individual	Mike Burluson	Arizona Public Service	X		X		X					
5.	Individual	Janelle Marriott-Gill	Tri-State Generation and Transmission Assn., Inc.	X		X		X	X				

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

Summary Consideration: The drafting team would like to thank each entity that participated in the development process.

Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	Yes	
Pacificorp	Yes	
Arizona Public Service Company	Yes	
Arizona Public Service	Yes	
Tri-State Generation and Transmission Assn., Inc.	Yes	

2. Does the proposed standard pose an adverse impact to reliability or commerce in a neighboring region or interconnection?

Summary Consideration: The drafting team would like to thank each entity that participated in the development process.

Organization	Yes or No	Question 2 Comment
Bonneville Power Administration	No	
PacifiCorp	No	
Arizona Public Service Company	No	
Arizona Public Service	No	
Tri-State Generation and Transmission Assn., Inc.	No	

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

Summary Consideration: The drafting team would like to thank each entity that participated in the development process.

Organization	Yes or No	Question 3 Comment
Bonneville Power Administration	No	
PacifiCorp	No	
Arizona Public Service Company	No	
Arizona Public Service	No	
Tri-State Generation and Transmission Assn., Inc.	No	

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

Summary Consideration:

The drafting team would like to thank each entity that participated in the development process. The drafting team considered the alternatives of keeping the proposed Effective Date or changing it as requested. The drafting team concluded that the net effect is the same under either approach and has opted not to make the requested changes.

Organization	Yes or No	Question 4 Comment
Bonneville Power Administration	No	
Pacificorp	No	
Arizona Public Service Company	No	
Arizona Public Service	No	
Tri-State Generation and Transmission Assn., Inc.	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

Organization	Yes or No	Question 4 Comment
		<p>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.</p>
<p>Response: The drafting team has examined both alternatives finding no net effect in either keeping the language as suggested or making the requested change. Implementing the standard without the underlying Guideline and software changes will not facilitate the Commenter’s desired changes to the curtailment methodology.</p>		

5. Does the proposed regional reliability standard meet at least one of the following criteria?

- **The proposed standard has more specific criteria for the same requirements covered in a continent-wide standard**
- **The proposed standard 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**

Summary Consideration: The drafting team would like to thank each entity that participated in the development process.

Organization	Yes or No	Question 5 Comment
Bonneville Power Administration	Yes	
PacifiCorp	Yes	
Arizona Public Service Company	Yes	
Arizona Public Service	Yes	
Tri-State Generation and Transmission Assn., Inc.	Yes	

END OF REPORT