## **Comment Report**

Project Name: Regional Reliability Standard | PRC-006-5 WECC Variance

Comment Period Start Date: 5/21/2020 Comment Period End Date: 7/6/2020

**Associated Ballots:** 

There were 11 sets of responses, including comments from approximately 15 different people from approximately 12 companies representing 5 of the Industry Segments as shown in the table on the following pages.

## Questions

- 1. Do you agree the proposed Variance was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?
- 2. Does the proposed Variance pose an adverse impact to reliability or commerce in a neighboring region or interconnection?
- 3. Does the proposed Variance pose a serious and substantial threat to public health, safety, welfare, or national security?
- 4. Does the proposed Variance pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?
- 5. 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.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Public Utility District No. 1 of Chelan County	Ginette 1,3,5,6 Lacasse	1,3,5,6	WECC	PUD #1 Chelan	Meaghan Connell	Public Utility District No. 1 of Chelan County	5	WECC
					Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC
					Davis Jelusich Public Utility District No. 1 of Chelan County	6	WECC	
					Ginette Lacasse	public Utility Distric No 1 of Chelan	1	WECC

1. Do you agree the proposed Variance Development Procedure?	was developed in a fair and open process, using the associated Regional Reliability Standards
Jennie Wike - Tacoma Public Utilities (1	acoma, WA) - 1,3,4,5,6 - WECC
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power	Company - 1
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rahn Petersen - PNM Resources - Texa	s-New Mexico Power Co NA - Not Applicable - WECC
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bruce Reimer - Manitoba Hydro - 1,3,5,6	6
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclar	mation - 1,5
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Co	rporation - 1,3,5,6 - MRO,WECC
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Matthew Nutsch - Seattle City Light - 1,3	,4,5,6 - WECC
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Sam Rugel - Unisource - Tucson Electric	Power Co 1
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sandra Shaffer - Berkshire Hathaway - P	acifiCorp - 6
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Puk	plic Service Co 1,3,5,6
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
	No. 1 of Chelan County - 1,3,5,6, Group Name PUD #1 Chelan
Answer	Yes
Document Name	

Comment	
Likes 0	
Likes 0 Dislikes 0 Response	
Response	

2. Does the proposed Variance pose an	adverse impact to reliability or commerce in a neighboring region or interconnection?
Ginette Lacasse - Public Utility District	No. 1 of Chelan County - 1,3,5,6, Group Name PUD #1 Chelan
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Pul	blic Service Co 1,3,5,6
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sandra Shaffer - Berkshire Hathaway - P	PacifiCorp - 6
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sam Rugel - Unisource - Tucson Electric	
Answer	No
Document Name	

Comment		
Likes 0		
Dislikes 0		
Response		
Matthew Nutsch - Seattle City Light - 1,3,	4,5,6 - WECC	
Answer	No	
Document Name		
Comment		
Likes 0		
Dislikes 0		
Response		
Maryanne Darling-Reich - Black Hills Co	rporation - 1,3,5,6 - MRO,WECC	
Answer	No	
Document Name		
Comment		
Likes 0		
Dislikes 0		
Response		
Richard Jackson - U.S. Bureau of Reclan	nation - 1,5	
Answer	No	
Document Name		
Comment		
Likes 0		
Dislikes 0		

Bruce Reimer - Manitoba Hydro - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rahn Petersen - PNM Resources - Texas	-New Mexico Power Co NA - Not Applicable - WECC
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power	Company - 1
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Ta	acoma, WA) - 1,3,4,5,6 - WECC
Answer	No
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	

3. Does the proposed Variance pose a se	erious and substantial threat to public health, safety, welfare, or national security?
Jennie Wike - Tacoma Public Utilities (Ta	acoma, WA) - 1,3,4,5,6 - WECC
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power	Company - 1
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
	s-New Mexico Power Co NA - Not Applicable - WECC
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bruce Reimer - Manitoba Hydro - 1,3,5,6	
Answer	No
Document Name	

Comment		
Likes 0		
Dislikes 0		
Response		
Richard Jackson - U.S. Bureau of Reclan	nation - 1,5	
Answer	No	
Document Name		
Comment		
Likes 0		
Dislikes 0		
Response		
Maryanne Darling-Reich - Black Hills Co	rporation - 1,3,5,6 - MRO,WECC	
Answer	No	
Document Name		
Comment		
Likes 0		
Dislikes 0		
Response		
Matthew Nutsch - Seattle City Light - 1,3,	4,5,6 - WECC	
Answer	No	
Document Name		
Comment		
Likes 0		
Dislikes 0		
Response		

Sam Rugel - Unisource - Tucson Electric	Power Co 1
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sandra Shaffer - Berkshire Hathaway - P	PacifiCorp - 6
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Pul	blic Service Co 1,3,5,6
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ginette Lacasse - Public Utility District	No. 1 of Chelan County - 1,3,5,6, Group Name PUD #1 Chelan
Answer	No
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	

4. Does the proposed Variance pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?	
Ginette Lacasse - Public Utility District	No. 1 of Chelan County - 1,3,5,6, Group Name PUD #1 Chelan
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Public Service Co 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sandra Shaffer - Berkshire Hathaway -	PacifiCorp - 6
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sam Rugel - Unisource - Tucson Electric Power Co 1	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Matthew Nutsch - Seattle City Light - 1,3	,4,5,6 - WECC
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Co	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Bruce Reimer - Manitoba Hydro - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rahn Petersen - PNM Resources - Texas	s-New Mexico Power Co NA - Not Applicable - WECC
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC	
Answer	No
Document Name	

Comment	
Likes 0	
Likes 0 Dislikes 0 Response	
Response	

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Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC  Answer Yes  Document Name  Comment  Likes 0  Dislikes 0  Response  Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer Yes  Cocument Name  Likes 0 Dislikes 0  Response  Laura Nelson - IDACORP - Idaho Power Company - 1	
Comment Likes 0 Dislikes 0 Response  Laura Nelson - IDACORP - Idaho Power Company - 1	
Likes 0 Dislikes 0 Response Laura Nelson - IDACORP - Idaho Power Company - 1	
Likes 0 Dislikes 0 Response Laura Nelson - IDACORP - Idaho Power Company - 1	
Dislikes 0  Response  Laura Nelson - IDACORP - Idaho Power Company - 1	
Dislikes 0  Response  Laura Nelson - IDACORP - Idaho Power Company - 1	
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AIISWCI TES	
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rahn Petersen - PNM Resources - Texas-New Mexico Power Co NA - Not Applicable - WECC	
Answer Yes	
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Bruce Reimer - Manitoba Hydro - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclan	nation - 1,5
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
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Maryanne Darling-Reich - Black Hills Co	rporation - 1,3,5,6 - MRO,WECC
Answer	Yes
Document Name	
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Likes 0	
Dislikes 0	
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Matthew Nutsch - Seattle City Light - 1,3,4,5,6 - WECC	
Answer	Yes
Document Name	
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Likes 0	
Dislikes 0	
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Answer	Yes
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Likes 0	
Dislikes 0	
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Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ginette Lacasse - Public Utility District N	o. 1 of Chelan County - 1,3,5,6, Group Name PUD #1 Chelan
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6	
Answer	
Document Name	
Comment	
PacifiCorp appreciates the opportunity to participate but has no additional comments.	
Likes 0	
Dislikes 0	
Response	