

Consideration of Comments

Western Electricity Coordinating Council (WECC)

The Western Electricity Coordinating Council (WECC) Drafting Team thanks all commenters who submitted comments on the latest version of the Western Electric Coordinating Council (WECC) Reliability Standards Development Procedures. These standards were posted for a 45-day public comment period from April 29, 2014 through June 12, 2014. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There was 1 comment, including comments from approximately 1 person from approximately 1 company representing 1 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 Director of Standards, Valerie Agnew, at 404-446-2566 or at valerie.agnew@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/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

1. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Open” criteria as outlined above? If “No”, please explain in the comment area below. 5

2. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below. 6

3. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below. 7

4. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below..... 9

5. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below.....10

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	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Individual	Jonathan Sykes	PG&E	X										
N/A														

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration:

Organization	Agree	Supporting Comments of "Entity Name"
N/A		

1. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Open” criteria as outlined above? If “No”, please explain in the comment area below.

Summary Consideration:

Organization	Yes or No	Question 1 Comment
N/A		

2. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below.

Summary Consideration:

Organization	Yes or No	Question 2 Comment
N/A		

3. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below.

Summary Consideration:

Organization	Yes or No	Question 3 Comment
PG&E	No	<p>PG&E does not agree with the voting criteria for a balloted RRS or OP to be approved in Step 9 Form the Ballot Pool and Ballot the Standard. We disagree with the values of two-thirds quorum of the Ballot Pool and weighted majority vote of the Ballot Pool (greater than 50%). We believe these are too low. We suggest a 75% quorum of the Ballot Pool and two-thirds (2/3) weighted majority vote among the SVCs for approval, which are the same as used for approval of balloted NERC standards. A two-thirds majority and 75% quorum would assure roughly 50% approval of the registered ballot body for a ballot to pass (if number of votes in each sector was roughly the same). If the lower thresholds are used you could have a ballot approved by a minority of the registered ballot pool.</p>
<p>The Western Electricity Coordinating Council (WECC) thanks Pacific Gas and Electric (PGE) for its comments.</p> <p>WECC notes that the proposed values were carried forward from the existing procedures as previously approved by WECC/NERC and FERC; no changes were made.</p> <p>To PG&E’s point, neither the NERC Rules of Procedure nor the ANSI processes require a specific quorum; rather, those rules require that balanced consensus be met. WECC believes the proposed procedures continue to meet that need.</p> <p>WECC develops its procedure in accordance with the Rules of Procedure of the North American Electricity Reliability Corporation (Rules), Rule 311. Specifically, WECC’s development processes provide a balance of interests consistent with, though not identical to, the procedural attributes called for in the ANSI Requirements: Due Process Requirements for American National Standards (ANSI).</p>		

Organization	Yes or No	Question 3 Comment
		<p>ANSI requires that consensus be developed as part of the standards development process (ANSI 1.0 Essential Requirements of Due Process). Two critical attributes necessary to achieve consensus are: 1) that no single interest be allowed to dominate the development process (ANSI 1.2 Lack of Dominance), and 2) that participants from diverse interest groups be included in the process (ANSI 1.3 Balance). WECC further notes that the use of the 2/3 approach to obtain consensus is specifically contemplated under ANSI rules (ANSI 2.7 Evidence of Consensus and Consensus Body Vote).</p> <p>As proposed and previously approved by WECC/NERC and FERC, the procedures meet the above attributes. No further changes are contemplated.</p>

4. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below.

Summary Consideration:

Organization	Yes or No	Question 4 Comment
N/A		

5. Do you agree the revised WECC Reliability Development Procedures and WECC Common Attributes continues to meet the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below.

Summary Consideration:

Organization	Yes or No	Question 4 Comment
N/A		

END OF REPORT