

Consideration of Comments

Project Name:	Regional Reliability Standard VAR-001-5 (WECC Variance)
Comment Period Start Date:	6/22/2018
Comment Period End Date:	8/6/2018
Associated Ballots:	

There were 8 sets of responses, including comments from approximately 8 different people from approximately 7 companies representing 4 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [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 Senior Director of Standards and Education, [Howard Gugel](#) (via email) or at (404) 446-9693.

If you have any questions regarding the WECC Reliability Standards Development Procedures or this project, please contact WECC Consultant, [W. Shannon Black](#) at (503) 307-5782.

Questions

1. Do you agree the proposed standard/variance was developed in a fair and open process, using the associated Regional Reliability Standard Development Procedure?

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

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

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

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

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

WECC Summary Response:

The WECC-0128 VAR-001-5, Voltage and Reactive Control – WECC Regional Variance Drafting Team would like to thank everyone that participated in the standards development process. The value of each standard is enriched as the depth of participation increases.

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

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dennis Sismaet - Northern California Power Agency - 5,6

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Richard Jackson - U.S. Bureau of Reclamation - 1,5

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. Does the proposed standard/variance pose an adverse impact to reliability or commerce in a neighboring region or interconnection?	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
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	
Dennis Sismaet - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Marty Hostler - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	No
Document Name	

Comment

Likes 0

Dislikes 0

Response

In the absence of additional information from Black Hills, the project drafting team is unable to provide additional insights. WECC does note that the ballot passed at 100% at WECC.

3. Does the proposed standard/variance pose a serious and substantial threat to public health, safety, welfare, or national security?	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Sismaet - Northern California Power Agency - 5,6	
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	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	No
Document Name	

Comment

Likes 0

Dislikes 0

Response

In the absence of additional information from Black Hills, the project drafting team is unable to provide additional insights. WECC does note that the ballot passed at 100% at WECC.

4. Does the proposed standard/variance pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
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	
Dennis Sismaet - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Marty Hostler - Northern California Power Agency - 5,6	
Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	No
Document Name	

Comment

Likes 0

Dislikes 0

Response

In the absence of additional information from Black Hills, the project drafting team is unable to provide additional insights. WECC does note that the ballot passed at 100% at WECC.

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

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

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

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

Yes the variance has more specific criteria for voltage schedules and generator reference points.

- The proposed standard/variance has requirements that are not included in the corresponding continent-wide reliability standard.

Yes in that the variance doesn't have allowance for exemption criteria and includes transmission operator requirements for submitting data.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 5,6

Answer Yes

Document Name

Comment

Likes 0	
Dislikes 0	
Response	
Dennis Sismaet - Northern California Power Agency - 5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Kelsi Rigby - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	