Unofficial Comment Form

# Western Electricity Coordinating Council Reliability Standards Development Procedures

**DO NOT** use this form. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the latest version of the

*Western Electricity Coordinating Council (WECC) Reliability Standards Development Procedures.*

Comments must be submitted by **8 p.m. Eastern, Monday, May 1, 2017.**

If you have questions, contact Mat Bunch (via email) or at (404) 446-9785.

[Regional Reliability Standards – Under Development](http://www.nerc.com/pa/Stand/Pages/RegionalReliabilityStandardsUnderDevelopment.aspx)

### Background Information

Each NERC Regional Entity (RE) has a procedure for developing, revising, reaffirming, and withdrawing Regional Reliability Standards from that region. Regional Reliability Standards must set more stringent reliability requirements than the NERC Reliability Standards or cover matters not covered by an existing NERC Reliability Standard. When Regional Reliability Standards are approved by FERC and applicable authorities in Mexico and Canada, these standards are added to the body of NERC Reliability Standards that are enforced upon all applicable Bulk-Power System owners, operators, and users within the applicable area, regardless of membership in the region.

Before approving a RE’s Regional Reliability Standards development procedure, NERC must post the procedure for public comment. Evaluation of the proposed procedure includes identifying whether a proposed Regional Reliability Standards development procedure meets the criteria listed below. Each Regional Reliability Standards development procedure must meet all of the following criteria from the NERC Rules of Procedure, Section 311:

**Open —** The Regional Reliability Standards development procedure shall provide that any person or entity that is directly and materially affected by the reliability of the Bulk Power Systems within the RE shall be able to participate in the development and approval of Reliability Standards. There shall be no undue financial barriers to participation. Participation shall not be conditional upon membership in the RE, a RE or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

**Inclusive —** The Regional Reliability Standards development procedure shall provide that any person with a direct and material interest has a right to participate by expressing an opinion and its basis, having that position considered, and appealing through an established appeals process if adversely affected.

**Balanced —** The Regional Reliability Standards development procedure shall have a balance of interests and shall not be dominated by any two interest categories and no single interest category shall be able to defeat a matter.

**Due Process —** The Regional Reliability Standards development procedure shall provide for reasonable notice and opportunity for public comment. At a minimum, the procedure shall include public notice of the intent to develop a Regional Reliability Standard, a public comment period on the proposed Regional Reliability Standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent —** All actions and materials relating to the development of Regional Reliability Standards shall be transparent. All Regional Reliability Standards development meetings shall be open and publicly noticed on the RE’s website.

The WECC Reliability Standards Development Procedures are being revised to reflect a change in the NERC Compliance Registry, which leaves certain sectors unrepresented under the current WECC Reliability Standards Development Procedures. The revisions align the WECC voting sectors with the NERC voting segments by incorporating the NERC Rules of Procedure by reference. In addition, revisions include streamlined processes, clarified treatment of Standard Authorization Requests, a new section on field tests, and other clarifications.

Review the revised *WECC Reliability Standards Development Procedures* and answer the following questions.

**You do not have to answer all questions.**

*Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree the revised *WECC Reliability Standards Development Procedures* continue to meet the “Open” criteria as outlined above? If “No,” explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised *WECC Reliability Standards Development Procedures* continuetomeet the “Inclusive” criteria as outlined above? If “No,” explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised *WECC Reliability Standards Development Procedures* continue to meet the “Balanced” criteria as outlined above? If “No,” explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised *WECC Reliability Standards Development Procedures* continue to meet the “Due Process” criteria as outlined above? If “No,” explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree the revised *WECC Reliability Standards Development Procedures* continue to meet the “Transparent” criteria as outlined above? If “No,” explain in the comment area below.

[ ]  Yes

[ ]  No

Comments: