

February 15, 2019

**VIA ELECTRONIC FILING**

David Erickson  
President and Chief Executive Officer  
Alberta Electric System Operator  
2500, 330 - 5 Avenue SW  
Calgary, Alberta  
T2P 0L4

RE: *North American Electric Reliability Corporation*

Dear Mr. Erickson:

The North American Electric Reliability Corporation hereby submits Amendment to the Notice of Filing of the North American Electric Reliability Corporation of Retirement of Regional Reliability Standard PRC-004-WECC-2. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

NERC understands the AESO may adopt the proposed reliability standards subject to Alberta legislation, principally as established in the *Transmission Regulation* (“the T Reg.”). Briefly, it is NERC’s understanding that the T Reg. requires the following with regard to the adoption in Alberta of a NERC Reliability Standard:

1. The AESO must consult with those market participants that it considers are likely to be directly affected.
2. The AESO must forward the proposed reliability standards to the Alberta Utilities Commission for review, along with the AESO’s recommendation that the Commission approve or reject them.
3. The Commission must follow the recommendation of the AESO that the Commission approve or reject the proposed reliability standards unless an interested person satisfies the Commission that the AESO’s recommendation is “technically deficient” or “not in the public interest.”

Further, NERC has been advised by the AESO that the AESO practice with respect to the adoption of a NERC Reliability Standard includes a review of the NERC Reliability Standard for applicability to Alberta legislation and electric industry practice. NERC has been advised that, while the objective is to adhere as closely as possible to the requirements of the NERC Reliability Standard, each NERC Reliability Standard

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**Suite 600, North Tower**  
**Atlanta, GA 30326**  
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approved in Alberta (called an “Alberta reliability standard”) generally varies from the similar and related NERC Reliability Standard.

NERC requests the AESO consider the amendment to the retirement of Regional Reliability Standard PRC-004-WECC-2 in the filing for adoption in Alberta, subject to the required procedures and legislation of Alberta.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Shamai Elstein

Shamai Elstein  
*Senior Counsel for the North American Electric  
Reliability Corporation*

Enclosure

**BEFORE THE  
ALBERTA ELECTRIC SYSTEM OPERATOR**

**NORTH AMERICAN ELECTRIC )  
RELIABILITY CORPORATION )**

**AMENDMENT TO THE NOTICE OF FILING OF  
THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF  
RETIREMENT OF REGIONAL RELIABILITY STANDARD PRC-004-WECC-2**

The North American Electric Reliability Corporation (“NERC”) hereby submits an amendment to its March 22, 2018 filing of the retirement of WECC Regional Reliability Standard PRC-004-WECC-2 - Protection System and Remedial Action Scheme Misoperation.<sup>1</sup> In this filing, NERC provides notice of the retirement of WECC Regional Reliability Standard PRC-004-WECC-2 effective January 1, 2021, instead of immediately upon regulatory approval as proposed in the March 22, 2018 filing. This revised retirement date will coordinate the retirement of the Regional Reliability Standard with the effective date of continent-wide Reliability Standard PRC-012-2 – Remedial Action Schemes.

**Attachment 1** to this filing contains a revised implementation plan for the retirement of WECC Regional Reliability Standard PRC-004-WECC-2. This revised implementation plan is intended to replace the implementation plan included as Exhibit B to NERC’s March 22, 2018 filing. **Attachment 2** to this filing contains documentation related to the development and balloting of the revised implementation plan. This documentation is intended to supplement the Complete Record of Retirement Development included as Exhibit C to NERC’s March 22, 2018 filing.

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<sup>1</sup> *Notice of Filing of Retirement of Regional Reliability Standard PRC-004-WECC-2* (filed March 22, 2018) (“March 9, 2018 filing”).

## **I. MARCH 22, 2018 FILING**

On March 22, 2018, NERC provided notice of the retirement of WECC Regional Reliability Standard PRC-004-WECC-2 - Protection System and Remedial Action Scheme Misoperation. As explained in the filing, continent-wide standards have been developed since the initial development of the regional standard, thereby making the regional standard redundant and no longer necessary for reliability. In particular, Reliability Standard PRC-012-2, submitted to this authority on August 15, 2016, contains requirements for Remedial Action Scheme analysis.<sup>2</sup> Reliability Standard PRC-012-2 will become effective in the United States on January 1, 2021. The regional standard may therefore be retired at that time with no adverse effect on reliability. Further, its retirement will be in the public interest.

## **II. REVISED PRC-004-WECC-2 RETIREMENT DATE**

The retirement of WECC Regional Reliability Standard PRC-004-WECC-2 will be effective as of January 1, 2021 in accordance with the attached revised implementation plan (**Attachment 1**). This retirement date will allow for the coordination of the retirement of PRC-004-WECC-2 with the effective date of continent-wide Reliability Standard PRC-012-2. Following the retirement of WECC Regional Reliability Standard PRC-004-WECC-2, the two WECC defined terms that are now used only in the PRC-004-WECC-2 standard, Security-Based Misoperation and Dependability-Based Misoperation, would be considered retired as well.

## **III. SUMMARY OF REVISED IMPLEMENTATION PLAN DEVELOPMENT HISTORY**

In August 2018, a regional Standard Authorization Request (“SAR”) was submitted to revise the retirement date for WECC Regional Reliability Standard PRC-004-WECC-2 to

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<sup>2</sup> See March 22, 2018 filing at 8-11 and Exhibit A (Technical Justification) at Table A.

coordinate with the effective date of Reliability Standard PRC-012-2. The SAR was approved by the WECC Standards Committee on August 7, 2018.

WECC initiated Project WECC-0136 to ballot a revised retirement effective date for Regional Reliability Standard PRC-004-WECC-2. The revised retirement date was posted for a 30-day comment period from August 14, 2018 through September 14, 2018. The WECC Standards Committee approved the request for ballot by the WECC Ballot Pool on September 20, 2018. The ballot pool was open from September 27, 2018 through October 11, 2018, and the ballot was held from October 19, 2018 through November 2, 2018. The ballot achieved 78.0 percent quorum and 89.7 percent approval. The WECC Board of Directors approved the revised Regional Reliability Standard PRC-004-WECC-2 retirement date on December 5, 2018.

In accordance with Section 312 (Regional Reliability Standards) of NERC's Rules of Procedure,<sup>3</sup> NERC posted the revised retirement date for a 45-day comment period from December 7, 2018 through January 22, 2019. Commenters generally agreed that WECC's process was open, inclusive, balanced, transparent, and that due process was followed.<sup>4</sup> The NERC Board of Trustees approved the revised retirement date on February 7, 2019.

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<sup>3</sup> The NERC Rules of Procedure is available at <http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

<sup>4</sup> During the comment period, a minority opinion was expressed in favor of maintaining the original proposed retirement date for WECC Regional Reliability Standard PRC-004-WECC-2.

Respectfully submitted,

/s/ Lauren A. Perotti

Lauren A. Perotti  
Counsel  
North American Electric Reliability  
Corporation  
1325 G Street, N.W., Suite 600  
Washington, D.C. 20005  
(202) 400-3000  
(202) 644-8099– facsimile  
lauren.perotti@nerc.net

*Counsel for the North American Electric  
Reliability Corporation*

February 15, 2019

**Attachment 1**

**Revised Implementation Plan for the  
Retirement of WECC Regional Reliability Standard PRC-004-WECC-2**

# Implementation Plan WECC-0136 PRC-004-WECC-2 Protection System and Remedial Action Scheme Misoperation Request for Coordinated Retirement Date

## Standards Authorization Request (SAR)

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### WECC-0136 PRC-004-WECC-2 Standard Authorization Request

WECC-0136 proposes to align the retirement date of PRC-004-WECC-2, Protection Systems and Remedial Action Scheme Misoperation (PSRAS), with the January 1, 2021, implementation date of the North American Electric Reliability Corporation's (NERC) Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes (RAS). This is a coordinated request from WECC and NERC.

## Background

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On February 8, 2018, the NERC Board of Trustees approved WECC's request to retire the PSRAS as part of WECC's project WECC-0126. The WECC-0126 Implementation Plan requested a retirement date "immediately upon regulatory approval." After reviewing the request to retire, along with the NERC RAS project, NERC, in coordination with the Federal Energy Regulatory Commission (FERC), has suggested a coordinated retirement date of January 1, 2021.

This project and this posting request comments only on whether the retirement date should coordinate with the January 1, 2021, implementation date of the NERC-related project.

## Approvals Required

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- |                           |                  |
|---------------------------|------------------|
| • WECC Board of Directors | December 5, 2018 |
| • NERC Board of Trustees  | Pending          |
| • FERC                    | Pending          |

## Applicable Entities

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### 4. Applicability

- 4.1. Transmission Owners of selected WECC major transmission path facilities and RAS listed in tables titled "Major WECC Transfer Paths in the Bulk Electric System" provided at <https://www.wecc.biz/Reliability/TableMajorPaths4-28-08.pdf> and "Major WECC Remedial Action Schemes (RAS)" provided at <https://www.wecc.biz/Reliability/TableMajorRAS4-28-08.pdf>.
- 4.2. Generator Owners that own RAS listed in the table titled "Major WECC Remedial Action Schemes (RAS)" provided at <https://wecc.biz/Reliability/TableMajorRAS4-28-08.pdf>.





- 4.3.** Transmission Operators that operate major transmission path facilities and RAS listed in Tables titled “Major WECC Transfer Paths in the Bulk Electric System” provided at <https://www.wecc.biz/Reliability/TableMajorPaths4-28-08.pdf> and “Major WECC Remedial Action Schemes (RAS)” provided at <https://www.wecc.biz/Reliability/TableMajorRAS4-28-08.pdf>.

### **Conforming Changes to Other Standards**

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The entire standard is proposed for retirement as of January 1, 2021, because the reliability-related content is addressed in other NERC Standards. The WECC-0126 PSRAS Drafting Team (DT) does not believe further actions are necessary to implement the retirement.

### **Proposed Retirement Date (Effective Date)**

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Retirement of the PSRAS is proposed for January 1, 2021, coincident with the implementation date of NERC’s Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes.

### **Justification**

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The WECC-0126 Drafting Team reviewed NERC Standards, both in effect and proposed for regulatory approval. The drafting team also considered the development history of PRC-004-WECC-2 and its historical performance.

What follows are the findings and justification for full retirement of the PSRAS. A detailed analysis of each of the following bullets was included with the WECC-0126 filing with NERC.

1. The reliability concern for which the original standard was drafted is now covered in FAC-003-4 Transmission Vegetation Management (enforceable October 1, 2016).
2. The Applicability section is overly narrow and included in other existing NERC Standards.
3. Requirement R1 is covered in other NERC Standards.
4. Requirement R2 is covered in other NERC Standards, conflicts with existing NERC Standards, and its application can lessen reliability.
5. Requirement R3 is administrative in nature and should be retired under FERC P81 criteria.
6. The language of the standard does not meet the FERC Order 672 criteria in that it does not assign the reliability task directly to an entity included in the NERC Functional Model.

### **Consideration of Early Compliance**

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The WECC-0126 Drafting Team reported no concerns with early compliance.

## Required Retirements

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The PSRAS should be retired completely as of the January 1, 2021, implementation date of NERC's Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes.

**Attachment 2**

**Complete Record of Retirement Development  
Regarding the Revised Implementation Plan for the  
Retirement of WECC Regional Reliability Standard PRC-004-WECC-2**

**Steven Rueckert**  
155 North 400 West  
Salt Lake City, Utah  
84103

January 30, 2019

**Subject:** Notification of Completion  
WECC-0136 PRC-004-WECC-2 Request for Coordinated Retirement Date  
Protection System and Remedial Action Scheme Misoperation  
Request to Retire a Regional Reliability Standard

**To:** Ms. Nasheema Santos  
NERC Reliability Standards Department  
North American Electric Reliability Corporation  
3353 Peachtree Rd. NE, North Tower—Suite 60  
Atlanta, GA 30326

Dear Nasheema,

In accordance with the Western Electricity Coordinating Council's (WECC) Reliability Standards Development Procedures, the WECC-0136 PRC-004-WECC-2, Request for Coordinated Retirement Date Drafting Team has completed its assigned project. The proposed coordinated retirement date of the standard has been approved by the WECC Ballot Pool and the WECC Board of Directors.

The NERC Board of Trustees (BOT) is requested to approve the coordinated retirement date of PRC-004-WECC-2 during its February 7, 2019 meeting. WECC is seeking disposition by the Federal Energy Regulatory Commission, to retire PRC-004-WECC-2 on January 1, 2021. The reliability related content of the standard is covered in other NERC Standards.

Thank you for your assistance.

Sincerely,

Steven Rueckert  
Director of Standards  
Western Electricity Coordinating Council



WESTERN ELECTRICITY COORDINATING COUNCIL  
155 North 400 West, Suite 200  
Salt Lake City, Utah 84103-1114

Supporting Documentation  
 WECC-0136 PRC-004-WECC-2  
 Protection System and Remedial Action Scheme Misoperation  
 Request for Coordinated Retirement Date

For documentation support, please contact Mr. W. Shannon Black, [sblack@wecc.biz](mailto:sblack@wecc.biz), (503) 307-5782.

<b>WECC-0136 PRC-004-WECC-2          Protection System and Remedial Action Scheme          Misoperation Request for Coordinated Retirement Date</b>				
<b>SAR – Standard Authorization Request Attachment A (1)</b>				
<b>Implementation Plan Attachment B (2)</b>				
<b>Drafting Team Biographies Attachment C (3)</b>				
<b>Final Ballot Results Attachment D (4)</b>				
<b>Response to Comments WECC Attachment E (5)</b>				
PRC-004-WECC-2 (Retirement)	Protection System and Remedial Action Scheme Misoperation	Standard Under Development	<b>2<sup>nd</sup> Comment          Period</b>  12/07/18 – 1/22/19 **newly proposed retirement date	Info (6)  Revised Retirement Date – WECC Final Balot Result (7)  Submit Comments  Unofficial Comment Form (Word) (8)  Consideration of Comments (9)

# Standard Authorization Request WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Scheme Misoperation Request to Change Retirement Date

This Standard Authorization Request (SAR) was received August 1, 2018, and deemed complete the same day. The WECC Standards Committee (WSC) will vet the SAR during their August 7, 2018, meeting.

### Version Control

References to WECC-0126 PRC-004-WECC-3 denote only the technical justification project to retire PRC-004-WECC-2, Protection Systems and Remedial Action Scheme Misoperation. Neither this SAR nor WECC-0126 propose creation of an iterative standard designated as PRC-004-WECC-3.

### Effective Date / Retirement Date

The Implementation Plan for WECC-0126, requests an effective date “Immediately upon receipt of applicable regulatory approval.” Because WECC-0126 is a request to retire, the proposed effective date is the same as the proposed retirement date.

### Introduction

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This SAR, coupled with WECC-0126 would coordinate the retirement date of PRC-004-WECC-2 with NERC’s Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes (RAS).

### Requester Information

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1. Provide your contact information and your alternate’s contact information:

- Your First Name: W. Shannon
- Your Last Name: Black
- Your Email Address: sblack@wecc.biz
- Your Phone Number: (503) 307-5782
- Organization Name: WECC
- Alternate’s First Name: Steven
- Alternate’s Last Name: Rueckert
- Alternate’s Email Address: steve@wecc.biz
- Alternate’s Phone Number: (801) 883-6878



## Type of Request

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### 2. Specify the type of request: (select one)

- This is a request to coordinate the retirement date of PRC-004-WECC-2 with the January 1, 2021, effective date of NERC Reliability Standard PRC-012-2, Remedial Action Scheme (Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes).
- Project 2010-05.3, as approved by the NERC Board of Trustees (BOT) on May 5, 2016, establishes a new working framework between RAS entities, Planning Coordinators (PC), and Reliability Coordinators (RC), culminating in an effective date of January 1, 2021.

## Create, Modify, or Retire a Document Questions

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Provide the requested information for your request to create, modify, or retire the document.

### 3. Request Action: (select one)

- Request to coordinate the retirement date of PRC-004-WECC-2 with the effective date of PRC-012-2.

### 4. Document Type: (select one)

- NERC Standard / WECC Regional Reliability Standard

### 5. Issue: Specify what industry problem this request is trying to resolve.

On February 8, 2018, the BOT approved WECC's request to retire PRC-004-WECC-2, with a proposed effective date/retirement date "Immediately upon receipt of applicable regulatory approval." Procedurally, NERC's decision is subject to review by the Federal Energy Regulatory Commission (FERC).

After further review, a request was made to coordinate the retirement date of PRC-004-WECC-2 with the January 1, 2021, effective date of PRC-012-2.

If the PRC-004-WECC-2 retirement date is approved by FERC, retirement of PRC-004-WECC-2 would be added to the following PRC-012-2 project actions, all of which would be effective January 1, 2021:

(Withdraw)

- 1) PRC-012-1—Remedial Action Scheme Review Procedure;
- 2) PRC-013-1—Remedial Action Scheme Database; and
- 3) PRC-014-1—Remedial Action Scheme Assessment.

(Retire)

- 1) PRC-015-1—Remedial Action Scheme Data and Documentation;
- 2) PRC-016-1—Remedial Action Scheme Misoperations; and

3) PRC-004-WECC-2—Protection Systems and Remedial Action Scheme Misoperation.

**Special Note:** Because this request is administrative in nature, this SAR requests that the DT consist solely of WECC Standards Department personnel, as assigned by the WECC Director of Standards.

6. Proposed Remedy: Specify how this request proposes to address the issue described.  
Coordinate the dates as proposed.
7. Functions: Each function will be reviewed if affected.
  - Transmission Owners of selected WECC major transmission path facilities and RAS listed in tables titled “Major WECC Transfer Paths in the Bulk Electric System” provided at <https://www.wecc.biz/Reliability/TableMajorPaths4-28-08.pdf> and “Major WECC Remedial Action Schemes (RAS)” provided at <https://www.wecc.biz/Reliability/TableMajorRAS4-28-08.pdf>.
  - Generator Owners that own RASs listed in the table titled “Major WECC Remedial Action Schemes (RAS)” provided at <https://www.wecc.biz/Reliability/TableMajorRAS4-28-08.pdf>.
  - Transmission Operators that operate major transmission path facilities and RASs listed in tables titled “Major WECC Transfer Paths in the Bulk Electric System” provided at <https://www.wecc.biz/Reliability/TableMajorPaths4-28-08.pdf> and “Major WECC Remedial Action Schemes (RAS)” provided at <https://www.wecc.biz/Reliability/TableMajorRAS4-28-08.pdf>.
8. Detailed Description: See 5 above.
9. Affected Reliability Principles: Which of the following Reliability Principles is MOST affected by this request? (select one)
  - **NERC Reliability Principle #7:** The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis

### Document Information

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Specify the document title, document number, and affected section regarding the request.

Document Title: See 5 above.

### Reference Uploads

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Please reference or upload any affected Standards, Regional Business Practices, Criterion, Policies, White Papers, Technical Reports, or other relevant documents. If this request is based on a conflict of law, please include a copy of, or accessible reference to, the specific law or regulatory mandate in conflict.

Provide additional comments (if needed):

Approved NERC continentwide standards and WECC Regional Reliability Standards are available on NERC’s Reliability Standards website. <https://www.nerc.com/pa/Stand/Pages/ReliabilityStandards.aspx>



## Implementation Plan WECC-0136 PRC-004-WECC-2 Protection System and Remedial Action Scheme Misoperation Request for Coordinated Retirement Date Posting 1 August 14–September 14, 2018

### Standards Authorization Request (SAR)

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#### [WECC-0136 PRC-004-WECC-2 Standard Authorization Request](#)

WECC-0136 proposes to align the retirement date of PRC-004-WECC-2, Protection Systems and Remedial Action Scheme Misoperation (PSRAS), with the January 1, 2021, implementation date of the North American Electric Reliability Corporation’s (NERC) Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes (RAS). This is a coordinated request from WECC and NERC.

### Background

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On February 8, 2018, the NERC Board of Trustees approved WECC’s request to retire the PSRAS as part of WECC’s project WECC-0126. The WECC-0126 Implementation Plan requested a retirement date “immediately upon regulatory approval.” After reviewing the request to retire, along with the NERC RAS project, NERC, in coordination with the Federal Energy Regulatory Commission (FERC), has suggested a coordinated retirement date of January 1, 2021.

This project and this posting request comments only on whether the retirement date should coordinate with the January 1, 2021, implementation date of the NERC-related project.

### Approvals Required

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- |                           |                  |
|---------------------------|------------------|
| • WECC Board of Directors | December 5, 2018 |
| • NERC Board of Trustees  | Pending          |
| • FERC                    | Pending          |

### Applicable Entities

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#### 4. Applicability

- 4.1.** Transmission Owners of selected WECC major transmission path facilities and RAS listed in tables titled “Major WECC Transfer Paths in the Bulk Electric System” provided at <https://www.wecc.biz/Reliability/TableMajorPaths4-28-08.pdf> and “Major WECC Remedial



Action Schemes (RAS)” provided at <https://www.wecc.biz/Reliability/TableMajorRAS4-28-08.pdf>.

4.2. Generator Owners that own RAS listed in the table titled “Major WECC Remedial Action Schemes (RAS)” provided at <https://wecc.biz/Reliability/TableMajorRAS4-28-08.pdf>.

4.3. Transmission Operators that operate major transmission path facilities and RAS listed in Tables titled “Major WECC Transfer Paths in the Bulk Electric System” provided at <https://www.wecc.biz/Reliability/TableMajorPaths4-28-08.pdf> and “Major WECC Remedial Action Schemes (RAS)” provided at <https://www.wecc.biz/Reliability/TableMajorRAS4-28-08.pdf>.

### Conforming Changes to Other Standards

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The entire standard is proposed for retirement as of January 1, 2021, because the reliability-related content is addressed in other NERC Standards. The WECC-0126 PSRAS Drafting Team (DT) does not believe further actions are necessary to implement the retirement.

### Proposed Retirement Date (Effective Date)

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Retirement of the PSRAS is proposed for January 1, 2021, coincident with the implementation date of NERC’s Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes.

### Justification

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The WECC-0126 Drafting Team reviewed NERC Standards, both in effect and proposed for regulatory approval. The drafting team also considered the development history of PRC-004-WECC-2 and its historical performance.

What follows are the findings and justification for full retirement of the PSRAS. A detailed analysis of each of the following bullets was included with the WECC-0126 filing with NERC.

1. The reliability concern for which the original standard was drafted is now covered in FAC-003-4 Transmission Vegetation Management (enforceable October 1, 2016).
2. The Applicability section is overly narrow and included in other existing NERC Standards.
3. Requirement R1 is covered in other NERC Standards.
4. Requirement R2 is covered in other NERC Standards, conflicts with existing NERC Standards, and its application can lessen reliability.
5. Requirement R3 is administrative in nature and should be retired under FERC P81 criteria.
6. The language of the standard does not meet the FERC Order 672 criteria in that it does not assign the reliability task directly to an entity included in the NERC Functional Model.

### **Consideration of Early Compliance**

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The WECC-0126 Drafting Team reported no concerns with early compliance.

### **Required Retirements**

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The PSRAS should be retired completely as of the January 1, 2021, implementation date of NERC's Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes.

Drafting Team Roster  
 WECC-0136 PRC-004-WECC-2  
 Protection System and RAS Misoperation

Below please find a biographical snapshot for the members of the WECC-0136 PRC-004-WECC-2 Protection System and RAS Misoperation—Request for Coordinated Retirement Date Drafting Team.

Name	Background
<p>Steven Rueckert,  Western Electricity Coordinating Council</p>	<p>Steve Rueckert is the Western Electricity Coordinating Council’s (WECC) Director of Standards. His duties include supervision of WECC’s role in the NERC/ERO standards development activities and WECC’s regional reliability standards development process. Mr. Rueckert is one of two Regional representatives on the NERC Standards Committee.</p> <p>Prior to his current position, Steve was the Director, Member Planning Support for WECC, where his responsibilities included support of the WECC Planning Coordination Committee (PCC) and its subcommittees and work groups. In this role, Steve was WECC’s representative on the PCC. Steve has also represented the WECC staff on the WECC Reliability Subcommittee, the WECC Technical Studies Subcommittee, and the WECC System Review Work Group.</p> <p>Mr. Rueckert’s long career began in 1984 working with WECC’s predecessor, the Western Systems Coordinating Council (WSCC). In 1993, he accepted a position in the Transmission Planning Department at PacifiCorp, where he worked until returning to WSCC in 1996.</p> <p>Mr. Rueckert holds a Bachelor of Science degree in electrical engineering from the University of Utah.</p>
<p>W. Shannon Black,  Western Electricity Coordinating Council</p>	<p>Mr. Black holds a Juris Doctorate from the University of the Pacific, McGeorge School of Law.</p> <p>Mr. Black has 20 years of experience in the utility industry, having spent 10 years with the Sacramento Municipal Utility District (SMUD) and 10 years with the Western Electricity Coordinating Council.</p> <p>While at SMUD, Mr. Black served as a senior contract specialist where he negotiated, drafted, and administered power and transmission contracts. During the 2007 transition into a regulated environment, Mr. Black served as a subject matter expert on SMUD contracts and its interface with the newly formed California Independent System Operator (CAISO) while analyzing and briefing executive management on the first 72 CAISO Tariff Amendments and associated Business Practices. During this period, he also served on multiple NERC drafting teams.</p>



	<p>While at WECC, Mr. Black initially served as the moderator and staff liaison for the Market Issues Subcommittee while simultaneously serving as the standards processes manager. Since 2009, Mr. Black has been responsible for development and final preparation of an estimated 80 standards-related projects. Mr. Black has moderated an estimated 500 drafting-team meetings since his assignment to the WECC Standards Department and supports, at board-level, the WECC Standards Committee.</p>
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## Final Ballot Results / WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes Misoperations (PSRAS) Request for Coordinated Retirement Date

**Ballot Name:** WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes (PSRAS) Misoperations Request for Coordinated Retirement Date

**Overview:** After reviewing the request to retire, along with the NERC RAS project, NERC, in coordination with the Federal Energy Regulatory Commission (FERC) has suggested a coordinated retirement date of January 1, 2021.

The entire standard is proposed for retirement as of January 1, 2021, because the reliability-related substance is addressed in peripheral NERC Standards.

**Ballot Pool Open:** 09/27/2018      **Ballot Opened:** 10/19/2018

**Ballot Pool Closed:** 10/11/2018      **Ballot Closed:** 11/05/2018

**Total Ballot Pool:** 50      **Total Votes:** 39

**Quorum:** 78.0%      **Weighted Approval:** 89.7%

**Ballot Results:** **Pass**

Voting Sectors	Total In Ballot Pool	In Pool Affiliates Excluded	Votes Non-Abstain	Sector Weight	Yes Votes	Weighted Segment Vote	No Votes	Abstain	Total Votes for Quorum	Didn't Vote
Transmission Owners	14		11	1	10	90.9%	1	0	11	3
Regional Transmission Organizations (RTO) and Independent System Operators (ISO)	1		1	0.1	1	10.0%	0	0	1	0
Load-Serving Entities (LSE)	12		9	0.9	8	80.0%	1	0	9	3
Transmission Dependent Utilities (TDU)	2		2	0.2	2	20.0%	0	0	2	0
Electric Generators	11		9	0.9	8	80.0%	1	0	9	2
Electricity Brokers, Aggregators, and Marketers	10		7	0.7	6	60.0%	1	0	7	3
Large Electricity End Users	0		0	0	0	0.0%	0	0	0	0
Small Electricity Users	0		0	0	0	0.0%	0	0	0	0
Federal, State, and Provincial Regulatory or other Government Entities	0		0	0	0	0.0%	0	0	0	0
Regional Entities	0		0	0	0	0.0%	0	0	0	0
<b>Totals</b>	<b>50</b>	<b>0</b>	<b>39</b>	<b>3.8</b>	<b>35</b>	<b>89.7%</b>	<b>4</b>	<b>0</b>	<b>39</b>	<b>11</b>



## WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes (PSRAS) Misoperations Request for Coordinated Retirement Date

**Ballot Pool**

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	Arizona Public Service Company	Electricity Brokers, Aggregators, and Marketers	Yes	0	Nicholas Kirby
WECC-0136	Arizona Public Service Company	Load-Serving Entities (LSE)	Yes	0	Vivian Vo
WECC-0136	Arizona Public Service Company	Electric Generators	Yes	0	Kelsi Rigby
WECC-0136	Arizona Public Service Company	Transmission Owners	Yes	0	Michelle Amarantos
WECC-0136	Balancing Authority of Northern California	Transmission Owners	Yes	0	Joe Tarantino
WECC-0136	Balancing Authority of Northern California	Electricity Brokers, Aggregators, and Marketers	Yes	0	Joe Tarantino
WECC-0136	Bonneville Power Administration	Electricity Brokers, Aggregators, and Marketers	Yes	0	Andrew Meyers
WECC-0136	Bonneville Power Administration	Transmission Owners	Yes	0	Kammy Rogers-Holliday
WECC-0136	Bonneville Power Administration	Load-Serving Entities (LSE)	Yes	0	Rebecca Berdahl

## WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes (PSRAS) Misoperations Request for Coordinated Retirement Date

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	British Columbia Hydro & Power Authority	Electric Generators	Yes	0	Adrian Andreoiu
WECC-0136	British Columbia Hydro & Power Authority	Load-Serving Entities (LSE)	Yes	0	Adrian Andreoiu
WECC-0136	British Columbia Hydro & Power Authority	Transmission Owners	Yes	0	Adrian Andreoiu
WECC-0136	California Independent System Operator	Regional Transmission Organizations (RTO) and Independent System Operators (ISO)	Yes	0	Richard Vine
WECC-0136	Idaho Power Company	Electric Generators	Yes	0	Laura Nelson
WECC-0136	Idaho Power Company	Transmission Owners	Yes	0	Laura Nelson
WECC-0136	Idaho Power Company	Load-Serving Entities (LSE)	Yes	0	Laura Nelson
WECC-0136	Los Angeles Department of Water and Power	Transmission Owners	No	LDWP recommends retiring at a sooner date than 2021.	Pjoy Chua
WECC-0136	Los Angeles Department of Water and Power	Load-Serving Entities (LSE)	No	LDWP recommends retiring at a sooner date than 2021.	Pjoy Chua



## WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes (PSRAS) Misoperations Request for Coordinated Retirement Date

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	Los Angeles Department of Water and Power	Electricity Brokers, Aggregators, and Marketers	No	LDWP recommends retiring at a sooner date than 2021.	Pjoy Chua
WECC-0136	Los Angeles Department of Water and Power	Electric Generators	No	LDWP recommends retiring at a sooner date than 2021.	Pjoy Chua
WECC-0136	Platte River Power Authority	Load-Serving Entities (LSE)	Yes	0	Jeff Landis
WECC-0136	Platte River Power Authority	Electricity Brokers, Aggregators, and Marketers	Yes	0	Sabrina Martz
WECC-0136	Platte River Power Authority	Transmission Owners	Yes	0	Matthew Thompson
WECC-0136	Platte River Power Authority	Electric Generators	Yes	0	Tyson Archie
WECC-0136	Public Service Company of Colorado (Xcel Energy)	Electric Generators	Yes	0	Gerry Huitt
WECC-0136	Public Service Company of Colorado (Xcel Energy)	Electricity Brokers, Aggregators, and Marketers	0	0	Carrie Simpson
WECC-0136	Public Service Company of New Mexico	Load-Serving Entities (LSE)	0	0	Laurie Williams

## WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes (PSRAS) Misoperations Request for Coordinated Retirement Date

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	Public Service Company of New Mexico	Electricity Brokers, Aggregators, and Marketers	0	0	Laurie Williams
WECC-0136	Public Service Company of New Mexico	Transmission Owners	0	0	Laurie Williams
WECC-0136	Public Service Company of New Mexico	Electric Generators	0	0	Laurie Williams
WECC-0136	Sacramento Municipal Utility District	Electric Generators	Yes	0	Joe Tarantino
WECC-0136	Sacramento Municipal Utility District	Transmission Dependent Utilities (TDU)	Yes	0	Joe Tarantino
WECC-0136	Sacramento Municipal Utility District	Transmission Owners	Yes	0	Joe Tarantino
WECC-0136	Sacramento Municipal Utility District	Load-Serving Entities (LSE)	Yes	0	Joe Tarantino
WECC-0136	Sacramento Municipal Utility District	Electricity Brokers, Aggregators, and Marketers	Yes	0	Joe Tarantino
WECC-0136	Salt River Project	Electricity Brokers, Aggregators, and Marketers	Yes	0	Bobby Olsen
WECC-0136	Salt River Project	Load-Serving Entities (LSE)	Yes	0	Robert Kondziolka
WECC-0136	Salt River Project	Electric Generators	Yes	0	Kevin Nielsen

## WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes (PSRAS) Misoperations Request for Coordinated Retirement Date

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	Seattle City Light	Transmission Dependent Utilities (TDU)	Yes	0	Hao Li
WECC-0136	Seattle City Light	Transmission Owners	0	0	Tuan Tran
WECC-0136	Seattle City Light	Load-Serving Entities (LSE)	0	0	Tuan Tran
WECC-0136	Seattle City Light	Electricity Brokers, Aggregators, and Marketers	0	0	Charles Freeman
WECC-0136	Tri-State Generation & Transmission - Reliability	Transmission Owners	Yes	0	Tracy Sliman
WECC-0136	Tri-State Generation & Transmission - Reliability	Load-Serving Entities (LSE)	0	0	Janelle Gill
WECC-0136	Tucson Electric Power	Electric Generators	Yes	0	John Tolo
WECC-0136	Tucson Electric Power	Transmission Owners	Yes	0	John Tolo
WECC-0136	Tucson Electric Power	Load-Serving Entities (LSE)	Yes	0	John Tolo
WECC-0136	US Bureau of Reclamation	Transmission Owners	0	0	Wendy Center
WECC-0136	US Bureau of Reclamation	Electric Generators	0	0	Wendy Center
WECC-0136	Western Area Power Administration	Transmission Owners	Yes	0	sean er

# WECC-0136 PRC-004-WECC-2 Protection System and Remedial Action Scheme Misoperation Request for Coordinated Retirement Date Response to Comments / Posting 1 August 14 through September 14, 2018

## Posting 1

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The WECC-0136 PRC-004-WECC-2, Protection System and Remedial Action Scheme (PSRAS) Misoperation, Request for Coordinated Retirement Date Drafting Team (DT) thanks everyone who submitted comments on the proposed document.

## Posting

This project was posted for a 30-day public comment period from August 14 through September 14, 2018.

WECC distributed the notice for the posting on August 14, 2018. The DT asked stakeholders to provide feedback on the proposed document through a standardized electronic template. One comment was received on this posting.

## Location of Comments

All comments received on the project can be viewed in their original format on the WECC-0136 project page under the “Submit and Review Comments” accordion.

## Changes in Response to Comment

In response to comments received, the WECC-0136 DT made no further substantive changes. The sole respondent concurred with the DT that retirement of the document should be coordinated with the North American Electricity Reliability Corporation (NERC) Project 2010-05.3, Phase 3 of Protection Systems: Remedial Action Scheme.

## Minority View

There is no minority view.

## Effective Date

The WECC-0136 DT is recommending retirement of the PSRAS as of January 1, 2021, coincident with the implementation date of NERC’s Project 2010-05.3 Phase 3 of Protection Systems: Remedial Action Schemes.



**Action Plan**

On September 19, 2018, the WECC-0136 DT agreed by majority vote to send the project to the WECC Standards Committee (WSC) with a request for ballot.

No further postings are anticipated.

**Contacts and Appeals**

If you feel your comment has been omitted or overlooked, please contact [W. Shannon Black](#), WECC Consultant, at (503) 307-5782. In addition, there is a WECC Reliability Standards appeals process.

Commenter		Organization
1	Michelle Amarantos	Arizona Public Service Company

## Index to Questions, Comments, and Responses

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### Question

1. The Drafting Team welcomes comments on all aspects of the document.

1. The Drafting Team welcomes comments on all aspects of the document.

Summary Consideration:		See summary in the preamble of this document.	
Commenter / Comment		Response	
Arizona Public Service Company		AZPS supports the Drafting Team’s proposal to align the retirement date of PRC-004-WECC-2 with the implementation of NERC Project 2015-05.3.	
The DT appreciates the Arizona Public Service Company’s continued involvement in the standards development process.			

# Regional Reliability Standards Announcement

## Western Electricity Coordinating Council Revised Retirement Date of PRC-004-WECC-2

**Comment Period Open through January 22, 2019**

### [Now Available](#)

The Western Electricity Coordinating Council (WECC) has requested NERC to post the proposed revised retirement date of Regional Reliability Standard PRC-004-WECC-3 - Protection System and Remedial Action Scheme Misoperation (Retirement) for industry review and comment as permitted by the NERC Rules of Procedure.

### **Background**

The NERC Board of Trustees approved the retirement of the regional standard at its February 2018 meeting; the retirement is currently pending regulatory approval. WECC initially proposed to retire the regional standard effective upon regulatory approval. WECC is proposing a revised retirement date of January 1, 2021 to coordinate the retirement of the regional standard with the effective date of continent-wide Reliability Standard PRC-012-2.

The WECC Board of Trustees approved the revised retirement date for PRC-004-WECC-2 on December 6, 2018.

### **Commenting**

Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments. If you experience any difficulties using the electronic form, contact [Nasheema Santos](#). The form must be submitted by **8 p.m. Eastern, Tuesday, January 22, 2019**. An unofficial Word version of the comment form is posted on the [Regional Reliability Standards Under Development](#) page.

### **Regional Reliability Standards Development Process**

Section 300 of [NERC's Rules of Procedures of the Electric Reliability Organization](#) governs the regional reliability standards development process. Although the technical aspects of this Regional Reliability Standard have been vetted through WECC's Regional Standards development process, the final approval process for a Regional Reliability Standard requires NERC publicly to notice and request comment on the criteria outlined in the unofficial comment forms.

Documents and information about this project are available on the [WECC's Standards Under Development](#) page.



For more information or assistance, contact Manager of Standards Information, [Chris Larson](#) (via email) or at (404) 446-9708.

North American Electric Reliability Corporation  
3353 Peachtree Rd, NE  
Suite 600, North Tower  
Atlanta, GA 30326  
404-446-2560 | [www.nerc.com](http://www.nerc.com)

**Attachment N**  
Final Ballot Results  
WECC-0136

**PRC-004-WECC-2 Protection Systems and Remedial Action Schemes Misoperations  
(PSRAS) Request for Coordinated Retirement Date**

**Ballot Name:** WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes Misoperations (PSRAS) Request for Coordinated Retirement Date

**Overview:** After reviewing the request to retire, along with the NERC RAS project, NERC, in coordination with the Federal Energy Regulatory Commission (FERC) has suggested a coordinated retirement date of January 1, 2021.  
The entire standard is proposed for retirement as of January 1, 2021, because the reliability-related substance is addressed in peripheral NERC Standards.

Ballot Pool Open: 09/27/2018      Ballot Opened: 10/19/2018  
Ballot Pool Closed: 10/11/2018      Ballot Closed: 11/05/2018

Total Ballot Pool: 50      Total Votes: 39  
Quorum: 78.0%      Weighted Votes: 89.7%

**Ballot Results: Pass**

Voting Sectors	Total In Ballot Pool	In Pool Affiliates Excluded	Votes Non-Abstain	Sector Weight	Yes Votes	Weighted Segment Vote	No Votes	Abstain	Total Votes for Quorum	Didn't Vote
Transmission Owners	14		11	1	10	90.9%	1	0	11	3
Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs)	1		1	0.1	1	10.0%	0	0	1	0
Load-Serving Entities (LSEs)	12		9	0.9	8	80.0%	1	0	9	3
Transmission Dependent Utilities (TDUs)	2		2	0.2	2	20.0%	0	0	2	0
Electric Generators	11		9	0.9	8	80.0%	1	0	9	2
Electricity Brokers, Aggregators, and Marketers	10		7	0.7	6	60.0%	1	0	7	3
Large Electricity End Users	0		0	0	0	0.0%	0	0	0	0
Small Electricity Users	0		0	0	0	0.0%	0	0	0	0
Federal, State, and Provincial Regulatory or other Government Entities	0		0	0	0	0.0%	0	0	0	0
Regional Entities	0		0	0	0	0.0%	0	0	0	0
<b>Totals</b>	<b>50</b>	<b>0</b>	<b>39</b>	<b>3.8</b>	<b>35</b>	<b>89.7%</b>	<b>4</b>	<b>0</b>	<b>39</b>	<b>11</b>

**Attachment N—Final Ballot Results**

WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes Misoperations (PSRAS) Request for Coordinated Retirement Date

**Ballot Pool**

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	Arizona Public Service Company	Electricity Brokers, Aggregators, and Marketers	Yes	0	Nicholas Kirby
WECC-0136	Arizona Public Service Company	Load-Serving Entities (LSEs)	Yes	0	Vivian Vo
WECC-0136	Arizona Public Service Company	Electric Generators	Yes	0	Kelsi Rigby
WECC-0136	Arizona Public Service Company	Transmission Owners	Yes	0	Michelle Amarantos
WECC-0136	Balancing Authority of Northern California	Transmission Owners	Yes	0	Joe Tarantino
WECC-0136	Balancing Authority of Northern California	Electricity Brokers, Aggregators, and Marketers	Yes	0	Joe Tarantino
WECC-0136	Bonneville Power Administration	Electricity Brokers, Aggregators, and Marketers	Yes	0	Andrew Meyers
WECC-0136	Bonneville Power Administration	Transmission Owners	Yes	0	Kammy Rogers-Holliday
WECC-0136	Bonneville Power Administration	Load-Serving Entities (LSEs)	Yes	0	Rebecca Berdahl

## Attachment N—Final Ballot Results

### WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes Misoperations (PSRAS) Request for Coordinated Retirement Date

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	British Columbia Hydro & Power Authority	Electric Generators	Yes	0	Adrian Andreoiu
WECC-0136	British Columbia Hydro & Power Authority	Load-Serving Entities (LSEs)	Yes	0	Adrian Andreoiu
WECC-0136	British Columbia Hydro & Power Authority	Transmission Owners	Yes	0	Adrian Andreoiu
WECC-0136	California Independent System Operator	Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs)	Yes	0	Richard Vine
WECC-0136	Idaho Power Company	Electric Generators	Yes	0	Laura Nelson
WECC-0136	Idaho Power Company	Transmission Owners	Yes	0	Laura Nelson
WECC-0136	Idaho Power Company	Load-Serving Entities (LSEs)	Yes	0	Laura Nelson
WECC-0136	Los Angeles Department of Water and Power	Transmission Owners	No	LDWP recommends retiring at a sooner date than 2021.	Pjoy Chua
WECC-0136	Los Angeles Department of Water and Power	Load-Serving Entities (LSEs)	No	LDWP recommends retiring at a sooner date than 2021.	Pjoy Chua

## Attachment N—Final Ballot Results

### WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes Misoperations (PSRAS) Request for Coordinated Retirement Date

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	Los Angeles Department of Water and Power	Electricity Brokers, Aggregators, and Marketers	No	LDWP recommends retiring at a sooner date than 2021.	Pjoy Chua
WECC-0136	Los Angeles Department of Water and Power	Electric Generators	No	LDWP recommends retiring at a sooner date than 2021.	Pjoy Chua
WECC-0136	Platte River Power Authority	Load-Serving Entities (LSEs)	Yes	0	Jeff Landis
WECC-0136	Platte River Power Authority	Electricity Brokers, Aggregators, and Marketers	Yes	0	Sabrina Martz
WECC-0136	Platte River Power Authority	Transmission Owners	Yes	0	Matthew Thompson
WECC-0136	Platte River Power Authority	Electric Generators	Yes	0	Tyson Archie
WECC-0136	Public Service Company of Colorado (Xcel Energy)	Electric Generators	Yes	0	Gerry Huitt
WECC-0136	Public Service Company of Colorado (Xcel Energy)	Electricity Brokers, Aggregators, and Marketers	0	0	Carrie Simpson
WECC-0136	Public Service Company of New Mexico	Load-Serving Entities (LSEs)	0	0	Laurie Williams
WECC-0136	Public Service Company of New Mexico	Electricity Brokers, Aggregators, and Marketers	0	0	Laurie Williams

**Attachment N—Final Ballot Results**

WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes Misoperations (PSRAS) Request for Coordinated Retirement Date

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	Public Service Company of New Mexico	Transmission Owners	0	0	Laurie Williams
WECC-0136	Public Service Company of New Mexico	Electric Generators	0	0	Laurie Williams
WECC-0136	Sacramento Municipal Utility District	Electric Generators	Yes	0	Joe Tarantino
WECC-0136	Sacramento Municipal Utility District	Transmission Dependent Utilities (TDUs)	Yes	0	Joe Tarantino
WECC-0136	Sacramento Municipal Utility District	Transmission Owners	Yes	0	Joe Tarantino
WECC-0136	Sacramento Municipal Utility District	Load-Serving Entities (LSEs)	Yes	0	Joe Tarantino
WECC-0136	Sacramento Municipal Utility District	Electricity Brokers, Aggregators, and Marketers	Yes	0	Joe Tarantino
WECC-0136	Salt River Project	Electricity Brokers, Aggregators, and Marketers	Yes	0	Bobby Olsen
WECC-0136	Salt River Project	Load-Serving Entities (LSEs)	Yes	0	Robert Kondziolka
WECC-0136	Salt River Project	Electric Generators	Yes	0	Kevin Nielsen
WECC-0136	Seattle City Light	Transmission Dependent Utilities (TDUs)	Yes	0	Hao Li
WECC-0136	Seattle City Light	Transmission Owners	0	0	Tuan Tran

**Attachment N—Final Ballot Results**

WECC-0136 PRC-004-WECC-2 Protection Systems and Remedial Action Schemes Misoperations (PSRAS) Request for Coordinated Retirement Date

Title	Company	Sector	Vote	Comments	Created By
WECC-0136	Seattle City Light	Load-Serving Entities (LSEs)	0	0	Tuan Tran
WECC-0136	Seattle City Light	Electricity Brokers, Aggregators, and Marketers	0	0	Charles Freeman
WECC-0136	Tri-State Generation & Transmission - Reliability	Transmission Owners	Yes	0	Tracy Sliman
WECC-0136	Tri-State Generation & Transmission - Reliability	Load-Serving Entities (LSEs)	0	0	Janelle Gill
WECC-0136	Tucson Electric Power	Electric Generators	Yes	0	John Tolo
WECC-0136	Tucson Electric Power	Transmission Owners	Yes	0	John Tolo
WECC-0136	Tucson Electric Power	Load-Serving Entities (LSEs)	Yes	0	John Tolo
WECC-0136	US Bureau of Reclamation	Transmission Owners	0	0	Wendy Center
WECC-0136	US Bureau of Reclamation	Electric Generators	0	0	Wendy Center
WECC-0136	Western Area Power Administration	Transmission Owners	Yes	0	sean er

# Unofficial Comment Form

## Regional Reliability Standard

## Revised Retirement Date for PRC-004-WECC-2

**DO NOT** use this form for submitting comments. Use the [electronic form](#) to submit comments on the proposed revised retirement date for Regional Reliability Standard **PRC-004-WECC-2 – Protection System and Remedial Action Scheme Misoperation**. The electronic form must be submitted by **8 p.m. Eastern, Tuesday, January 22, 2019**.

Documents and information about this project are available on the [WECC's Standards Under Development](#) page. If you have questions, contact Reliability Standards Analyst, [Nasheema Santos](#) (via email) or at (404) 446-2564.

### Background Information

The NERC Board of Trustees approved the retirement of Regional Standard PRC-004-WECC-2 at its February 2018 meeting; the retirement is currently pending regulatory approval. WECC initially proposed to retire the regional standard effective upon regulatory approval. WECC is proposing a revised retirement date of January 1, 2021 to coordinate the retirement of the regional standard with the effective date of continent-wide Reliability Standard PRC-012-2.

The WECC Board of Trustees approved the revised retirement date for PRC-004-WECC-2 on December 6, 2018.

### NERC Criteria for Developing or Modifying a Regional Reliability Standard

Regional Reliability Standard shall be: (1) a regional reliability standard that is more stringent than the continent-wide reliability standard, including a regional standard that addresses matters that the continent-wide reliability standard does not; or (2) a regional reliability standard that is necessitated by a physical difference in the bulk power system. Regional reliability standards shall provide for as much uniformity as possible with reliability standards across the interconnected bulk power system of the North American continent. Regional reliability standards, when approved by FERC and applicable authorities in Mexico and Canada, shall be made part of the body of NERC reliability standards and shall be enforced upon all applicable bulk power system owners, operators, and users within the applicable area, regardless of membership in the region.

The approval process for a regional reliability standard requires NERC to publicly notice and request comment on the proposed standard. Comments shall be permitted only on the following criteria (technical aspects of the standard are vetted through the regional standards development process):

**Open** — Regional reliability standards shall provide that any person or entity that is directly and materially affected by the reliability of the bulk power system within the regional entity 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 regional entity, a regional entity or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.

**Inclusive** — Regional reliability standards 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** — Regional reliability standards 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** — Regional reliability standards shall provide for reasonable notice and opportunity for public comment. At a minimum, the standard shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent** — All actions material to the development of regional reliability standards shall be transparent. All standards development meetings shall be open and publicly noticed on the regional entity's Web site.

Review the revised retirement date for the Regional Reliability Standard and answer the following questions.

1. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the "Open" criteria as outlined above? If "No", please explain in the comment area below:  
 Yes  
 No  
Comments:
2. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the "Inclusive" criteria as outlined above? If "No", please explain in the comment area below:  
 Yes  
 No  
Comments:
3. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the "Balanced" criteria as outlined above? If "No", please explain in the comment area below:  
 Yes  
 No  
Comments:

4. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:

- Yes
- No

Comments:

5. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:

- Yes
- No

Comments:

## Consideration of Comments

**Project Name:** Regional Reliability Standard (WECC) | Revised Retirement Date of PRC-004-WECC-2

**Comment Period Start Date:** 12/7/2018

**Comment Period End Date:** 1/22/2019

**Associated Ballots:**

There were 6 sets of responses, including comments from approximately 10 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 development of the revised PRC-004-WECC-2 retirement effective date met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:](#)
- [2. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:](#)
- [3. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:](#)
- [4. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:](#)
- [5. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:](#)

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Portland General Electric Co.	Daniel Mason	1,3,5,6		PGE FCD	Ryan Olson	Portland General Electric Co.	5	WECC
					Nathaniel Clague	Portland General Electric Co.	1	WECC
					Angela Gaines	Portland General Electric Co.	3	WECC
					Daniel Mason	Portland General Electric	6	WECC

1. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:

Daniel Mason - Portland General Electric Co. - 1,3,5,6, Group Name PGE FCD

Answer No

Document Name

Comment

All five questions on this comment form reference criteria "above" which have not been provided on the comment form.

PGE does though support the retirement of PRC-004-WECC-2 and the revised retirement date to coordinate its retirement with the effective date of PRC-012-2.

Likes 0

Dislikes 0

**Response**

The WECC-0136 Drafting Team appreciates PGE’s observation regarding the “above” reference. The drafting team has forwarded your observation to NERC Standards personnel with a request to review the online form for greater clarity.

The “above” reference is language imported directly from the Word version of the NERC Comment Form. The Word version is located at the far-right column of each regional project posted for comment on NERC’s Regional Reliability Standards Under development page.<sup>1</sup> On that form, the user will find the criteria for: 1) open, 2) inclusive, 3) due process, 4) balanced, and 5) transparent.

<sup>1</sup> <https://www.nerc.com/pa/Stand/RegionalReliabilityStandardsUnderDevelopment.aspx>

<p>In the context of that criteria, the commenter can see that the 45-day comment period at NERC is designed to ensure that each region adhered to its standards development <u>processes</u>. Each process is designed to address substantive issue before the project is presented for NERC procedural review.</p>	
<p><b>Richard Jackson - U.S. Bureau of Reclamation - 1,5</b></p>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Extending the retirement effective date perpetuates a merely administrative burden. The additional tracking and reporting requirements mandated by PRC-004-WECC-2 result in expenditures of ratepayer funds. WECC ratepayers would be better served by honoring the original retirement date for this standard.</p>	
Likes	0
Dislikes	0
<p><b>Response</b></p>	
<p>The WECC-0136 drafting team appreciates the United States Bureau of Reclamation's (USBR) comment. Please refer to team's response to PGE, located above. During all stages of the WECC-0136 standard development process, WECC adhered to the WECC Reliability Standards Development Procedures that include, but are not limited to, procedural attributes to ensure: 1) openness, 2) inclusiveness, 3) due process, 4) balance, and 5) transparency.</p>	
<p><b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC</b></p>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>None</p>	
Likes	0

Dislikes	0
<b>Response</b>	
The drafting team appreciates Bonneville Power Administration's continued involvement in the standards development process.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates Black Hills Corporation's continued involvement in the standards development process.	
<b>Kevin Salsbury - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates NV Energy's continued involvement in the standards development process.	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6</b>	
<b>Answer</b>	Yes



<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates PacifiCorp's continued involvement in the standards development process.	

2. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:

<b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates Bonneville Power Administration’s continued involvement in the standards development process.	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp – 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates PacifiCorp’s continued involvement in the standards development process.	
<b>Kevin Salsbury - Berkshire Hathaway - NV Energy - 5</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates NV Energy's continued involvement in the standards development process.	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1,5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates the United States Bureau of Reclamation's continued involvement in the standards development process.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0

Dislikes 0

**Response**

The drafting team appreciates Black Hills Corporation's continued involvement in the standards development process.

<b>3. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:</b>	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1,5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>The lengthy extension of the proposed retirement date of PRC-004-WECC-2 does not meet the criteria for “balanced” because the proposal was driven by interests contrary to the original interests driving Project WECC-0126; i.e., reducing redundancy and administrative compliance burdens. The SDT did not place proper emphasis on the true impact of Project WECC-0136; i.e., the <b>continuation</b> of redundancies and administrative burdens for multiple additional years. Further, the detrimental nature of the continued redundant and administrative compliance burdens was minimized by the Drafting Team consisting solely of WECC Standards Department personnel, rather than involving industry representatives to fully acknowledge and assess the impacts of the delayed retirement on the industry.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>The WECC-0136 DT appreciates the United States Bureau of Reclamation’s (USBR) concerns. Please refer to the above responses provided to PGE and USBR.</p>	
<b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 – WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
None	

Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates Bonneville Power Administration's continued involvement in the standards development process.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates Black Hills Corporation's continued involvement in the standards development process.	
<b>Kevin Salsbury - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates NV Energy's continued involvement in the standards development process.	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates PacifiCorp's continued involvement in the standards development process.	

<p><b>4. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:</b></p>	
<p><b>Richard Jackson - U.S. Bureau of Reclamation - 1,5</b></p>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>The proposed lengthy extension of the retirement effective date does not meet the criteria for “due process.” The reliability concern for which the original standard was drafted is no longer relieved by the lengthy extension of the retirement date. Rather, extending the retirement date perpetuates the redundancies committed by the original standard and does not offer timely relief from administrative compliance burdens that do not improve BES reliability.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>The WECC-0136 DT appreciates the United States Bureau of Reclamation’s (USBR) concerns. Please refer to the above responses provided to PGE and USBR.</p>	
<p><b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 – WECC</b></p>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>None</p>	
Likes	0



Dislikes	0
<b>Response</b>	
The drafting team appreciates Bonneville Power Administration's continued involvement in the standards development process.	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates PacifiCorp's continued involvement in the standards development process.	
<b>Kevin Salsbury - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates NV Energy's continued involvement in the standards development process.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates Black Hills Corporation's continued involvement in the standards development process.	

<b>5. Do you agree the development of the revised PRC-004-WECC-2 retirement effective date met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:</b>	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1,5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	<p>The lengthy extension of the retirement date of this redundant and administrative standard was not transparently presented for industry review. The extensive emphasis on the “alignment of the retirement date” with the future effective date of PRC-012-2 distracted from the true impact of perpetuated compliance with redundant and administrative requirements.</p> <p>In general, Reclamation supports alignment throughout the nationwide and regional standards; however, the lack of industry interest in Posting 1 of Project WECC-0136 indicates a general misunderstanding of the proposal’s impact. Five entities commented in support of the WECC-0126 immediate retirement proposal, yet only one entity commented on the WECC-0136 alignment proposal to extend the retirement date. Rather than emphasizing lack of immediate relief from the redundancies and administrative burdens originally relieved by Project WECC-0126, the continued requirement for entities to comply with redundant and administrative requirements for additional years was presented as “alignment” under Project WECC-0136, thereby failing to draw proper negative attention from industry during previous substantive comment periods.</p>
Likes	0
Dislikes	0
<b>Response</b>	
The WECC-0136 DT appreciates the United States Bureau of Reclamation’s (USBR) concerns. Please refer to the above responses provided to PGE and USBR.	
<b>Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
The drafting team appreciates Bonneville Power Administration's continued involvement in the standards development process.	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
The drafting team appreciates Black Hills Corporation's continued involvement in the standards development process.	
<b>Kevin Salisbury - Berkshire Hathaway - NV Energy - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	

Dislikes	0
<b>Response</b>	
The drafting team appreciates NV Energy's continued involvement in the standards development process.	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
The drafting team appreciates PacifiCorp's continued involvement in the standards development process.	