

June 14, 2017

**VIA ELECTRONIC FILING**

Ms. Erica Hamilton, Commission Secretary  
British Columbia Utilities Commission  
Box 250, 900 Howe Street  
Sixth Floor  
Vancouver, B.C.  
V6Z 2N3

Re: *North American Electric Reliability Corporation*

Dear Ms. Hamilton:

The North American Electric Reliability Corporation hereby submits Notice of Filing of the North American Electric Reliability Corporation of Amendments to the Western Electricity Coordinating Council Regional Reliability Standards Development Procedures. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

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

**3353 Peachtree Road NE  
Suite 600, North Tower  
Atlanta, GA 30326  
404-446-2560 | [www.nerc.com](http://www.nerc.com)**

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**BEFORE THE  
BRITISH COLUMBIA UTILITIES COMMISSION  
OF THE PROVINCE OF BRITISH COLUMBIA**

**NORTH AMERICAN ELECTRIC )  
RELIABILITY CORPORATION )**

**NOTICE OF FILING OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION  
OF AMENDMENTS TO THE WESTERN ELECTRICITY COORDINATING COUNCIL  
REGIONAL RELIABILITY STANDARDS DEVELOPMENT PROCEDURES**

Shamai Elstein  
Senior Counsel  
Marisa Hecht  
Counsel  
North American Electric Reliability Corporation  
1325 G Street, N.W., Suite 600  
Washington, D.C. 20005  
(202) 400-3000  
shamai.elstein@nerc.net  
marisa.hecht@nerc.net

*Counsel for the North American Electric  
Reliability Corporation*

June 14, 2017

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I.	NOTICES AND COMMUNICATIONS.....	2
II.	PROPOSED AMENDMENTS TO THE WECC REGIONAL RELIABILITY STANDARDS DEVELOPMENT PROCEDURES.....	2
A.	WECC Standards Voting Segments.....	3
B.	Definitions.....	3
C.	Step 2 – Complete SAR and Present to the WECC Standards Committee.....	4
D.	Step 3 – Convene a Drafting Team.....	4
E.	Step 4 – Begin Drafting Phase and Submit Draft to WECC Standards Committee.....	4
F.	Step 5 – Post for Comment.....	5
G.	Step 6 – Respond to Comments, Treatment of Non-Substantive Changes.....	5
H.	Step 9 – Form the Ballot Pool and Ballot the Standard.....	5
I.	Step 10 – Initiate the Appeals Process – If Needed.....	6
J.	Step 13 – Retire a WECC Regional Criterion.....	6
K.	Step 14 – Submit a Request for Interpretation.....	6
L.	Field Tests.....	7
M.	Other Minor Changes.....	7
III.	WECC AND NERC APPROVALS FOR THE PROPOSED AMENDMENTS.....	7

**ATTACHMENTS**

ATTACHMENT 1: Amended Western Electricity Coordinating Council Regional Reliability Standards Development Procedures – Clean

ATTACHMENT 2: Amended Western Electricity Coordinating Council Regional Reliability Standards Development Procedures – Redline



comment, due process, openness, and balance of interests in developing Reliability Standards and are just, reasonable, not unduly discriminatory or preferential, and in the public interest.

The NERC Board of Trustees approved the amendments to the WECC Procedures on May 11, 2017. Attachments 1 and 2 to this Petition are clean and redlined versions, respectively, of the proposed amended WECC Procedures.

**I. NOTICES AND COMMUNICATIONS**

Notices and communications with respect to this filing may be addressed to the following:

Shamai Elstein  
Senior Counsel  
Marisa Hecht  
Counsel  
North American Electric Reliability Corporation  
1325 G Street, N.W., Suite 600  
Washington, D.C. 20005  
(202) 400-3000  
shamai.elstein@nerc.net  
marisa.hecht@nerc.net

**II. PROPOSED AMENDMENTS TO THE WECC REGIONAL RELIABILITY STANDARDS DEVELOPMENT PROCEDURES**

The WECC Standards Committee (“WSC”) determined that a review of the WECC Procedures was needed because of changes in the NERC Compliance Registry that occurred in 2015. The WSC initiated a project to review the entire WECC Procedures in addition to addressing any revisions as a result of the NERC Compliance Registry changes. The proposed revisions, described in more detail below, align the WECC voting sectors with the NERC voting segments by incorporating applicable portions of the NERC Rules of Procedure by reference. The proposed revisions also align certain WECC processes with NERC processes. This synchronization provides a benefit to industry by increasing consistency in development of Reliability Standards, both continent-wide and regional. In addition, proposed revisions include streamlined processes, clarified treatment of SARs, a new section on field tests, and other clarifications. These proposed

revisions and clarifications allow WECC to more efficiently develop RRSs while maintaining the integrity and quality of the procedures and RRSs.

This section is organized by the titles of the revised sections of the WECC Procedures that are proposed. These changes, as well as minor proposed clarifications not highlighted below, are shown in Attachment 2 hereto.

#### **A. WECC Standards Voting Segments**

The proposed revisions align the WECC Standards Voting Segments with the NERC Registered Ballot Body. In 2015, NERC eliminated the Purchasing-Selling Entity and the Load-Serving Entity from the NERC Compliance Registry.<sup>2</sup> Under the current WECC Procedures, Standards Voting Sectors are based on the NERC Compliance Registry. As a result of the change to Purchasing-Selling Entity and Load-Serving Entity, the current Sector 3 Marketer/Broker is no longer a valid sector. The WSC revised the WECC Procedures to state that WECC's Standards Voting Segments are the same as those established in Appendix 3D – Registered Ballot Body Criteria of the NERC Rules of Procedure.<sup>3</sup> The proposed revision helps ensure alignment between NERC and WECC procedures going forward.

#### **B. Definitions**

Definitions in the following documents have been incorporated by reference: (i) *NERC Glossary of Terms Used in Reliability Standards*; (ii) WECC Bylaws; and (iii) NERC Rules of Procedure. The following definitions have been substantially altered or deleted: (i) Ballot Body; (ii) Day; (iii) Electricity Line of Business; (iv) Other Projects (in favor of CRT); (v) Non-

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<sup>2</sup> See the Federal Energy Regulatory Commission's *Order on Electric Reliability Organization Risk Based Registration Initiative and Requiring Compliance Filing*, 150 FERC ¶ 61,213 (2015) (approved elimination of Purchasing-Selling Entity); *Order on Compliance Filing*, 153 FERC ¶ 61,024 (2015) (approved elimination of Load-Serving Entity).

<sup>3</sup> Appendix 3D of the NERC Rules of Procedure is available at [http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix\\_3D\\_BallotBodyCriteria\\_20140701\\_updated\\_20131004.pdf](http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_3D_BallotBodyCriteria_20140701_updated_20131004.pdf).

Substantive Changes; (vi) Participating Stakeholders; (vii) Regional Reliability Standard; and (viii) Substantive Changes. The proposed revisions to the Definitions eliminate confusion, remove terms no longer applicable, align more with NERC terms, and allow reference to other documents to increase consistency in use of terms.

**C. Step 2 – Complete SAR and Present to the WECC Standards Committee**

The time window for the WSC to approve a SAR after receipt has been extended from 60 to 90 days. The additional time allows the WSC opportunity for a thorough review to determine whether the SAR is within the scope of WECC’s authority and is appropriate for development. In addition, the extension allows more time for stakeholders to comment on the SAR and for WECC to consider these comments at a public WSC meeting.

**D. Step 3 – Convene a Drafting Team**

The current WECC Procedures are silent on when the WSC could revise the scope of a SAR. The proposed revisions clarify that the WSC can address the scope of a SAR at any point during development. The time window for the WSC to approve a Drafting Team (“DT”) after establishing a starting date for the project has been extended from 60 to 120 days. The proposed extension permits better allocation and management of resources. The WSC can continue its quarterly meeting schedule and take additional time, if needed, to discuss projects before allocating the limited subject matter expertise available to a drafting effort.

**E. Step 4 – Begin Drafting Phase and Submit Draft to WECC Standards Committee**

WECC, its committees, and its subgroups have been explicitly excluded from the Applicability section of both RRSs and WECC CRTs to avoid conflicts of interest. In addition, the Applicability section of a RRS is limited to functions in the NERC Compliance Registry.

**F. Step 5 – Post for Comment**

The initial 45-day posting period has been streamlined to 30 days. WECC staff observed that a majority of all comments are received within 72 hours of closing, regardless of the duration of the posting window. Therefore, the proposed 30-day posting period aligns with iterative posting period timeframes and allows WECC to progress on projects while collecting the same input. In addition, the proposed revisions clarify that Interpretations do not require an Implementation Plan, which is similar to the NERC interpretation process. The closing hour of posting has been extended from 5:00 p.m. to 6:00 p.m. Mountain. The extended closing hour accommodates commenters in the Pacific time zone so that they may submit comments until 5 p.m. Pacific.

**G. Step 6 – Respond to Comments, Treatment of Non-Substantive Changes**

The proposed revisions align with the NERC process regarding consideration of comments and provide that a DT does not need to respond to the same comment in iterative postings if the comment was previously addressed. This proposed change streamlines the standards development process by allowing the DT to focus on responding to new issues. In addition, the proposed revisions clarify how the DT and WSC handle non-substantive changes to RRSs and WECC CRT, including after a WECC ballot window opens. In the proposed revisions, a DT would address non-substantive changes through a process similar to the NERC process.

**H. Step 9 – Form the Ballot Pool and Ballot the Standard**

A stipulation has been added requiring that an application to join the Ballot Body must precede a Ballot Pool by no less than five days. This proposed change provides time for appropriate vetting of applicants desiring to join the Ballot Body. The proposed revisions clarify that once the Ballot Pool approves a project, the WSC is obligated to forward the project to the WECC Board of Directors; however, the WSC is not obligated to recommend approval of the



project. The proposed revisions also state explicitly that additional Standards Briefings<sup>4</sup> are allowed. The approval percentage for WECC RRSs and CRT has been changed from a simple majority to a two-thirds affirmative fractional majority, which aligns with the NERC majority for approval of a Reliability Standard. Finally, the Director of Standard's discretion has been broadened regarding late entrance into a Ballot Pool.

**I. Step 10 – Initiate the Appeals Process – If Needed**

The entire appeals process has been redrafted for clarity and to streamline the standards development process. Under the proposed revisions, any person may appeal an alleged non-adherence to any provision of the WECC Procedures. The request for appeal must be submitted within 10 days after the grounds for the alleged appeal arise. The window for appeals has been shortened from 30 days to 10 days. This shortened time period for appeals provides for prompt resolution of procedural disputes and a more expeditious Regional Reliability Standards development process while preserving due process.

**J. Step 13 – Retire a WECC Regional Criterion**

A 14-day notice period has been added as a precursor to retirement of a WECC CRT when based on a finding of redundancy. The proposed notice period provides an opportunity for subject matter experts to review the potential retirement prior to discussion at a WSC meeting.

**K. Step 14 – Submit a Request for Interpretation**

The Interpretation section has been redrafted to effectively mirror that of the NERC interpretation process, which is Section 7.0: Process for Developing an Interpretation, Appendix

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<sup>4</sup> The Definitions section of the WECC Reliability Standards Development Procedures defines Standards Briefings as follows: “Any meeting initiated by WECC for the purpose of creating an open forum for discussion and explanation of an RRS or CRT; generally, but not exclusively, held during the development process of those documents in advance of a ballot window.”

3A – Standard Processes Manual of the NERC Rules of Procedure.<sup>5</sup> In addition to aligning with the NERC process, the proposed revisions provide more detail on valid requests for interpretations.

#### **L. Field Tests**

A new section for Field Tests has been added. The WECC process for field tests is similar to the process in Section 6.0: Processes for Conducting Field Tests and Collecting and Analyzing Data, Appendix 3A – Standard Processes Manual of the NERC Rules of Procedure. Field tests can provide valuable input to the standards development process because DTs can incorporate lessons learned from field implementation of proposed Reliability Standards.

#### **M. Other Minor Changes**

Notice of DT meetings and Standards Briefings and the default window for balloting have been shortened from 15 days to 14 days. The shortened time period allows for DTs to schedule meetings on consistent days of the week while providing notice. In addition, the proposed revisions to the Standards Briefings notice period and default balloting window maintain consistency of time periods in the Procedures.

### **III. WECC AND NERC APPROVALS FOR THE PROPOSED AMENDMENTS**

After consideration of comments received from public postings of the proposed changes,<sup>6</sup> the revised WECC Procedures were approved by the WSC on December 6, 2016 in accordance with WECC's process and were subsequently approved by the WECC Board of Directors on March 8, 2017. The revised WECC Procedures were posted on the NERC website for a 45-day public comment period from March 17, 2017 through May 1, 2017. One set of supportive

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<sup>5</sup> Appendix 3A of the NERC Rules of Procedure is available at [http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix\\_3A\\_StandardProcessesManual\\_20130626.pdf](http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_3A_StandardProcessesManual_20130626.pdf).

<sup>6</sup> Proposed revisions to the WECC Regional Reliability Standards Development Procedures were posted for four public comment periods on the following dates: December 8, 2015 through January 25, 2016; February 8 through February 29, 2016; June 27 through August 1, 2016; and September 13 through October 14, 2016.

responses was received. The NERC Board of Trustees approved the amendments to the WECC Procedures on May 11, 2017.

Respectfully submitted,

/s/ Marisa Hecht

Shamai Elstein  
Senior Counsel  
Marisa Hecht  
Counsel  
North American Electric Reliability Corporation  
1325 G Street, N.W., Suite 600  
Washington, D.C. 20005  
(202) 400-3000  
shamai.elstein@nerc.net  
marisa.hecht@nerc.net

*Counsel for the North American Electric  
Reliability Corporation*

Date: June 14, 2017

# **ATTACHMENT 1**

Amended Western Electricity Coordinating Council Regional Reliability

Standards Development Procedures – Clean

# Reliability Standards Development Procedures

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WECC Standards Department  
WECC Standards Committee  
Revised: March 2017



155 North 400 West, Suite 200  
Salt Lake City, Utah 84103-1114

## Introduction

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The Western Electricity Coordinating Council (WECC) is a Regional Entity authorized through a delegation agreement between the North American Electricity Reliability Corporation (NERC) and WECC pursuant to Section 215 of the Federal Power Act. NERC delegates designated powers, rights, and responsibilities to WECC regarding the administration within the Western Interconnection of electric Reliability Standards adopted or approved by NERC and the Federal Energy Regulatory Commission (FERC).<sup>1</sup>

These Reliability Standards Development Procedures (Procedures) define the process to be used by WECC for the development, modification, retirement, and interpretation of Regional Reliability Standards (RRS) and WECC Regional Criteria (CRT).

These Procedures establish an open and transparent process for the development of WECC RRSs and CRTs. These Procedures include, but are not limited to, public notice of intent to develop RRSs and CRTs, a public comment period on the proposed documents, due consideration of comments provided, and a balanced Ballot Body.

The Procedures shall be interpreted and applied in a manner that is consistent with the WECC Bylaws. Should any conflict arise between the Procedures and the WECC Bylaws, the WECC Bylaws will prevail.

## Definitions

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### Ballot Body

That body of qualified persons that register with WECC for participation in Ballot Pools.

### Ballot Pool

That pool of Ballot Body entities that have registered to vote on a specific document.

### Drafting Team (DT)

A team of pertinent subject-matter experts (SME) appointed by the WECC Standards Committee (WSC) to develop the document(s) called for in a Standard Authorization Request (SAR), consider and respond to industry comments, participate in forums to help build consensus on draft documents, and to perform other tasks as assigned by the WECC Standards Committee (WSC).

### NERC Compliance Registry

Registry of the Bulk Electric System owners, operators, and users that are subject to approved reliability standards.

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<sup>1</sup> Unless otherwise specified, capitalized terms are defined in the NERC Glossary of Terms Used in Reliability Standards.

**Non-Substantive Changes**

Revisions that do not change the scope, applicability, or intent of any requirement, including but not limited to, correcting the numbering of a requirement, correcting references, changes to document styles and templates, correcting the spelling of a word, adding an obviously missing word, or rephrasing a requirement for improved clarity.

**Regional Criteria (CRT)**

As defined in the NERC Rules of Procedure.

**Regional Reliability Standard (RRS)**

As defined in the NERC Rules of Procedure.

**Standard Authorization Request (SAR)**

The WECC form titled Standard Authorization Request (SAR) administered by the WECC Standards Department for the purpose of requesting development, modification, retirement, interpretation, or other disposition of an RRS or CRT.

**Standards Briefing**

Any meeting initiated by WECC for the purpose of creating an open forum for discussion and explanation of an RRS or CRT; generally, but not exclusively, held during the development process of those documents in advance of a ballot window.

**Standards Email List (SEL)**

Email list(s) established and maintained by WECC for the purpose of communicating due process activity; generally, but not exclusively, for standards-related activities.

**Substantive Changes**

A Substantive Change is one that changes the scope, applicability, required actions, or intent of the document.

**WECC Standards Committee (WSC)**

The committee established by the WECC Board of Directors (Board) for the purpose of overseeing the implementation of these Procedures pursuant to its Board-approved charter.

**Overview**

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This document has two primary sections. The first section describes the steps to be taken during development of an RRS or CRT, absent exceptional circumstances. The second section augments the first with Supporting Processes to address exceptions such as an expedited process for urgent actions, addressing regulatory directives, and maintenance of certain documents.

## Development Steps

The following steps are included in the development of an RRS or CRT, absent exceptional circumstances. Click on any item below to display details on how to complete the step.

- Step 1 – Submit and Validate a Standard Authorization Request ..... 6
- Step 2 – Complete SAR and Present to the WSC ..... 6
- Step 3 – Convene the Drafting Team ..... 7
- Step 4 –Begin Drafting Phase and Submit Draft to WSC..... 8
- Step 5 – Post for Comment ..... 9
- Step 6 – Respond to Comments ..... 10
- Step 7 – Submit Proposed Draft to the WSC with a Request for Ballot..... 12
- Step 8 – Convene a Standards Briefing ..... 12
- Step 9 – Form the Ballot Pool and Ballot the Standard ..... 13
- Step 10 – Initiate the Appeals Process – If Needed ..... 15
- Step 11 – Obtain Board Approval..... 15
- Step 12 – Submit for NERC and FERC Approval and Implementation ..... 15
- Step 13 – Retire a CRT ..... 16
- Step 14 – Submit a Request for Interpretation ..... 16

The following related processes are included in the Supporting Processes section:

- Expedited Process for Urgent Action
- Regulatory Directives
- Maintenance of the Procedures
- Maintenance of RRSs and CRTs
- Field Tests



## Notices and Counting of Days

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Notices required under these Procedures shall be distributed electronically via WECC's SEL(s) and deemed delivered when dispatched.

Concurrent running of notice and posting periods is explicitly allowed.

WECC shall provide notice to NERC of all standards-related activities by including NERC on WECC's SEL. Inclusion of a NERC-provided email address on the related SEL shall constitute coordination of notice to NERC of standards-related activities and shall be deemed delivered when dispatched via the SEL(s).

Any person may receive notices provided via the SEL.

All references to days are calendar days. When counting the number of days, the count shall exclude the first day of the time window to be measured. If a terminus date falls on a weekend or a day that WECC is scheduled to be closed, the new terminus date shall be the day following the weekend or WECC closure day.

For example, if a 14-day period ends on a holiday then the terminus date is on the following WECC business day.

## WECC Standards Committee

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The WSC manages these Procedures. The WSC protects the integrity, credibility and implementation of the Procedures while acting in accordance with the WSC Charter. Delineation of specific WSC duties, WSC composition and governance, WSC voting privileges, and other related practices, is included in the WSC Charter, as approved by the Board.

## WECC Standards Voting Segments

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WECC's Standards Voting Segment (SVS) shall be the same as those established by NERC.<sup>2</sup> A qualifying entity may register and cast a ballot in any SVS(s) for which it qualifies.

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<sup>2</sup> NERC currently establishes its SVS in the NERC Rules of Procedure, Appendix 3D – Development of the Registered Ballot Body. If the SVSs contained in that appendix or its successor should vary from time to time it is the intent of these Procedures that WECC's SVS will mirror those of NERC without requiring further change to the Procedures to accommodate those changes.

## Process for Development of Regional Reliability Standards, Regional Criteria, and Interpretations

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### Step 1 – Submit and Validate a Standard Authorization Request

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Development, revision, retirement, or interpretation of an RRS or CRT shall be initiated by the filing of a Standard Authorization Request (SAR) by any person or entity. A SAR is filed by completing the electronic fields of the online WECC SAR form. WECC staff shall review the incoming SAR to ensure it is valid.<sup>3</sup> Once deemed valid, the SAR shall be posted on the WECC website and notification shall be sent to the SEL.

### Step 2 – Complete SAR and Present to the WSC

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WECC staff shall assign a unique tracking number to each SAR. The unique tracking number shall be used to identify the SAR throughout the development and archival processes. The SAR and those documents developed in response to the SAR shall be publicly accessible on the WECC website throughout the development process. WECC staff shall determine within 30 days of receiving a SAR whether it is complete. WECC staff may assist with completing the SAR, or report to the WSC that it is incomplete and request guidance.

To be deemed complete, each SAR shall contain a description of the proposed RRS or CRT subject matter sufficiently detailed to define the purpose, scope, impacted parties, requirements, and any other information relevant to the proposed RRS or CRT. Once WECC staff agrees it is complete, WECC staff shall place the SAR on the agenda for the next scheduled WSC meeting for disposition, subject to required notice. Notice of WSC meetings and posting of WSC agendas will be provided in accordance with the WSC Charter.

The WSC shall determine whether the SAR is within the scope of WECC's authority and activities, and is appropriate for development. Public comment on the SAR will be reviewed and considered by the WSC during a duly noticed WSC meeting prior to the WSC approving the SAR.

The WSC shall make the above determination within 90 days of the date that the SAR is received by WECC, except where the SAR has been remanded, in which case the WSC shall make that determination within 30 days of receiving the curative SAR.

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<sup>3</sup> A "valid" SAR is different than a "complete" SAR. A SAR is deemed valid by staff as a threshold review that filters out spam and unwanted nuisance documents that may be received via an open website portal. Whether a SAR is "complete" is addressed in Step 2.

The WSC shall ensure that the SAR provides enough information that a Drafting Team (DT) will have a clear understanding of the reasons for, and nature of, the RRS or CRT to be developed. The SAR author may be asked to further assist in the development or clarification of the SAR.

The WSC may accept the SAR, in which case development proceeds to Step 3.

The WSC may remand a SAR if it determines the content of the SAR is deficient. If the SAR is deemed deficient, the WSC shall specify the deficiency identified in the SAR and suggest potential remedies as part of its remand. WECC staff will make reasonable efforts to assist the SAR author in addressing the deficiencies identified by the WSC.

The SAR author shall have 30 days from the date of remand or until the 60th day following submittal of the SAR, whichever is longer, to remedy each deficiency identified in the remand, or withdraw the SAR.

If the deficiencies are remedied, WECC staff will resubmit the SAR to the WSC for disposition. If the deficiencies are not remedied within the allotted period: 1) the SAR will be deemed incomplete, 2) no further developmental action will be taken on the SAR, and 3) the SAR will be archived. The SAR author may submit a new SAR without prejudice based on the same or similar fact pattern.

The WSC may reject a SAR if it determines the SAR is outside the scope of WECC's authority or is not appropriate to be undertaken by WECC. If a SAR is rejected, the WSC shall post its explanation for rejection on the WECC website. Notification of the WSC's decision shall:

- 1) be communicated to the SAR author, the Board, and the SEL,
- 2) reference the unique SAR tracking number and direct the recipient to supporting information as appropriate, and
- 3) be made no more than 30 days from the date of the WSC's determination.

The WSC's decision to reject a SAR may be appealed to the Board.

### **Step 3 – Convene the Drafting Team**

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If it accepts a SAR, the WSC may, at its discretion, expand or narrow the scope of the SAR at any time during the development process prior to approving the project for ballot. The WSC shall prioritize the development of the SAR in relation to other RRSs or CRTs proposed for development under the Procedures, as may be required based on the volume of requests and available resources. If prioritization dictates a postponed starting date, the WSC shall either set a postponed starting date or set a review date at which the WSC shall re-evaluate the SAR for purposes of its progress through these Procedures. In no case shall the review date be more than 180 days after the date the SAR was received.

Upon establishing a start date for the development of an RRS or CRT, the WSC shall convene a DT to develop the RRS or CRT required by the SAR. The WSC may either directly assign a DT or solicit team member nominations from the industry. The WSC shall approve the DT membership within 120 days of establishing a start date. The WSC may augment, modify, or replace DT membership at any time as needed.

Because the DT chair's primary responsibility is leadership and coordination, the DT chair need not be a SME in the field associated with the SAR.

Names of DT members will be posted on the WECC website.

#### **Step 4 –Begin Drafting Phase and Submit Draft to WSC**

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All DT meetings shall be open and publicly noticed on the WECC website.

The DT will begin working on the documents required by the SAR following assignment by the WSC. Notice of each DT meeting shall be dispatched via the SEL a minimum of 14 days prior to the meeting.

The author of the SAR may participate in the drafting process. The author of the SAR may be asked to provide additional information, supporting studies, and other information to support the requirements of the proposed RRS or CRT.

An RRS shall include those sections mandated by NERC, such as an applicability section, effective date, mandatory requirements, affected time horizons, measures, compliance, violation risk factors (VRF), and violation severity levels (VSL).

Each RRS shall promote at least one reliability principle and be consistent with all reliability principles and NERC market interface principles. Each RRS shall provide for as much uniformity as possible with Reliability Standards across the interconnected Bulk-Power System of the North American continent.

An RRS shall either:

- 1) be more stringent than a continent-wide reliability standard,
- 2) include a regional difference that addresses matters that the continent-wide reliability standard does not; or
- 3) be a regional difference necessitated by a physical difference in the Bulk-Power System.

An RRS or CRT may include a guidance section, background section, or other narrative sections; however, these sections are not required. Incorporation of extrinsic documents into an RRS or CRT should be avoided.

An RRS or CRT may include new definitions of terms that need to be added to the NERC or WECC glossary, respectively. Wherever possible, DTs are encouraged to use existing defined terms rather than create new defined terms.

In drafting the applicability section of an RRS, only functions in the NERC Compliance Registry will be used.

To avoid conflict of interest WECC, and its committees and subgroups, shall not be listed as the applicable entity in an RRS or CRT.

In the course of its assignment, the DT shall, at a minimum:

- review any preliminary technical assessment provided with the SAR;
- perform or request additional technical studies deemed necessary either by the DT or at the direction of the WSC;
- prepare supporting documents to support the RRS or CRT as needed; and
- request additional time from the WSC to develop the RRS or CRT, if necessary.

### **Step 5 – Post for Comment**

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On completion of each iterative draft of the RRS or CRT, WECC staff shall facilitate the posting of the draft RRS or CRT on the WECC website, along with supporting documents, if any, for a comment period of no less than 30 days for each posting, except as allowed in the Expedited Process for Urgent Action section of these Procedures.

An implementation plan shall be included in at least one iterative posting during the development of the RRS or CRT and shall be a part of the final record for consideration prior to ballot. (Interpretations do not require an implementation plan.)

A notice that the comment period has opened shall be distributed via the SEL. The notice shall include, at a minimum, the following information:

- identification of the RRS or CRT;
- what action is being taken (e.g., request for comment);
- the location of the document for review;
- how to submit comments or perform the requested action; and
- the opening and closing dates during which the solicited action shall take place. Unless otherwise posted, all posting periods close at 6:00 p.m. (Mountain).

WECC shall open a web portal to serve as the sole means of receiving comments on the RRS or CRT. Comments received via other media or received outside of the posted comment period will be accepted at the discretion of the DT. Comments may be submitted by any individual or entity, or a group of parties with a common comment.

To streamline the process, if a group of parties elects to submit a common comment, those parties are encouraged to submit that common comment only once and append to the comment the names of all those individuals, entities, or groups that are in support of the common position. DTs shall give due weight to such a joint comment.

The WSC shall monitor each posting and review the posted documents to ensure that the RRS or CRT:

- 1) remains within the scope of the SAR;
- 2) continues to be appropriate for development; and
- 3) meets any regulatory or policy-related directive including, but not limited to, adherence to these Procedures.

On a finding by a majority of the WSC members that the RRS or CRT does not meet one or more of the above three criteria, the WSC may:

- 1) adjust the scope of the SAR;
- 2) remand the work product to the DT with specific remedial direction;
- 3) exercise its right to augment, modify, or replace any or all of the DT members; or
- 4) exercise any combination of the above.

The WSC's rights and obligations specified in Step 5 terminate once a Ballot Pool is opened. The WSC retains the right to recommend that the Board not approve a specific RRS or CRT even though the project may subsequently be approved by the Ballot Pool.

### **Step 6 – Respond to Comments**

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The DT shall consider all comments submitted in accordance with these Procedures. If the same comment is provided more than once in a single posting, the DT may provide a single response to all comments that raise the same or a similar concern. If the same comment is received in iterative postings, the DT is not obligated to respond to comments previously addressed.

The DT shall prepare a response to comments received that includes reporting the changes made to the proposed RRS or CRT as a result of comments received, if any. The DT shall also report on comments that were rejected by the DT, in whole or in part, and the reason(s) the comments were rejected. The response to comments will be posted on the WECC website no later than the next posting of the proposed RRS or CRT.

The DT should target posting its responses to the WECC website no later than 30 days after the comment window has closed. If more than 30 days are required, the DT chair or WECC Staff should advise the WSC chair of the DT's progress and request additional assistance if needed.

All parties submitting comments are encouraged to participate in the DT meetings during which responses to their comments are considered and drafted.

## **Treatment of Substantive Changes**

All Substantive changes to an RRS or CRT require at least one posting / comment / response cycle.

If the DT determines that comments received during any posting warrant a Substantive Change to the language of an RRS or CRT, the DT shall consider each comment and redraft the RRS or CRT accordingly, repeating the posting / comment / response cycle as many times as needed to address Substantive Changes while staying within the scope of the SAR.

If at any time during the development process the DT determines that the scope of the SAR should be adjusted, the DT shall present that request to the WSC for disposition.

If at any time during the development process the DT determines that it has reached a developmental impasse, the DT shall present the issue to the WSC for disposition.

If comments received during any posting do not warrant a Substantive Change to the language of an RRS or CRT, the DT shall be polled at a regularly scheduled and announced DT meeting and asked whether the RRS or CRT should be forwarded to the WSC with a recommendation to ballot the document. If the DT affirms by a majority vote of those present that the RRS or CRT should be forwarded to the WSC with a recommendation for ballot, the document will be forwarded accordingly.

## **Treatment of Non-Substantive Changes**

Non-Substantive Changes do not require a posting / comment / response cycle.

Non-Substantive errors discovered prior to the opening of a WECC ballot on either an RRS or a CRT may be corrected by the WSC.

### **Regional Reliability Standards**

If a Non-Substantive Change to an RRS is required at any time after a WECC ballot window opens, the proposed change shall be presented to the WSC with a request for approval. If the WSC agrees that the correction of the error does not change the scope or intent of the associated RRS, and agrees that the correction has no material impact on the applicable entities, then the correction shall be filed for approval with NERC and applicable governmental authorities as appropriate.

### **WECC Regional Criteria**

If a Non-Substantive Change to a CRT is required at any time after a WECC ballot window opens, the proposed change shall be presented to the WSC with a request for approval. If the WSC agrees that the correction of the error does not change the scope or intent of the associated CRT, and agrees that the correction has no material impact on the applicable entities, the WSC shall approve the change and instruct WECC staff to make the change. No further action is required.

Changes to document styles and templates as adopted by WECC for CRTs and NERC for RRSs are explicitly within the purview of staff and do not require further approval.

## Step 7 – Submit Proposed Draft to the WSC with a Request for Ballot

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On completion, the DT shall present the proposed RRS or CRT to the WSC during a duly noticed WSC meeting with a request for balloting by a WECC Ballot Pool. The WSC shall address that request no later than its next duly noticed meeting.

After receiving a request for ballot, the WSC shall review the final draft of the RRS or CRT as presented and determine whether it fulfills the requirements stated in the SAR. The WSC shall also consider whether extrinsic requirements, such as FERC orders, Board directives, or other regulatory directives are met by the content of the document.

If the WSC concludes that the proposed RRS or CRT is ready for ballot, the WSC shall forward the draft document to WECC staff with a request that a Ballot Pool be formed from the Ballot Body, for the specific intent of seeking approval of the document.

The results of the WSC's vote to forward the RRS or CRT to the Ballot Pool shall be documented. Any WSC member that opposes submittal of the RRS or CRT will be encouraged to provide dissenting comments and, if possible, specific language that would make the document acceptable to the dissenting member. If the WSC cannot reach agreement to submit the draft document to the Ballot Pool, the WSC will report to and seek guidance from the Board.

If the WSC concludes that the proposed RRS or CRT is not ready for ballot because it does not fulfill the requirements of the SAR or because it fails to meet other regulatory requirements or directives, the WSC shall remand the RRS or CRT to the DT with a specific explanation identifying the deficiencies that must be remedied.

Upon receiving the remanded RRS or CRT and explanation of deficiencies, the DT shall:

- 1) Redraft the RRS or CRT accordingly;
- 2) Initiate iterative comment / response cycles as needed until it again concludes that no further Substantive Changes are needed; and
- 3) Return the proposed RRS or CRT to the WSC for disposition.

## Step 8 – Convene a Standards Briefing

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Once the WSC approves submitting the RRS or CRT to the Ballot Pool, WECC shall dispatch notice to the SEL that a Standards Briefing will be held to discuss the content of the proposed RRS or CRT prior to balloting. Notice shall be provided 14 days or more before the Standards Briefing is to be held and shall provide, at a minimum, the following:

- 1) Identification of the RRS or CRT;
- 2) The time and place of the Standards Briefing; and
- 3) The WECC website location of the proposed RRS or CRT and related documentation for review.



## Step 9 – Form the Ballot Pool and Ballot the Standard

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Any individual or entity seeking participation in the Ballot Pool of an RRS or CRT shall first apply to WECC for Ballot Body membership in any SVS in which it is eligible. WECC staff shall review the request and confirm eligibility to join the Ballot Body. Prior to confirmation of eligibility the application is considered pending. While an application is pending, the applicant cannot join a Ballot Pool. Applications received less than five days prior to the opening of a Ballot Pool may not be considered for inclusion in that Ballot Pool.<sup>4</sup> Decisions of staff to deny the admission of an individual or entity to an SVS may be appealed in accordance Step 10 of these Procedures.

WECC staff shall require Ballot Body members to identify their Affiliates (as defined in the WECC Bylaws) who are also Ballot Body members. Affiliates within a single SVS may only have one vote in that SVS. Affiliates within a single SVS must designate a single Affiliate as the group's Ballot Pool member to vote in that SVS.

From the Ballot Body, a discrete Ballot Pool will be formed for each RRS or CRT to be balloted under these Procedures. All members of the Ballot Body shall be provided an opportunity to opt into a Ballot Pool formed for purposes of voting on each RRS or CRT. Once a Ballot Pool is established, an entity shall not be allowed to change the SVS(s) in which it has registered until balloting of the associated project has concluded. It is the Ballot Pool that votes on RRSs and CRTs developed under these Procedures.

Notice that a Ballot Pool is forming will be dispatched via the SEL and posted to the WECC website. That notice shall contain, at a minimum, the following information:

- 1) Identification of the RRS or CRT;
- 2) The proposed action to be taken (e.g., Notice of Ballot Pool Formation / Notice of Ballot);
- 3) When the Ballot Pool will open;
- 4) When the ballot will take place;
- 5) How to cast a vote; and
- 6) The WECC website location of the proposed RRS or CRT and related documents for review.

The Ballot Pool registration window shall remain open for a period determined by WECC staff, but in no case shall the Ballot Pool registration window be open less than 14 days or more than 60 days.

Once notice of a Ballot Pool forming has been dispatched, the ballot window shall commence no sooner than 14 days and no later than 45 days after that dispatch.

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<sup>4</sup> This period allows for review, confirmation, information technology functions, and the potentiality of holidays.

Once the ballot window opens, no Ballot Body member may join or withdraw from the Ballot Pool. The WECC Director of Standards has sole discretion to authorize deviations from this rule for good cause shown. Voting on an RRS or CRT shall be via electronic voting administered on the WECC website. The default voting window shall be a period of 14 days; however, the window may remain open up to a maximum of 60 days to reach a quorum. Additional Standards Briefings may be held as needed.

Eligible members of the Ballot Pool may cast one vote in each SVS for which they are eligible.

Negative votes will not be counted unless accompanied by a narrative explaining the reason for the negative vote. The statement should include language that would make the RRS or CRT acceptable. The statement will be included in the voting record for consideration by the WSC and the Board.

A two-thirds quorum of the Ballot Pool is required for each vote. Abstentions and negative votes cast without an explanation shall not be counted for the purpose of determining consensus, but will be counted for purposes of obtaining a quorum.

A weighted two-thirds affirmative fractional majority vote of the Ballot Pool is required for an RRS or CRT to be approved. Voting among the SVSs shall be weighted as follows:

For each SVS with 10 or more voters, the number of affirmative votes cast shall be divided by the sum of the affirmative votes plus the negative votes cast to determine the fractional affirmative vote for that SVS.

For each SVS with less than 10 voters, the same process shall be used to determine the fractional affirmative vote, but the fractional affirmative vote of that SVS shall be multiplied by 10 percent times the number of voters.

For example, for SVSs with nine voters, the fractional affirmative vote will be multiplied by 90 percent.

The sum of the fractional affirmative votes from all SVSs divided by the weighted number of SVSs voting shall be used to determine if a weighted two-thirds affirmative fractional majority vote has been achieved and whether the RRS or CRT has been approved. An SVS shall be considered as voting if any member of the SVS in the Ballot Pool casts either an affirmative or a negative vote. An RRS or CRT shall be deemed approved by the Ballot Pool if the sum of fractional affirmative votes from all SVSs divided by the weighted number of voting SVSs is a two-thirds affirmative fractional majority.

After a vote by the Ballot Pool, the WSC shall take one of the following actions.

If the Ballot Pool approves an RRS or CRT, the WSC shall submit the RRS or CRT to the Board with a request for disposition.

If the Ballot Pool rejects the RRS or CRT, the SAR shall be deemed complete and all associated documents shall be archived, except as allowed in the Regulatory Directive section of these Procedures.

### **Step 10 – Initiate the Appeals Process – If Needed**

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Any person may appeal the alleged non-adherence to any provision of these Procedures. The request for appeal, along with an explanation of the alleged grounds for appeal, must be submitted to the Director of Standards no later than 10 days after the alleged grounds for appeal arise. If the 10<sup>th</sup> day is not a WECC business day, the appeal must be submitted no later than the next WECC business day.

The WSC shall not schedule a project for Board approval until the window for submitting an appeal of the WSC's approval of the project has expired.

The Director of Standards will attempt resolution with the appellant. If resolution cannot be reached, the Director of Standards will forward the appeal to the WSC for disposition. The WSC's decision may be appealed to the Board. The Board's decision may not be appealed.

### **Step 11 – Obtain Board Approval**

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The WSC shall provide the Board with the RRS or CRT, associated supporting documents as needed, the final ballot results, and a summary of the rationale supporting any negative votes cast. The documents will be posted for Board review for at least the period mandated by the WECC Bylaws. The Board shall consider the RRS or CRT for approval no later than its next regularly scheduled meeting after presentation by the WSC with a request for approval.

Any person or entity may submit comments to the Board for the Board's consideration. The Board shall consider the full development record when making its decision.

If a CRT is approved by the Board, WECC shall post the final CRT on its website and the SAR will be deemed complete. The effective date will be that approved by the Board.

If an RRS is approved by the Board, WECC shall forward the RRS to NERC with a request for approval and subsequent regulatory disposition as needed.

If the RRS or CRT is rejected by the Board, the Board may either deem the SAR complete or remand the RRS or CRT to the DT with specific guidance as to proposed changes.

If the RRS or CRT is remanded, any Substantive Changes shall be vetted in accordance with these Procedures. Under no circumstances shall the Board make Substantive Changes to the RRS or CRT, except in accordance with the terms on Regulatory Directives set forth herein.

### **Step 12 – Submit for NERC and FERC Approval and Implementation**

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Note: Step 12 only applies to RRSs.

All new, revised, or retired RRSs shall be submitted to NERC and then FERC for approval. The approval, revision or retirement of an RRS shall not be effective in the United States until approved by FERC and shall not be effective in another jurisdiction until approved by the applicable governmental authority.

### Step 13 – Retire a CRT

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The WSC may retire all or a portion of a CRT on its own initiative and with no further due process on a finding that each of the following criteria has been met:

- 1) The substance of the document is addressed in a NERC Reliability Standard, other WECC Criteria, supporting WECC documents, or other regulatory document; and
- 2) Retirement of the CRT will not cause a reliability gap.

Proposed retirement of a CRT under this section shall be noticed to the SEL for no less than 14 days and vetted during at least one WSC meeting.

### Step 14 – Submit a Request for Interpretation

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A valid request for interpretation (RI) is one that requests additional clarity about one or more requirements in approved RRSs or CRTs, but does not request approval as to how to comply with one or more requirements. A valid RI response provides additional clarity about one or more requirements, but does not expand on any requirement and does not explain how to comply with any requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk-Power System may request an interpretation of any requirement in any RRS or CRT that has been adopted by the NERC Board of Trustees or the WECC Board, respectively. Interpretations will only be provided for currently effective documents or those that are approved and have a future effective date.

An RI may only seek to clarify or interpret the requirements of the affected document, including, if applicable, any attachment referenced in the requirement being clarified. No other elements of the affected document are subject to interpretation.

The entity requesting the interpretation shall submit a SAR, or its successor form, as provided on the WECC website. The RI shall explain the clarification required, the specific circumstances surrounding the request, and the impact of not having the interpretation provided. The WECC Standards Department shall review the RI to determine whether it meets the requirements for a valid interpretation. Based on this review, the WECC Standards Department shall make a recommendation to the WSC whether to accept the RI for development.

For example, an RI may be rejected where it:

- 1) Requests approval of a particular compliance approach;
- 2) Identifies a gap or perceived weakness in the approved RRS or CRT;
- 3) Can be addressed by an active standard drafting team;
- 4) Requests clarification of any element of an RRS or CRT other than a Requirement;
- 5) Asks a question has already been addressed in the record;
- 6) Identifies an issue and proposes the development of a new or modified RRS or CRT, (such issues should be addressed via submission of a SAR);

- 7) Seeks to expand the scope of an RRS or CRT; or
- 8) The meaning of an RRS or CRT is plain on its face.

If the WSC rejects the RI, it shall provide a written explanation for rejecting the interpretation to the requesting entity within 10 days of the decision to reject. If the WSC accepts the interpretation request, the WSC shall assemble an interpretation drafting team (IDT) to address the request.

Development of the interpretation shall follow the same steps as those for developing an RRS or CRT, with the following exceptions:

- The chair of the WSC shall either assign members of the original DT or solicit nominees for an IDT for approval by the WSC, or both. The IDT shall be composed of SMEs with relevant expertise to address the clarification and, to the extent practical, should include members of the original DT. The IDT shall not include any person representing the entity that filed the RI; however, this prohibition does not preclude representatives of the filing entity from participating in the development process.
- Once an interpretation has been approved by the Board, the interpretation shall be appended to the interpreted document. For an RRS, the interpretation shall be submitted to NERC for NERC and FERC approval.
- The interpretation will remain appended to the interpreted document until such time as the document is revised and the interpretation's content can be addressed during the revision process. RRS interpretations shall not be effective in the United States until approved by FERC and shall not be effective in other jurisdictions until approval by the applicable governmental authority.
- If, during its deliberations, the IDT identifies a reliability gap in the affected document, the IDT shall notify the WSC of its conclusion and may submit a SAR with the proposed modification to the affected document at the same time it provides its proposed interpretation.

## Supporting Processes

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### Expedited Process for Urgent Action

In cases requiring urgent action, such as in the development of emergency procedures, any person or entity may propose an interim RRS or CRT for approval by the WECC Board. The RRS or CRT may go through a process that eliminates any or all of the steps outlined previously, but only to the extent deemed necessary by the Board and only in a manner that is consistent with the WECC Bylaws.

If the Board approves the interim document, it shall establish an initial effective date for the interim document.

Within 90 days after the initial effective date of the document, the Board shall either:

- 1) Cause a SAR to be submitted requesting the development under these Procedures of a permanent replacement to the interim document; or
- 2) Shall extend the applicability of the interim document for an additional 90 days.

The extension can be renewed more than once, but a good faith effort must be made to develop a permanent replacement under these Procedures.

If a SAR is submitted, the interim RRS or CRT shall remain in effect until the permanent replacement RRS or CRT becomes effective.

If a SAR is not submitted and the interim RRS or CRT has not been extended, the interim RRS or CRT shall be deemed retired.

### **Regulatory Directives**

These Procedures acknowledge that FERC may order WECC to make specified regulatory changes to documents created under these Procedures. For the purpose of this section only, those documents are referred to as Directive Regional Reliability Standards (DRRS).

If the Board determines that these Procedures failed to result in a DRRS meeting the mandated regulatory changes, the Board shall have authority to take the following actions to ensure that the DRRS is responsive to the regulatory directive.

1. If the Ballot Pool approves a DRRS that does not address a regulatory directive required to be included in that document, the Board may remand the DRRS to the original DT or instruct the WSC to convene a new or augmented DT to redraft the document. The Board shall instruct the DT on the specific regulatory directive that must be contained in the redraft. Once the DRRS is redrafted it shall be reprocessed under these Procedures.
2. If the Ballot Pool rejects a DRRS or fails to ballot the DRRS due to failure to reach a quorum, either when first presented for ballot or during an iterative redraft as instructed by the Board, the Board shall review the DRRS, including all comments provided and all rationale accompanying any negative vote.
  - Upon a finding that the DRRS was rejected for reasons not related to the regulatory directive, the Board may direct WECC staff to file a new SAR with the specific narrow scope of addressing only the regulatory directive. The Board may suggest specific language for inclusion in the proposed DRRS.
  - Upon a finding that the DRRS was rejected based on language addressing the regulatory directive, the Board shall take the following steps to meet its regulatory obligation:
    - 1) Review the entire record of development.
    - 2) Require a public technical conference to be noticed and convened to determine

whether the rejected DRRS is:

- just and reasonable;
- not unduly discriminatory or preferential;
- in the public interest;
- helpful to reliability;
- practical;
- technically sound;
- technically feasible;
- cost-justified; and,
- meeting the regulatory directive.

3) Determine whether the DRRS should be implemented as drafted, notwithstanding rejection by the Ballot Pool.

- Upon a finding that the rejected DRRS should be implemented, the Board shall approve the DRRS and direct that it be submitted for NERC and FERC approval, as required.
- Upon a finding that the rejected DRRS should not be implemented, the Board may submit the DRRS and its record of development as a regulatory compliance filing in response to the regulatory directive. The filing shall include a recommendation that the DRRS not be made effective and an explanation of the basis for that recommendation.

### **Maintenance of the Procedures**

The WSC is charged with maintenance of these Procedures. Proposed changes to these Procedures shall first be brought to the WSC for consideration. The WSC may initiate proposed changes on its own initiative.

If the WSC determines that a change to these Procedures should be pursued, the WSC shall draft the proposed changes and post the proposed changes to the WECC website for comment, accompanied by a notice to the SEL soliciting comments on the proposed changes.

The WSC shall consider all comments received and shall redraft the proposed changes as it deems necessary. Once the WSC approves the proposed changes, those changes shall be submitted to the Board for approval, subject to the WSC's continuing right to withdraw that request until such time as the Board approves that request. Changes to these Procedures approved by the Board shall be submitted to NERC for NERC and FERC approval.

### **Maintenance of RRSs and CRTs**

The WSC shall ensure that each RRS and each CRT is reviewed at least once every five years from the effective date of the most recent version of the document under review. If the review identifies needed changes, the WSC shall cause a remedial SAR to be filed. If the review does not identify needed changes, no further action is required.

**Field Tests**

WECC will follow a process for field tests or collection and analysis of data to validate concepts, that is similar to the process identified in the NERC Standards Processes Manual, as may be amended.

Approval for a WECC field test shall be obtained from the WSC with consultation from WECC subject-matter experts, as needed. Approval is neither required from NERC nor is there a requirement to consult NERC subject-matter experts.

When a temporary waiver from compliance with either an RRS or a CRT is requested, WECC shall coordinate the test with the appropriate NERC and WECC compliance sections, respectively, before the test begins.



## **ATTACHMENT 2**

Amended Western Electricity Coordinating Council Regional Reliability  
Standards Development Procedures – Redline

# Reliability Standards Development Procedures

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WECC Standards Department

WECC Standards Committee ~~RELIABILITY STANDARDS DEVELOPMENT~~  
~~PROCEDURES~~

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Revised: March 2017



155 North 400 West, Suite 200

Salt Lake City, Utah 84103-1114

## Introduction

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The Western Electricity Coordinating Council (WECC) is a Regional Entity<sup>1</sup> authorized through a delegation agreement between the North American Electricity Reliability Corporation (NERC) and WECC pursuant to Section 215 of the Federal Power Act. NERC delegates designated powers, rights, and responsibilities to WECC regarding the administration within the Western Interconnection of electric Reliability Standards adopted or approved by NERC and the Federal Energy Regulatory Commission (FERC).<sup>1</sup>

These Reliability Standards Development Procedures (Procedures) define the process to be used by WECC for the development, ~~revision, and modification,~~ retirement, and interpretation of Regional Reliability Standards (RRS) and ~~various Other Projects (OP) created under these Procedures.~~ WECC Regional Criteria (CRT).

These Procedures ~~were established to create the structure for~~ establish an open and transparent ~~due~~ process infor the development of WECC RRSs and ~~OPs~~ CRTs. These Procedures include, but are not limited to, public notice of intent to develop RRSs and ~~OPs~~ CRTs, a public comment period on the proposed documents, due consideration of comments provided, and a balanced ~~ballot of interested stakeholders~~ Ballot Body.

The Procedures shall be interpreted and applied in a manner that is consistent with the WECC Bylaws. Should any conflict arise between the Procedures and the WECC Bylaws, the WECC Bylaws will prevail.

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<sup>1</sup> Unless otherwise specified, capitalized terms are defined in the NERC Glossary of Terms Used in Reliability Standards.

## Definitions

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### Ballot Body

That body of qualified ~~WECC Members and non-members~~persons that register with WECC for participation in Ballot Pools.

### Ballot Pool

That pool of Ballot Body entities that have registered to vote on a specific document.

### Day

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~~All references to days are calendar days. When counting the number of days, the count shall exclude the first day of the time window to be measured. If a terminus date falls on a weekend or a day that WECC is scheduled to be closed, the new terminus date shall be the day following the weekend or WECC closure day.~~

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<sup>1</sup>Unless otherwise specified, capitalized terms are defined in the NERC Glossary of Terms Used in Reliability Standards.

~~For example, if a 15-day period ends on a holiday the terminus date is on the following WECC business day.~~

### Drafting Team (DT)

A team of pertinent subject-matter experts (SME) ~~that was~~ appointed by the WECC Standards Committee (WSC) to develop the document(s) ~~that were~~ called for in a Standard Authorization Request (SAR), ~~to~~ consider and respond to industry comments, participate in forums to help build consensus on draft documents, and ~~to~~ perform other tasks as assigned by the WECC Standards Committee (WSC).

### Electric Line of Business

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~~The generation, transmission, distribution, or trading of electricity or the provision of related energy services in the Western Interconnection.~~

### NERC Compliance Registry

Registry of the Bulk Electric System owners, operators, and users that are subject to approved reliability standards.

### Non-Substantive Changes

~~A Non-Substantive Change is one~~Revisions that does do not change the scope, applicability, or intent of the document, ~~or the actions required by affected entities.~~

~~For example, Non-Substantive Changes include, any requirement, including but are not limited to,~~ correcting ~~grammar or sentence structure, typographical or spelling errors, font and formatting, the numbering,~~ of a requirement, correcting references, changes to document styles and templates, correcting the spelling of a word, adding an obviously missing word, or rephrasing a statement to improve itsrequirement for improved clarity. ~~Non-Substantive Changes do not require, but may receive posting for comments and/or revision of the document under these Procedures.~~

### Other Projects (OP)

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~~Any document type other than an RRS developed under these Procedures. These include, but are not limited to, WECC Criteria.~~

### **Participating Stakeholder**

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~~Any person or entity that is not a WECC Member, but who has applied for and been granted participating stakeholder rights as defined and currently set forth in the WECC Bylaws.~~

### **Regional Criteria (CRT)**

As defined in the NERC Rules of Procedure.

### **Regional Reliability Standard (RRS)**

~~A requirement approved by FERC under Section 215 of the Federal Power Act, to provide for reliable operation of the Bulk Electric System in the United States. Regional Reliability Standards are specific to the Western Interconnection and shall be established using these~~

~~Procedures. When approved by FERC and applicable authorities in Canada and Mexico, Regional Reliability Standards shall be made part of the body of NERC Reliability Standards and shall be enforced upon all applicable Bulk Electric System owners, operators, and users within the WECC area, regardless of membership in the region.~~

As defined in the NERC Rules of Procedure.

### **Standard Authorization Request (SAR)**

The WECC form titled Standard Authorization Request (SAR) administrated by the WECC Standards Department for the purpose of requesting development, ~~revision~~modification, retirement, ~~or~~ interpretation, or other disposition of an RRS or ~~OP~~CRT.

### **Standards Briefing**

Any meeting initiated by WECC for the purpose of creating an open forum for discussion and explanation of an RRS or ~~OP~~CRT; generally, but not exclusively, held during the development process of those documents in advance of a ballot window.

### **Standards Email List (SEL)**

Email list(s) established and maintained by WECC for the purpose of communicating due process activity; generally, but not exclusively, for standards ~~related activities~~related activities.

### **Substantive Changes**

A Substantive Change is one that changes the scope, applicability, required actions, or intent of the document, ~~or the actions required by affected entities.~~

### **WECC Standards Committee (WSC)**

~~For example, Substantive Changes include but are not limited to:~~

- ~~• changes to the functional entities listed in the applicability section of the RRS or OP;~~
- ~~• changes to the effective date;~~
- ~~• adding, deleting or revising requirements, measures or explanatory narrative.~~

~~Substantive Changes to an RRS or an OP require at least one posting / comment / response cycle.~~

## **WECC Member**

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Any entity that has applied and been accepted for membership in WECC and is current in the payment of dues.

## **The committee ~~WECC Standards Committee (WSC)~~**

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**Committee** established by the WECC Board of Directors (Board) for the purpose of overseeing the implementation of these Procedures pursuant to its Board-approved charter.

## **Overview**

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This document has two ~~dominate~~primary sections. The first section describes the steps to be taken during development ~~steps for the Normal Process for Regional Reliability Standards and Other Projects of an RRS or CRT, absent exceptional circumstances~~. The second section augments the first with Supporting Processes to address exceptions such as an expedited process for urgent actions, addressing regulatory directives, and maintenance of certain documents.

## Development Steps/~~Table of Contents~~

The following ~~development~~ steps are included in the ~~normal process for Regional Reliability Standards and Other Projects~~ section: development of an RRS or CRT, absent exceptional circumstances. Click on any item below to display details on how to complete the step.

<del>Step 1 – Submit and Validate a Standard Authorization Request</del> .....	<del>7</del>
<del>Step 2 – Complete SAR and Present to the WSC</del> .....	<del>7</del>
<del>Step 3 – Convene the Drafting Team</del> .....	<del>8</del>
<del>Step 4 – Begin Drafting Phase and Submit Draft to WSC</del> .....	<del>9</del>
<del>Step 5 – Post for Comment</del> .....	<del>10</del>
<del>Step 6 – Respond to Comments</del> .....	<del>11</del>
<del>Step 7 – Submit Proposed Draft to the WSC with a Request for Ballot</del> .....	<del>12</del>
<del>Step 8 – Convene a Standards Briefing</del> .....	<del>12</del>
<del>Step 9 – Form the Ballot Pool and Ballot the Standard</del> .....	<del>13</del>
<del>Step 10 – Initiate the Appeals Process – If Needed</del> .....	<del>15</del>
<del>Step 11 – Obtain Board Approval</del> .....	<del>15</del>
<del>Step 12 – Submit RRSs for ERO Review, FERC Approval &amp; Implementation of WECC Regional Reliability Standards</del> .....	<del>16</del>
<del>Step 13 – Retire an OP</del> .....	<del>16</del>
<del>Step 14 – Submit a Request for Interpretation</del> .....	<del>16</del>
<u>Step 1 – Submit and Validate a Standard Authorization Request</u> .....	<u>14</u>

<u>Step 2 – Complete SAR and Present to the WSC.....</u>	<u>14</u>
<u>Step 3 – Convene the Drafting Team.....</u>	<u>16</u>
<u>Step 4 –Begin Drafting Phase and Submit Draft to WSC.....</u>	<u>18</u>
<u>Step 5 – Post for Comment.....</u>	<u>20</u>
<u>Step 6 – Respond to Comments .....</u>	<u>21</u>
<u>Step 7 – Submit Proposed Draft to the WSC with a Request for Ballot .....</u>	<u>13</u>
<u>Step 8 – Convene a Standards Briefing.....</u>	<u>14</u>
<u>Step 9 – Form the Ballot Pool and Ballot the Standard.....</u>	<u>15</u>
<u>Step 10 – Initiate the Appeals Process – If Needed.....</u>	<u>19</u>
<u>Step 11 – Obtain Board Approval .....</u>	<u>19</u>
<u>Step 12 – Submit for NERC and FERC Approval and Implementation.....</u>	<u>21</u>
<u>Step 13 – Retire a CRT.....</u>	<u>21</u>
<u>Step 14 – Submit a Request for Interpretation .....</u>	<u>22</u>

The following related processes are included in the Supporting Processes section:

- Expedited Process for Urgent Action
- Regulatory Directives
- Maintenance of the Procedures
- Maintenance of RRSs and ~~OPs Documents~~CRTs

- Field Tests

## Notices and Counting of Days

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Notices required under these Procedures shall be distributed electronically via WECC's SEL(s) and deemed delivered when ~~posted on the WECC website, except as noted in the following paragraph.~~ dispatched. ~~Concurrent running of notice and posting periods is explicitly allowed.~~

Concurrent running of notice and posting periods is explicitly allowed.

WECC shall provide notice to NERC of all standards-related activities by including NERC on WECC's SEL. Inclusion of a NERC-provided email address on the related SEL shall constitute coordination of notice to NERC of standards-related activities and shall be deemed delivered ~~upon dispatch~~ when dispatched via the SEL(s).

~~All WECC Members and Participating Stakeholders will be given an opportunity to receive~~ Any person may receive notices provided via the SEL.

All references to days are calendar days. When counting the number of days, the count shall exclude the first day of the time window to be measured. If a terminus date falls on a weekend or a day that WECC is scheduled to be closed, the new terminus date shall be the day following the weekend or WECC closure day.

### ~~WECC Standards Committee (WSC)~~

~~For example, if a 14-day period ends on a holiday then the terminus date is on the following WECC business day.~~

### WECC Standards Committee

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The WSC manages these Procedures. The WSC protects the integrity, credibility and implementation of the Procedures while acting in accordance with the WSC Charter. Delineation of specific WSC duties, WSC composition and governance, ~~WSC voting~~ WSC voting privileges, and other related practices, ~~shall be included in accordance with the WSC charter~~ Charter, as approved by the Board.

### WECC Standards Voting ~~Sectors~~Segments

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~~There are eight (8)~~ WECC's Standards Voting ~~Sectors~~ Segment (SVS) ~~in which an~~ shall be

~~the same as those established by NERC.<sup>2</sup> A qualifying entity may register to vote. The SVSs are divided into two separate categories: Registered and Non-Registered.~~

~~The Registered category is for those entities *registered* on the NERC Compliance Registry and to those Canadian and Mexican entities that perform functions that, if performed in the United States, would allow those entities to be registered for compliance in the NERC Compliance Registry. The Non-Registered category is for all others meeting the qualifications of those defined SVSs. A single entity cannot be in the Registered category and the Non-Registered category at the same time.~~

~~SVSs 1 through 5 are “Registered” SVSs.~~

- ~~1) Transmission Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Transmission Owners, Transmission Operators, Transmission Service Providers, or Transmission Planners;~~
- ~~2) Generation Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Generation Owners or Generation Operators;~~
- ~~2) Marketers and Brokers Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Purchasing-Selling Entities.~~

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<sup>2</sup> NERC currently establishes its SVS in the NERC Rules of Procedure, Appendix 3D – Development of the Registered Ballot Body. If the SVSs contained in that appendix or its successor should vary from time to time it is the intent of these Procedures that WECC’s SVS will mirror those of NERC without requiring further change to the Procedures to accommodate those changes.

- ~~2) Distribution Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Distribution Providers or Load-Serving Entities;~~
- ~~2) System Coordination Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Balancing Authorities, Reserve Sharing Groups, Planning Authorities/Coordinators, Resource Planners, Interchange Authorities/Coordinators, or Reliability Coordinators.~~

~~SVS 6 through 8 are “Non-Registered” SVSs.~~

- ~~2) End-Use Representative Sector. This sector consists of entities not on the NERC Compliance Registry, but that are WECC Members and are end users of significant amounts of electricity in the Western Interconnection, including: industrial, agricultural, commercial and retail entities as well as organizations in the Western Interconnection that represent the interests of cast a substantial number of end users or a substantial number of persons interested in the impacts of electric systems on the public or the environment.~~
- ~~2) State and Provincial Representatives Sector. This sector consists of entities not on the NERC Compliance Registry, but that are WECC Members that are representatives of states and provinces in the Western Interconnection provided that such representatives will have policy or regulatory roles and do not represent state or provincial agencies and departments whose function involves significant direct participation in the market as end users or in Electric Line of Business activities.~~
- ~~2) Other Non-Registered WECC Members and Participating Stakeholders Sector. This sector consists of (1) Participating Stakeholders as defined in the WECC Bylaws, (2) WECC Members not on the NERC Compliance Registry that are Electric Line of Business entities doing business in the Western Interconnection that do not own, control or operate transmission or distribution lines in the Western Interconnection, including power markets, independent power producers, ballot in any other entities whose primary business is the provision of energy services, and (3) those entities that are not eligible for membership in any other Standards Voting Sector and who have a substantial interest in the purposes of WECC.~~

~~If a single entity qualifies for more than one Registered SVS, that entity may register and vote in each Registered SVS SVS(s) for which it qualifies. For example, if a single entity was registered in the NERC Compliance Registry as a transmission owner and also a generator owner; that single entity could register and vote once in SVS-1 and once in SVS-2.~~

~~Non-Registered SVSs 6 through 8 represent those entities that are *not registered* in the NERC Compliance Registry. Unlike Registered SVSs 1 through 5, entities in Non-Registered SVSs 6 through 8 are only eligible to register and vote in a single SVS.~~

**Normal Process for Development of Regional Reliability Standards ~~and Other Projects,~~  
Regional Criteria, and Interpretations**

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## Step 1 – Submit and Validate a Standard Authorization Request

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Development, revision ~~or~~, retirement, or interpretation of ~~a Regional Reliability Standard (an RRS)~~ or ~~Other Project (OP) CRT~~ shall be initiated by the filing of a Standard Authorization Request (SAR) by any person or entity. A SAR is filed by completing the electronic fields of the online WECC SAR form. WECC staff shall review the incoming SAR to ensure it is valid.<sup>3</sup> Once deemed valid, the SAR shall be ~~immediately~~ posted on the WECC website and notification shall be sent to the SEL.<sup>2</sup>

## Step 2 – Complete SAR and Present to the WSC

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WECC staff shall assign a unique tracking number to each SAR. The unique tracking number shall be used to identify the SAR throughout the development and archival processes. The SAR and those documents developed in response to the SAR shall be publicly accessible on the WECC website throughout the development process. WECC staff shall determine within 30 days of receiving a SAR whether it is complete. WECC staff may assist with completing the SAR, or report to the WSC that it is incomplete and request guidance.

~~WECC staff shall determine within 30 days of receipt whether a SAR is complete. WECC staff may assist with completing the SAR, or report to the WSC that the SAR is incomplete and request guidance.~~

To be deemed complete, each SAR shall contain a description of the proposed RRS or ~~OP~~ CRT subject matter sufficiently detailed to ~~clearly~~ define the purpose, scope, impacted parties, requirements, and any other information relevant to the proposed RRS or ~~OP~~.

~~CRT. Once deemed complete by WECC staff, WECC staff shall notify the WSC that the SAR has been received and agrees it is complete, and WECC staff shall place the SAR on the agenda for the next scheduled WSC meeting for disposition, subject to required notice. -Notice of WSC meetings and posting of WSC agendas will be provided in accordance with the WSC Charter.~~

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<sup>3</sup> A “valid” SAR is different than a “complete” SAR. A SAR is deemed valid by staff as a threshold review that filters out spam and unwanted nuisance documents that may be received via an open website portal. Whether a SAR is “complete” is addressed in Step 2.



The WSC shall determine whether the SAR is within the scope of WECC's authority and activities, and is appropriate for development. Public comment on the SAR will be reviewed and considered by the WSC during a duly noticed WSC meeting prior to the WSC approving the SAR.

The WSC shall make ~~that the above~~ determination within ~~60~~90 days of the date that the SAR is received by WECC, except where the SAR has been remanded, in which case the WSC shall make that determination within 30 days of receiving the curative SAR. ~~Public comment on the SAR will be reviewed and considered by the WSC during a duly noticed WSC meeting prior to the WSC approving the SAR.~~

The WSC shall ensure that the SAR provides enough information that a Drafting Team (DT) will have a clear understanding of the reasons for, and nature of, the RRS or ~~OPCRT~~ to be developed. The SAR author may be asked to further assist in the development or clarification of the SAR.

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~~<sup>2</sup>A "valid" SAR is different than a "complete" SAR. A SAR is deemed valid by staff as a threshold review that filters out spam and unwanted nuisance documents that may be received via an open website portal. Whether a SAR is "complete" is addressed in Step 2.~~

### ~~clarification of the SAR.~~

The WSC may accept the SAR, in which case development proceeds to Step 3.

The WSC may remand a SAR if it determines the content of the SAR is deficient. If the SAR is deemed deficient, the WSC shall specify the deficiency identified in the SAR and suggest potential remedies as part of its remand. WECC staff will make reasonable efforts to assist the SAR author in addressing the deficiencies identified by the WSC.

The SAR author shall have 30 days from the date of remand or until the 60th day following submittal of the SAR, whichever is longer, to remedy each deficiency identified in the remand, or withdraw the SAR.

If the deficiencies are remedied, WECC staff will resubmit the SAR to the WSC for disposition. If the deficiencies are not remedied within the allotted period: 1) the SAR will be deemed incomplete, 2) no further developmental action will be taken on the SAR, and 3) the SAR will be archived. The SAR author may submit a new SAR without prejudice based on the same or similar fact pattern.

The WSC may reject a SAR if it determines the SAR is outside the scope of WECC's authority or is not appropriate to be undertaken by WECC. If a SAR is rejected, the WSC shall post its explanation for rejection on the WECC website. Notification of the WSC's decision shall: ~~1)~~

~~1) be communicated to the SAR author, the Board, and the Standards Email List (SEL), 2),~~

~~1)2) \_\_\_\_\_ reference the unique SAR tracking number and direct the recipient to supporting information as appropriate, and 3) be made no more than 30 days from the date of the WSC's determination. The WSC's decision to reject a SAR may be appealed to the Board.~~

~~3) be made no more than 30 days from the date of the WSC's determination.~~

The WSC's decision to reject a SAR may be appealed to the Board.

### Step 3 – Convene the Drafting Team

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If it accepts a SAR, the WSC may, at its discretion, expand or narrow the scope of the SAR: at any time during the development process prior to approving the project for ballot. The WSC shall prioritize the development of the SAR in relation to other RRSs or OPs/CRTs proposed for development under the Procedures, as may be required based on the volume of requests and available resources. If prioritization dictates a postponed starting date, the

~~WSC shall~~ WSC shall either set a postponed starting date or set a review date ~~upon~~ at which the ~~WSC shall~~

WSC shall re-evaluate the SAR for purposes of its progress through these Procedures. In no case shall the review date be more than 180 days after the date the SAR was received.

Upon establishing a start date for the development of an RRS or ~~OP~~ CRT, the WSC shall convene a DT to develop the RRS or ~~OP~~ CRT required by the SAR. The WSC may either directly assign a DT or solicit team member nominations from the industry. The WSC shall approve the DT membership within ~~60~~ 120 days of establishing a start date. The WSC may augment ~~or~~, modify, or replace DT membership at any time as needed.

Because the DT chair's primary responsibility is leadership and coordination, the ~~DT chair~~ DT chair need not be a SME in the field associated with the SAR.

Names of DT members will be posted on the ~~associated project development~~WECC website.

~~The WSC should provide to the DT a proposed starting date and an expected completion date.~~

#### Step 4 –Begin Drafting Phase and Submit Draft to WSC

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All DT meetings shall be open and publicly noticed on the WECC website.

The DT will begin working on the documents required by the SAR following assignment by the WSC. Notice of each DT meeting shall be ~~posted on~~dispatched via the ~~WECC website for~~SEL a minimum of ~~15~~14 days prior to the meeting.

The author of the SAR may participate in the drafting process. The author of the ~~SAR may~~SAR may be asked to provide additional information, supporting studies, and other information to support the requirements of the proposed RRS or ~~OP-CRT~~.

An RRS shall include those sections mandated by NERC, such as an applicability section, effective date, mandatory requirements, affected time horizons, measures, compliance, violation risk factors (VRF), and violation severity levels (VSL).

Each RRS shall promote at least one reliability principle and be consistent with all reliability principles and NERC market interface principles. Each RRS shall provide for as much uniformity as possible with ~~reliability standards~~Reliability Standards across the interconnected Bulk-Power System of the North American continent.

An RRS shall either:

- 1) be more stringent than a continent-wide reliability standard,
- 2) include a regional difference that addresses matters that the continent-wide reliability standard does not, ~~or shall be a regional difference necessitated by a physical difference in the Bulk Power System;~~ or
- 3) be a regional difference necessitated by a physical difference in the Bulk-Power System.

An RRS or ~~OP~~CRT may include a guidance section, background section, or other narrative sections; however, these sections are not required. Incorporation of extrinsic documents into an RRS or ~~OP~~CRT should be avoided.

An RRS or ~~OP~~CRT may include new definitions of terms that need to be added to the NERC or WECC or NERC glossaries/glossary, respectively. Wherever possible, DTs are encouraged to use existing defined terms rather than create new defined terms.

In drafting the applicability section of an RRS, only ~~those functional entities listed in the currently approved NERC Functional Model shall~~ Compliance Registry will be used. ~~When drafting the applicability section~~

~~To avoid conflict of an OP, use of the NERC Functional Model is not required. Development of an OP should conform to interest WECC internal policies, and practices, unless otherwise specified herein its committees and subgroups, shall not be listed as the applicable entity in an RRS or CRT.~~

In the course of its assignment, the DT shall, at a minimum:

- ~~Review~~review any preliminary technical assessment provided with the SAR;
- ~~Perform~~perform or request additional technical studies ~~as needed;~~ deemed necessary either by the DT or at the direction of the WSC;
- ~~Prepare~~prepare supporting documents to support the RRS or ~~OP~~CRT as needed; and

- ~~Request from the WSC request~~ additional time from the WSC to develop the RRS or OPCRT, if necessary.

## Step 5 – Post for Comment

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~~Upon~~On completion of each iterative draft of the RRS or OPCRT, WECC staff shall facilitate the posting of the draft RRS or OPCRT on the WECC website, along with supporting documents, if any, for a comment period of no less than ~~45 days for the first iteration and no less than~~ 30 days for each ~~iteration thereafter posting~~, except as allowed in the Expedited Process for Urgent Action section of these Procedures.

An implementation plan shall be included in at least one iterative posting during the development of the RRS or OPCRT and shall be a part of the final record for consideration prior to ballot.

(Interpretations do not require an implementation plan.)

A notice that the comment period has ~~been~~ opened shall be distributed via the SEL. The notice shall include, at a minimum, the following information:

- ~~Identification~~identification of the RRS or OPCRT;
- ~~What~~what action is being taken (e.g., request for ~~30 or 45 day~~ comment);
- ~~The~~the location of the document for review;
- ~~How~~how to submit comments or perform the requested action; and
- ~~The~~the opening and closing dates during which the solicited action shall take place. Unless otherwise posted, all posting periods close at ~~56~~:00 p.m. (Mountain).

WECC shall open a ~~Web~~web portal to serve as the sole means of receiving comments on the RRS or OPCRT. Comments received via other media or received outside of the posted comment period will be accepted at the discretion of the DT. Comments may be submitted by any individual or entity, or a group of parties with a common comment.

To streamline the process, if a group of parties elects to submit a common comment, those parties are encouraged to submit that common comment only once and append to the comment the names of all those individuals, entities, or groups that are in support of the common position. DTs ~~are charged to~~shall give due weight to such a joint comment ~~and not to view the comment as having been received by a single individual or entity.~~

The WSC shall monitor each posting and review the posted documents to ~~determine whether~~ensure that the DT RRS or CRT:

- 1) remains within the scope of the SAR.~~At;~~
- 2) continues to be appropriate for development; and
- 3) meets any time prior to opening a Ballot Pool, if the regulatory or policy-related directive including, but not limited to, adherence to these Procedures.

On a finding by a majority of the WSC concludes members that the proposed RRS or OP is not within the scope of the SAR or CRT does not meet other regulatory requirements or directives one or more of the above three criteria, the WSC ~~shall either remand the RRS or OP to the DT with a specific explanation identifying the deficiencies that must be remedied,~~may:

- 1) adjust the scope of the SAR,~~or retain;~~
- 2) remand the work product to the DT with specific remedial direction;
- 3) exercise its right to augment, modify, or replace any or all of the DT members; or
- 4) exercise any combination of the above.

The WSC's rights and obligations specified in Step 5 terminate once a Ballot Pool is opened. The WSC retains the SAR as drafted and replace right to recommend that the DT Board not approve a specific RRS or CRT even though the project may subsequently be approved by the Ballot Pool.

~~Upon receiving the remanded RRS or OP and explanation of deficiencies, the DT shall initiate a redraft following the steps contained in these Procedures. If a new DT is assigned, the new DT shall start the development efforts at Step 4 of these Procedures.~~

## Step 6 – Respond to Comments

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The DT shall consider all comments submitted in accordance with these Procedures. If the same comment is provided more than once in a single posting, the DT may provide a single response to all comments that raise the same or a similar concern. If the same comment is received in iterative postings, the DT is not obligated to respond to comments previously addressed.

The DT shall prepare a ~~summary of the response to~~ summary of the response to comments received ~~and that includes reporting~~ the changes made to the proposed RRS or ~~OP-CRT~~ as a result of comments received, if any. The DT shall ~~summarize also report on~~ summarize also report on comments that were rejected by the DT, in whole or in part, and the reason(s) ~~that these the~~ that these the comments were rejected. The ~~summary, along with a~~ summary, along with a response to ~~each comment received, comments~~ each comment received, comments will be posted on the WECC website no later than the next posting of the proposed RRS or ~~OP-CRT~~.

~~All parties submitting comments are encouraged to participate in the DT meetings during which responses to their comments are considered and drafted.~~

The DT should target posting its responses to the WECC website no later than 30 days after the comment window has closed. If more than 30 days are required, the DT chair ~~shall or WECC Staff~~ should advise the WSC chair of the DT's progress and request additional assistance ~~as if~~ needed.

All parties submitting comments are encouraged to participate in the DT meetings during which responses to their comments are considered and drafted.

### Treatment of Substantive Changes

All Substantive changes to an RRS or CRT require at least one posting / comment / response cycle.

If the DT determines that comments received during any posting warrant a Substantive Change to the language of an RRS or ~~OP-CRT~~, the DT shall consider each comment and redraft the RRS or ~~OP-CRT~~ accordingly, repeating the posting / comment / response cycle as many times as needed to address ~~the~~ Substantive Changes while staying within the scope of the SAR.

If at any time during the development process the DT determines that the scope of the SAR should be adjusted, the DT shall present that request to the WSC for disposition.



If at any time during the development process the DT determines that it has reached a developmental impasse, the DT shall present the issue to the WSC for disposition.

If comments received during any posting do not warrant a Substantive Change to the language of an RRS or ~~OP~~CRT, the DT shall be polled at a regularly scheduled and announced DT meeting and asked whether the RRS or ~~OP~~CRT should be forwarded to the WSC with a recommendation to ballot the document. If the DT ~~concludes~~affirms by ~~an affirmative~~a majority vote of those present that the RRS or ~~OP~~CRT should be forwarded to the WSC with a recommendation for ballot, the document will be forwarded accordingly.

### Treatment of Non-Substantive Changes

~~These Procedures acknowledge that a Non-Substantive change may be discovered at any point during or after the final development of the RRS or OP.~~

Non-Substantive Changes ~~to an RRS shall be handled in accordance with the NERC~~do not require a posting / comment / response cycle.

Non-Substantive errors discovered prior to the opening of a WECC ballot on either an RRS or a CRT may be corrected by the WSC.

Regional Reliability Standards ~~Development Manual or its successor.~~

~~Non-Substantive Changes to an OP shall be addressed using WECC's internal policies and practices. Non-Substantive changes for OPs do not require a comment / response cycle.~~

If a Non-Substantive Change to an RRS is required at any time after a WECC ballot window opens, the proposed change shall be presented to the WSC with a request for approval. If the WSC agrees that the correction of the error does not change the scope or intent of the associated RRS, and agrees that the correction has no material impact on the applicable entities, then the correction shall be filed for approval with NERC and applicable governmental authorities as appropriate.

#### WECC Regional Criteria

If a Non-Substantive Change to a CRT is required at any time after a WECC ballot window opens, the proposed change shall be presented to the WSC with a request for approval. If the WSC agrees that the correction of the error does not change the scope or intent of the associated CRT, and agrees that the correction has no material impact on the applicable entities, the WSC shall approve the change and instruct WECC staff to make the change. No further action is required.

Changes to document styles and templates as adopted by WECC for CRTs and NERC for RRSs are explicitly within the purview of staff and do not require further approval.

### **Step 7 – Submit Proposed Draft to the WSC with a Request for Ballot**

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~~Upon~~On completion ~~of the proposed RRS or OPs~~, the DT shall present the proposed RRS or ~~OPs~~CRT to the WSC during a duly noticed WSC meeting with a request for ~~ballot~~balloting by a WECC Ballot Pool. The WSC shall address that request no ~~later than~~later than its next ~~regularly scheduled~~duly noticed meeting.

After receiving a request for ballot, the WSC shall review the final draft of the RRS or ~~OP~~CRT as presented and determine whether it fulfills the requirements stated in the SAR. The WSC shall also consider whether extrinsic requirements, such as FERC orders, Board directives, or other regulatory directives are met by the content of the document.

If the WSC concludes that the proposed RRS or ~~OP~~CRT is ready for ballot, the WSC shall forward the ~~RRS or OP~~draft document to WECC staff with a request that a Ballot Pool be formed from the Ballot Body, for the specific intent of seeking approval of the ~~proposed RRS or OP~~document.

The results of the WSC's vote to forward the RRS or ~~OP~~CRT to the Ballot Pool shall be documented. Any WSC member that opposes submittal of the RRS or ~~OP~~CRT will be encouraged to provide dissenting comments, and, if possible, specific language that would make the ~~draft~~ document

acceptable to the dissenting member. If the WSC cannot reach agreement to submit the ~~RRS or OP~~ draft document to the Ballot Pool, the WSC will report to and seek guidance from the Board.

If the WSC concludes that the proposed RRS or ~~OP~~CRT is not ready for ballot because it does not fulfill the requirements of the SAR or because it fails to meet other regulatory requirements or directives, the WSC shall remand the RRS or ~~OP~~CRT to the DT with a specific explanation identifying the deficiencies that must be remedied.

Upon receiving the remanded RRS or ~~OP~~CRT and explanation of deficiencies, the ~~DT shall~~DT shall:

- ~~2)1)~~ 1) Redraft the RRS or ~~OP~~CRT accordingly;
- ~~3)2)~~ 2) Initiate iterative comment / response cycles as needed until it again concludes that no further Substantive Changes are needed; and
- ~~4)3)~~ 3) Return the proposed RRS or ~~OP~~CRT to the WSC for disposition.

## Step 8 – Convene a Standards Briefing

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Once the WSC approves submitting the RRS or ~~OP~~CRT to the Ballot Pool ~~for ballot, WECC shall, WECC shall~~ dispatch notice to the SEL that a Standards Briefing will be held to discuss the content of the proposed RRS or ~~OP~~CRT prior to balloting. Notice shall be provided ~~15~~14 days or more before the Standards Briefing is to be held and shall provide, at a minimum, ~~the following~~the following:

- 1) Identification of the RRS or ~~OP~~CRT;
- 2) The time and place of the Standards Briefing; and

- 3) The WECC website location of the proposed RRS or OPCRT and related documentation for review.

## Step 9 – Form the Ballot Pool and Ballot the Standard

---

Any individual or entity seeking participation in the ~~ballot~~Ballot Pool of an RRS or OPCRT shall first apply to WECC for Ballot Body membership in any SVS in which it is eligible. WECC staff shall review the request and confirm eligibility to join the Ballot Body. Prior to confirmation of eligibility the application is considered pending. While an application is pending, the applicant cannot join a Ballot Pool. Applications received less than five days prior to the opening of a Ballot Pool may not be considered for inclusion in that Ballot Pool.<sup>4</sup> Decisions of staff to deny the admission of an individual or entity to an SVS may be appealed in accordance Step 10 of these Procedures.

~~Decisions of the staff to approve, deny, or restrict the admission of an individual or entity to a voting sector may be appealed in accordance with the WECC Bylaws.~~

WECC staff shall require Ballot Body members to identify their Affiliates (as defined in the WECC Bylaws) who are also Ballot Body members. Affiliates within a single SVS may only have one vote in that SVS. Affiliates within a single SVS must designate a single Affiliate as the group's Ballot Pool member to vote in that SVS.

From the Ballot Body, a discrete Ballot Pool will be formed for each RRS or OPCRT to be balloted under these Procedures. All members of the Ballot Body shall be provided an opportunity to opt into a Ballot Pool formed for purposes of voting on each RRS or OP-CRT. Once a Ballot Pool is established, an entity shall not be allowed to change the SVS(s) in which it has registered until balloting of the associated project has concluded. It is the Ballot Pool that votes on RRSs and OPsCRTs developed under these Procedures.

Notice that a Ballot Pool is forming will be dispatched via the SEL- and posted to the WECC website. That notice shall contain, at a minimum, the following information:

- ~~2)1)~~ \_\_\_\_\_ Identification of the RRS or OP;CRT;
- ~~3)2)~~ \_\_\_\_\_ The proposed action to be taken (e.g., Notice of Ballot Pool Formation / Notice of Ballot);
- ~~4)3)~~ \_\_\_\_\_ When the Ballot Pool will open;

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<sup>4</sup> This period allows for review, confirmation, information technology functions, and the potentiality of holidays.

~~5)4)~~ \_\_\_\_\_ When the ballot will take place;

~~6)5)~~ \_\_\_\_\_ How to cast a vote; and

~~7)6)~~ \_\_\_\_\_ The WECC website location of the proposed RRS or OPCRT and related ~~documentation~~documents for review.

The Ballot Pool registration window shall remain open for a period determined by WECC staff, but in no case shall the Ballot Pool registration window be open less than 1514 days or more than 3060 days.

Once notice of a Ballot Pool forming has been dispatched: ~~1)~~, the ballot window shall commence no sooner than 1514 days and no later than 45 days after that dispatch; ~~and 2) no Substantive Changes may be made to the proposed document unless the revisions are posted for an iterative comment / response cycle and a new date is set for ballot.~~

Once the ballot window opens, no Ballot Body member may join or withdraw from the Ballot Pool. The WECC Director of Standards (~~DOS~~) may has sole discretion to authorize deviations from this rule for ~~extraordinary circumstances such as the death, retirement, or disability of a Ballot Pool member that would prevent an otherwise eligible entity from casting a vote during a given ballot window.~~

good cause shown. Voting on an RRS or OPCRT shall be via electronic voting administered on the WECC website. The default voting window shall be a period of 1514 days; however, the window may ~~be held~~remain open up to a maximum of 60 days to reach a quorum. ~~During a ballot window, WECC shall not sponsor or facilitate public discussion of the standard to be balloted.~~ Additional Standards Briefings may be held as needed.

Eligible members of the Ballot Pool may cast one vote in each SVS for which they are eligible.

~~Participating Stakeholders may only vote on an RRS if they have applied for and been granted Participating Stakeholder status. A Participating Stakeholder is only entitled to vote on an RRS and may only vote on a WECC Criterion if the proposed WECC Criterion could result in sanction to a non-WECC Member. A Participating Stakeholder is not entitled to vote on any other OP.~~

~~Each member of the Ballot Pool casting a negative vote on an RRS or OP will be required to provide a statement~~Negative votes will not be counted unless accompanied by a narrative explaining the reason for the negative vote. The statement should include language that would make the RRS or OPCRT acceptable. The statement will be included in the voting record for consideration by the WSC and the Board.

A two-thirds ~~(2/3)~~ quorum of the Ballot Pool is required for each vote. ~~Quorum shall be based on the total number of Ballot Pool members and shall not be based on the total number of votes cast.~~ Abstentions and negative votes cast without an explanation shall not be counted for the purpose of determining consensus, but will be counted for purposes of obtaining a quorum.

A weighted two-thirds affirmative fractional majority vote of the Ballot Pool is required for an RRS or OPCRT to be approved. Voting among the SVSs shall be weighted as follows:

For each SVS with 10 or more voters, the number of affirmative votes cast shall be divided by the sum of the affirmative ~~and~~votes plus the negative votes cast to determine the fractional affirmative vote for that SVS.

For each SVS with less than 10 voters, the same process shall be used to determine the fractional affirmative vote, but the fractional affirmative vote of that SVS shall be multiplied by 10 percent times the number of voters.

- ~~○~~ For example, for SVSs with nine voters, the fractional affirmative vote will be multiplied by 90 percent.
- The sum of the fractional affirmative votes from all SVSs divided by the weighted number of SVSs voting shall be used to determine if a ~~weighed~~weighted two-thirds affirmative fractional majority vote has been achieved and whether the RRS or OPCRT has been approved. An SVS shall be considered as voting if any member of the SVS in the Ballot

Pool casts either an affirmative or a negative vote. ~~If there are more than ten voters in the SVS, the weighting used for the calculation of “weighted sectors voting” shall be 100 percent. For SVSs with less than ten voters, the weighting used for the calculation of the “weighted sectors voting” shall be 10 percent per voter.~~

An RRS or ~~OPCRT~~ shall be deemed approved by the Ballot Pool if the sum of fractional affirmative votes from all SVSs divided by the weighted number of voting SVSs is a two-thirds affirmative fractional majority ~~(i.e., greater than 50 percent).~~

After a vote by the Ballot Pool, the WSC shall take one of the following actions.

If the Ballot Pool approves an RRS or ~~OP~~CRT, the WSC shall submit the RRS or ~~OP~~CRT to the Board ~~with a request for approval. The WSC shall provide voting results to the Board, including the final ballot results and any rationale supporting any negative votes cast.~~ disposition.

~~Any RRS or OP that was provided to the Board for approval will be posted for Board review for at least the period mandated by the WECC Bylaws.~~

If the Ballot Pool rejects the RRS or ~~OP~~CRT, the SAR shall be deemed complete and all associated documents shall be archived, except as allowed in the Regulatory Directive section of these Procedures.

## Step 10 – Initiate the Appeals Process – If Needed

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~~An~~ Any person may appeal ~~may be brought on the basis~~ the alleged non-adherence to any provision of either a technical (reliability) concern or a due process (procedural) concern.

~~If the~~ these Procedures. The request for appeal ~~is based on technical,~~ along with an explanation of the alleged grounds, ~~that for~~ appeal ~~may be brought at any stage of the development process prior to the opening of a ballot window. The appeal shall,~~ must be submitted to the ~~DOS~~ who shall ~~place~~ Director of Standards no later than 10 days after the alleged grounds for appeal arise. If the 10<sup>th</sup> day is not a WECC business day, the appeal on the agenda ~~must be submitted no later than the next WECC business day.~~

The WSC shall not schedule a project for Board approval until the window for submitting an appeal of the ~~next regularly scheduled WSC meeting. If the appellant does not concur with the WSC's findings,~~ the approval of the project has expired.

The Director of Standards will attempt resolution with the appellant ~~may request that.~~ If resolution cannot be reached, the ~~DOS~~ Director of Standards will forward the matter appeal to the ~~Board~~ WSC for disposition. The WSC's decision may be appealed to the Board. The Board's decision may not be appealed.

If the appeal is based on due process concerns, the appellant shall submit the matter to the DOS no later than 30 days after the alleged occurrence of the due process violation, but in no case shall an appeal on due process grounds be accepted more than 30 days after the RRS or OP has been approved by the Ballot Pool. The appeal shall be submitted to the DOS who shall place the appeal on the agenda of the next regularly scheduled WSC



~~meeting. If the appellant does not concur with the WSC's findings, the appellant may request that the DOS forward the matter to the Board for disposition.~~

~~The filing of an appeal shall not halt the development process; however, the appeal shall be settled by the Board before the Board votes to approve the RRS or OP.~~

## Step 11 – Obtain Board Approval

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~~The WSC shall provide the Board with the RRS or CRT, associated supporting documents as needed, the final ballot results, and a summary of the rationale supporting any negative votes cast. The documents will be posted for Board review for at least the period mandated by the WECC Bylaws. The Board shall consider the RRS or ~~OP~~CRT for approval no later than ~~at~~ its next regularly scheduled meeting after ~~the close of the Ballot Pool window and recommendation~~presentation by the WSC with a request for approval ~~by the WSC, subject to the notice requirements in the WECC Bylaws.~~~~

Any person or entity may submit comments to the Board for the Board's consideration. The Board shall consider: the full development record when making its decision.

- ~~0) All comments submitted for its consideration;~~
- ~~0) The WSC's recommendations and minority opinions, if any;~~

- ~~0) All comments that were not incorporated into the RRS or OP;~~
- ~~0) Voting results including, at a minimum, the final ballot results and any rationale supporting negative votes; and~~
- ~~0) Any other supporting documentation.~~

If ~~an OPa CRT~~ is approved by the Board, WECC shall post the final ~~OPCRT~~ on its website and the SAR will be deemed complete. The effective date will be that approved by the Board.

If an RRS is approved by the Board, WECC shall forward the RRS to NERC with a request for NERC approval and FERC subsequent regulatory disposition, as needed.

If the RRS or ~~OPCRT~~ is ~~not approved~~ rejected by the Board, the Board may either deem the SAR complete or remand the RRS or ~~OPCRT~~ to the DT with specific guidance as to proposed changes.

If the RRS or ~~OPCRT~~ is remanded, any Substantive Changes ~~must~~ shall be vetted in accordance with these Procedures. Under no circumstances shall the Board make Substantive Changes to the RRS or ~~OPCRT~~, except in accordance with ~~its backstop authority as authorized by the WECC Bylaws~~ terms on Regulatory Directives set forth herein.

## **Step 12 – Submit ~~RRSs for ERO Review, NERC and FERC Approval~~ &and Implementation of ~~WECC Regional Reliability Standards~~**

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Note: Step 12 only applies to RRSs.

All new, revised, or retired RRSs shall be submitted to NERC ~~for NERC~~ and then FERC for approval. The approval, revision or retirement of an RRS shall not be effective in the United States until approved by FERC and shall not be effective in another jurisdiction until approved by the applicable governmental authority.

## **Step 13 – Retire ~~an OPa CRT~~**

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~~Upon determining~~The WSC may retire all or a portion of a CRT on its own initiative and with no further due process on a finding ~~that the subject matter of an OP~~each of the following criteria has been met:

- ~~1) The substance of the document is duplicated~~addressed in a NERC Reliability Standard, ~~and that retirement of the OP~~other WECC Criteria, supporting WECC documents, or other regulatory document; and
- ~~2) Retirement of the CRT will not cause a reliability gap after the effective date of,~~

~~Proposed retirement of a CRT under this section shall be noticed to the associated NERC Reliability Standard, the WSC may retire a WECC OP on its own initiative without further due process. SEL for no less than 14 days and vetted during at least one WSC meeting.~~

## Step 14 – Submit a Request for Interpretation

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~~A Request for Interpretation (RI) of a document developed under these Procedures is limited to clarifying existing requirements in the approved document and may not expand upon a requirement or provide guidance on how to implement a requirement.~~

~~The RI is initiated by submitting WECC's online SAR form. The SAR shall: 1) identify the specific document; 2) identify the requirement within that document for which an~~

~~interpretation is being requested, and 3) specify the perceived lack of clarity. The SAR shall indicate the material impact to the requesting entity or others caused by the perceived lack of clarity.~~

~~The RI is processed using~~ A valid request for interpretation (RI) is one that requests additional clarity about one or more requirements in approved RRSs or CRTs, but does not request approval as to how to comply with one or more requirements. A valid RI response provides additional clarity about one or more requirements, but does not expand on any requirement and does not explain how to comply with any requirement. Any entity that is directly and materially affected by the reliability of the North American Bulk-Power System may request an interpretation of any requirement in any RRS or CRT that has been adopted by the NERC Board of Trustees or the WECC Board, respectively. Interpretations will only be provided for currently effective documents or those that are approved and have a future effective date.

An RI may only seek to clarify or interpret the requirements of the affected document, including, if applicable, any attachment referenced in the requirement being clarified. No other elements of the affected document are subject to interpretation.

The entity requesting the interpretation shall submit a SAR, or its successor form, as provided on the WECC website. The RI shall explain the clarification required, the specific circumstances surrounding the request, and the impact of not having the interpretation provided. The WECC Standards Department shall review the RI to determine whether it meets the requirements for a valid interpretation. Based on this review, the WECC Standards Department shall make a recommendation to the WSC whether to accept the RI for development.

For example, an RI may be rejected where it:

- 1) Requests approval of a particular compliance approach;
- 2) Identifies a gap or perceived weakness in the approved RRS or CRT;
- 3) Can be addressed by an active standard drafting team;
- 4) Requests clarification of any element of an RRS or CRT other than a Requirement;
- 5) Asks a question has already been addressed in the record;
- 6) Identifies an issue and proposes the development of a new or modified RRS or CRT, (such issues should be addressed via submission of a SAR);
- 7) Seeks to expand the scope of an RRS or CRT; or
- 8) The meaning of an RRS or CRT is plain on its face.

If the WSC rejects the RI, it shall provide a written explanation for rejecting the interpretation to the requesting entity within 10 days of the decision to reject. If the WSC accepts the interpretation request, the WSC shall assemble an interpretation drafting team (IDT) to address the request.

Development of the interpretation shall follow the same process set forth in these Procedures steps as those for developing an RRS or CRT, with the following exceptions:

- The chair of the WSC shall ~~assemble an Interpretation Drafting Team (IDT), either assign members of the original DT or solicit nominees for an IDT for approval by the WSC, or both.~~ The IDT shall be composed of SMEs with relevant expertise to address the clarification and, to the extent ~~possible~~practical, should include members of the original DT. The IDT shall not include any ~~team member~~person representing the entity that filed the RI; however, this prohibition does not preclude representatives of the filing entity from participating in the development process.
- Once an interpretation of an RRS has been approved by the Board, the interpretation shall be appended to the RRS and interpreted document. For an RRS, the interpretation shall be submitted to NERC for NERC and FERC approval.
- The interpretation will remain appended to the ~~RRS~~interpreted document until such time as the ~~RRS~~document is revised and the interpretation's content ~~is~~can be addressed during the revision process. RRS interpretations shall not be effective in the United States until approved by FERC and shall not be effective in other jurisdictions until approval by the applicable governmental authority.
- If, during its deliberations, the IDT identifies a reliability gap in the affected document, the IDT shall notify the WSC of its conclusion and may submit a SAR with the proposed modification to the affected document at the same time it provides its proposed interpretation.

## Supporting Processes

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### Expedited Process for Urgent Action

In cases requiring urgent action, such as in the development of emergency procedures, any person or entity may propose an interim RRS or ~~OP~~OPCRT for approval by the WECC Board. The RRS or ~~OP~~mustCRT may go through a process that eliminates any or all of the steps outlined previously, but only to the extent deemed necessary by the Board and only in a manner that is consistent with the WECC Bylaws.

If the Board approves the interim document, it shall establish an initial effective date for the interim document.

Within 90 days after the initial effective date of the document, the Board shall either:

- 1) Cause a SAR to be submitted requesting the development under these Procedures of a permanent replacement to the interim document; or
- 2) Shall extend the applicability of the interim document for an additional 90 days.

~~Renewal may occur~~The extension can be renewed more than once, but a good faith effort must be made to develop a permanent replacement under these Procedures.

If a SAR is submitted, the interim RRS or OPCRT shall remain in effect until the permanent replacement RRS or OPCRT becomes effective.

If a SAR is not submitted and the interim RRS or ~~OPCRT~~ has not been extended, the interim RRS or ~~OPCRT~~ shall be deemed retired.

## Regulatory Directives

These Procedures acknowledge that FERC may order WECC to make specified regulatory changes to documents created under these Procedures. For the purpose of this section only, those documents are referred to as Directive Regional Reliability Standards (DRRS).

If the Board determines that these Procedures failed to result in a DRRS meeting the mandated regulatory changes, the Board shall have authority to take the following actions to ensure that the DRRS is responsive to the regulatory directive.

~~2.1.~~ If the Ballot Pool approves a DRRS that does not address a regulatory directive required to be included in that document, the Board may remand the DRRS to the original DT or instruct the WSC to convene a new or augmented DT to redraft the document. The Board shall instruct the DT on the specific regulatory directive that must be contained in the redraft. Once the DRRS is redrafted it shall be reprocessed under these Procedures.

~~4.2.~~ If the Ballot Pool rejects a DRRS or fails to ballot the DRRS due to failure to reach a quorum, either when first presented for ballot or during an iterative redraft as instructed by the Board, the Board shall review the DRRS, including all comments provided and all rationale accompanying any negative vote.

- Upon a finding that the DRRS was rejected for reasons not related to the regulatory directive, the Board may direct WECC staff to file a new SAR with the specific narrow scope of addressing only the regulatory directive. The Board may suggest specific language for inclusion in the proposed DRRS.
- Upon a finding that the DRRS was rejected based on language addressing the regulatory directive, the Board shall take the following steps to meet its regulatory obligation:

~~2)1)~~ Review the entire record of development.

~~3)2)~~ Require a public technical conference to be noticed and convened to determine whether the rejected DRRS is:

- ~~just and reasonable;~~

- not unduly discriminatory or preferential;
- in the public interest;
- helpful to reliability;
- practical;
- technically sound;
- technically feasible;
- cost justified; and





The WSC shall ensure that each RRS and each CRT is reviewed at least once every five years from the effective date of the most recent version of the RRS document under review. If the review identifies needed changes, the WSC shall cause a remedial SAR to be filed. If the review does not identify needed changes, ~~the WSC shall communicate its decision via the SEL and~~ no further action will be required.

~~Review of OPs shall be conducted in accordance with internal WECC policies and procedures.~~

### 3.2 Field Tests

WECC will follow a process for field tests or collection and analysis of data to validate concepts, that is similar to the process identified in the NERC Standards Processes Manual, as may be amended.

Approval for a WECC field test shall be obtained from the WSC with consultation from WECC subject-matter experts, as needed. Approval is neither required from NERC nor is there a requirement to consult NERC subject-matter experts.

When a temporary waiver from compliance with either an RRS or a CRT is requested, WECC shall coordinate the test with the appropriate NERC and WECC compliance sections, respectively, before the test begins.