

November 21, 2014

**VIA ELECTRONIC FILING**

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

**RE: Errata to Petition of the North American Electric Reliability Corporation for Approval of Amendments to The Bylaws and the Regional Reliability Standards Development Procedure of the Western Electricity Coordinating Council, Inc.  
Docket No. RR14-8-000**

Dear Ms. Bose:

On September 16, 2014, the North American Electric Reliability Corporation (“NERC”) filed a Petition for Approval (“Petition”) of Proposed Amendments to the Bylaws and the Regional Reliability Standards Development Procedure (“RSDP”) of the Western Electricity Coordinating Council, Inc. (“WECC”) with the Federal Energy Regulatory Commission (“Commission”). Since submittal of the Petition, WECC has made two minor revisions to the RSDP to correct clerical errors, both of which are the subject of this filing.

In Step 14 of the RSDP as attached to the Petition, a clause was erroneously inserted that instructed the Drafting Team to make a recommendation to the Standing Committee for retirement of certain documents. NERC noted WECC’s recognition of this discrepancy and WECC’s intention to correct the problem in a later filing in footnote 4 of the Petition. Also, an outdated footnote (“footnote 2”) was included in the Table of Contents section. WECC has removed the superfluous clause in Step 14 of the RSDP and the outdated footnote 2, and NERC and WECC have each taken the required procedural steps to obtain necessary approval of these revisions.

Accordingly, NERC requests that the Commission approve the attached revised “Clean” and “Redline” versions of the RSDP.

Respectfully submitted,

*/s/ William H. Edwards*  
William H. Edwards  
Counsel for North American Electric  
Reliability Corporation

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

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 21st day of November, 2014.

*/s/ William H. Edwards*

William H. Edwards  
*Counsel for North American  
Electric Reliability Corporation*

**Attachment 1:**  
Amended Reliability Standards Development Procedures of the  
Western Electricity Coordinating Council  
– Clean version

# RELIABILITY STANDARDS DEVELOPMENT PROCEDURES

## Introduction

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).

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

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

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

### Ballot Body

That body of qualified WECC Members and non-members 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

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.

---

<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) consider and respond to industry comments, participate in forums to help build consensus on draft documents, and perform other tasks as assigned by the WSC.

### **Electric Line of Business**

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 that does not change the scope, applicability, intent of the document, or the actions required by affected entities.

For example, Non-Substantive Changes include, but are not limited to; correcting grammar or sentence structure, typographical or spelling errors, font and formatting, numbering, references, adding an obviously missing word, or rephrasing a statement to improve its 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)**

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

### **Participating Stakeholder**

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 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.

### **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, retirement, or interpretation of an RRS or OP.

### **Standards Briefing**

Any meeting initiated by WECC for the purpose of creating an open forum for discussion and explanation of an RRS or OP, 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, intent of the document, or the actions required by affected entities.

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**

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

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

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**

This document has two dominate sections. The first section describes the development steps for the Normal Process for Regional Reliability Standards and Other Projects. 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:

**Step 1 – Submit and Validate a Standard Authorization Request..... 7**

**Step 2 – Complete SAR and Present to the WSC ..... 7**

**Step 3 – Convene the Drafting Team ..... 8**

**Step 4 –Begin Drafting Phase and Submit Draft to WSC ..... 9**

**Step 5 – Post for Comment..... 10**

**Step 6 – Respond to Comments ..... 11**

**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 RRSs for ERO Review, FERC Approval & Implementation of WECC  
Regional Reliability Standards ..... 16**

**Step 13 – Retire an OP ..... 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 Procedures
- Maintenance of RRSs and OPs Documents

## **Notices**

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. 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 via the SEL(s).

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

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

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, shall be in accordance with the WSC charter as approved by the Board.

## **WECC Standards Voting Sectors**

There are eight (8) Standards Voting Sectors (SVS) in which an 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;
- 3) Marketers and Brokers Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Purchasing-Selling Entities.



- 4) Distribution Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Distribution Providers or Load-Serving Entities;
- 5) 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.

- 6) 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 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.
- 7) 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.
- 8) 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, 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 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 Regional Reliability Standards and Other Projects**

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

Development, revision or retirement of a Regional Reliability Standard (RRS) or Other Project (OP) 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. 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**

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.

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 subject matter sufficiently detailed to clearly define the purpose, scope, impacted parties, requirements and any other information relevant to the proposed RRS or OP.

Once deemed complete by WECC staff, WECC staff shall notify the WSC that the SAR has been received and is complete, and 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. The WSC shall make that determination within 60 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 OP to be developed. The SAR author may be asked to further assist in the development or

---

<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 60<sup>th</sup> 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 Standards Email List (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**

If it accepts a SAR, the WSC may, at its discretion, expand or narrow the scope of the SAR. The WSC shall prioritize the development of the SAR in relation to other RRSs or OPs proposed for development under the Procedures, as may be required based on the volume of requests and resources. If prioritization dictates a postponed starting date, the WSC shall either set a postponed starting date or set a review date upon 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 OP, the WSC shall convene a DT to develop the RRS or OP 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 days of establishing a start date. The WSC may augment or modify 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 associated project development 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**

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 the WECC website for a minimum of 15 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 OP.

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 be more stringent than a continent-wide reliability standard, 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.

An RRS or OP 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 should be avoided.

An RRS or OP may include new definitions of terms that need to be added to the WECC or NERC glossaries. 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 be used. When drafting the applicability section of an OP, use of the NERC Functional Model is not required. Development of an OP should conform to WECC internal policies and practices, unless otherwise specified herein.

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 as needed;
- Prepare supporting documents to support the RRS or OP as needed; and

- Request from the WSC additional time to develop the RRS or OP, if necessary.

## **Step 5 – Post for Comment**

Upon completion of each iterative draft of the RRS or OP, WECC staff shall facilitate the posting of the draft RRS or OP 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, 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 OP and shall be a part of the final record for consideration prior to ballot.

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 of the RRS or OP;
- What action is being taken (e.g., request for 30- or 45-day 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 5:00 p.m. (Mountain).

WECC shall open a Web portal to serve as the sole means of receiving comments on the RRS or OP. 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 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 the DT remains within the scope of the SAR. At any time prior to opening a Ballot Pool, if the WSC concludes that the proposed RRS or OP is not within the scope of the SAR or does not meet other regulatory requirements or directives, the WSC shall either remand the RRS or OP to the DT with a specific explanation identifying the deficiencies that must be remedied, adjust the scope of the SAR, or retain the SAR as drafted and replace the DT.

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**

The DT shall consider all comments submitted in accordance with these Procedures. If the same comment is provided more than once, the DT may provide a single response to all comments that raise the same or a similar concern.

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

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 advise the WSC chair of the DT's progress and request additional assistance as needed.

### **Substantive Changes**

If the DT determines that comments received during any posting warrant a Substantive Change to the language of an RRS or OP, the DT shall consider each comment and redraft the RRS or OP 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, the DT shall be polled at a regularly scheduled and announced DT meeting and asked whether the RRS or OP should be forwarded to the WSC with a recommendation to ballot the document. If the DT concludes by an affirmative majority vote that the RRS or OP should be forwarded to the WSC with a recommendation for ballot, the document will be forwarded accordingly.

### **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 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.

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

Upon completion of the proposed RRS or OPs, the DT shall present the proposed RRS or OPs to the WSC with a request for ballot. The WSC shall address that request no later than its next regularly scheduled meeting.

After receiving a request for ballot, the WSC shall review the RRS or OP 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 is ready for ballot, the WSC shall forward the RRS or OP 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. The results of the WSC's vote to forward the RRS or OP to the Ballot Pool shall be documented. Any WSC member that opposes submittal of the RRS or OP 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 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 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 to the DT with a specific explanation identifying the deficiencies that must be remedied.

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

- 1) Redraft the RRS or OP 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 OP to the WSC for disposition.

## **Step 8 – Convene a Standards Briefing**

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

- Identification of the RRS or OP;
- The time and place of the Standards Briefing; and

- The location of the proposed RRS or OP and related documentation for review.

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

Any individual or entity seeking participation in the ballot of an RRS or OP shall 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.

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.

From the Ballot Body, a discrete Ballot Pool will be formed for each RRS or OP 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. It is the Ballot Pool that votes on RRSs and OPs developed under these Procedures.

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

- 1) Identification of the RRS or OP;
- 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 location of the proposed RRS or OP and related documentation 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 15 days or more than 30 days.

Once notice of a Ballot Pool forming has been dispatched: 1) the ballot window shall commence no sooner than 15 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 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.

Voting on an RRS or OP shall be via electronic voting administered on the WECC website. The default voting window shall be a period of 15 days; however, the window may be held 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.



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 explaining the reason for the negative vote. The statement should include language that would make the RRS or OP 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 majority vote of the Ballot Pool is required for an RRS or OP 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 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 majority has been achieved and whether the RRS or OP 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 OP 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 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, the WSC shall submit the RRS or OP to the Board for approval. The WSC shall provide voting results to the Board, including the final ballot results and any rationale supporting any negative votes cast.

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, 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**

An appeal may be brought on the basis of either a technical (reliability) concern or a due process (procedural) concern.

If the appeal is based on technical grounds, that appeal may be brought at any stage of the development process prior to the opening of a ballot window. 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.

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**

The Board shall consider the RRS or OP for approval no later than at its next regularly scheduled meeting after the close of the Ballot Pool window and recommendation 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:

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

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

If an OP is approved by the Board, WECC shall post the final OP 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 for NERC and FERC disposition.

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

If the RRS or OP is remanded, any Substantive Changes must be vetted in accordance with these Procedures. Under no circumstances shall the Board make Substantive Changes to the RRS or OP, except in accordance with its backstop authority as authorized by the WECC Bylaws.

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

**Note:** Step 12 only applies to RRSs.

All new, revised, or retired RRSs shall be submitted to NERC for NERC and FERC 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 OP**

Upon determining that the subject matter of an OP is duplicated in a NERC Reliability Standard, and that retirement of the OP will not cause a reliability gap after the effective date of the associated NERC Reliability Standard, the WSC may retire a WECC OP on its own initiative without further due process.

## **Step 14 – Submit a Request for Interpretation**

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 the same process set forth in these Procedures with the following exceptions:

- The chair of the WSC shall assemble an Interpretation Drafting Team (IDT). The IDT shall be composed of SMEs with relevant expertise to address the clarification and, to the extent possible, should include members of the original DT. The IDT shall not include any team member 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 submitted to NERC for NERC and FERC approval. The interpretation will remain appended to the RRS until such time as the RRS is revised and the interpretation's content is 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.

## **Supporting Processes**

### **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 for approval by the WECC Board. The RRS or OP must 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 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 OP shall remain in effect until the permanent replacement RRS or OP becomes effective.

If a SAR is not submitted and the interim RRS or OP has not been extended, the interim RRS or OP 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.

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 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.

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

- meets the regulatory directive (hereafter “Just and Reasonable”).
- 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 to NERC 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 it 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. Changes to these Procedures approved by the Board shall be submitted to NERC for NERC and FERC approval.

### **Maintenance of RRS and OPs Documents**

The WSC shall ensure that each RRS is reviewed at least once every five years from the effective date of the most recent version of the RRS. 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.

**Attachment 2:**  
Amended Reliability Standards Development Procedures of the  
Western Electricity Coordinating Council  
– Redline version

# RELIABILITY STANDARDS DEVELOPMENT PROCEDURES

## Introduction

~~This document explains the WECC process for requesting, announcing, developing, revising, withdrawing and approving WECC Standards as defined below (“WECC Standards Process”). The process involves several steps:~~

- ~~• A request to develop a new Standard or revise an existing Standard~~
- ~~• Decision to proceed with development or revision of a Standard and assignment to a Drafting Team~~

~~Public (including members) notification~~

~~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).~~

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

- ~~• These Procedures were established to create the structure for open and transparent due process in the development of WECC RRSs and OPs. These Procedures include, but are not limited to, public notice of intent to develop or revise RRSs and OPs, a Standard~~
- ~~• Drafting stage~~
- ~~• Posting of draft for public comment~~
- ~~• Review of all comments and public posting of decisions reached on each comment~~
- ~~• Ballot Body balloting of the period on the proposed Standard~~
- ~~• Consideration documents, due consideration of comments provided, and a balanced ballot of any appeals~~
- ~~• WECC Board of Directors (Board) decision regarding approval, disapproval or remand of proposed Standard~~
- ~~• Forwarding proposed WECC Reliability Standards to the ERO~~

~~The process for developing and approving WECC Standards includes:~~

~~1. Notification of pending Standard change before a wide audience of all “interested and affected parties” stakeholders.~~

~~The 2. Posting Standard change drafts for all parties to review~~

---

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



~~3. Provision for gathering and posting comments from all parties~~

~~4. Provision for an appeals process — both “due process” and “technical” appeals~~

~~The WECC Standards Committee (WSC) has the responsibility for developing and balloting WECC Standards. The WSC Chair is responsible for ensuring administration of the process and completion of all WSC responsibilities. The WSC is supported by the Standing Committees as well as Drafting Teams that draft the Standards. The WSC, with the support of a Drafting Team and Standing Committees, ensures the Draft Standard is properly reviewed consistent with WECC due process requirements, responses have been provided to comments on the Draft Standard, or the Draft Standard is revised in response to the comments. Board approval signifies that WECC has adopted the Standard. WECC staff has the role of tracking the Standard as it moves through the process and facilitating resolution of issues. In accordance with Section 8.6 of the WECC Bylaws, Participating Stakeholders may participate in Reliability Standard development by joining the Ballot Body and may vote electronically on a Draft Standard.~~

### ~~WECC Bylaws Controlling~~

~~It is the intention of the drafters of the WECC Standards Process that the procedures described herein Procedures shall be interpreted and applied in a manner that is consistent with the WECC Bylaws. Should any conflict arise between this WECC Standards Process the Procedures and the WECC Bylaws arise, the WECC Bylaws will control prevail.~~

### ~~Terms~~

#### Definitions

~~**Ballot Body.** The Ballot Body consists~~

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

#### Ballot Pool

~~That pool of Ballot Body entities that have been determined eligible for registered to vote on a specific document.~~

#### Day

~~All references to days are calendar days. When counting the WECC Standard Voting Sectors described in this Reliability 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 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) consider and respond to industry comments, participate in forums to help build consensus on draft documents, and perform other tasks as assigned by the WSC.

### **Electric Line of Business**

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 that does not change the scope, applicability, intent of the document, or the actions required by affected entities.

For example, Non-Substantive Changes include, but are not limited to; correcting grammar or sentence structure, typographical or spelling errors, font and formatting, numbering, references, adding an obviously missing word, or rephrasing a statement to improve its 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)**

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

**Participating Stakeholder** ~~Development Process and in section 8.5.5.2 of~~

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. ~~The~~ Ballot Body consists of the entities that may vote on Regional Criteria and

### **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, except as otherwise limited by these procedures, 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.

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

~~**Ballot Pool.** The Ballot Pool consists of Ballot Body entities that have opted to vote on a specific Standard. Quorum for voting on a Standard is based on the Ballot Pool.~~

~~**Days.** All references to days in this document refer to calendar days, except as otherwise noted in these procedures.~~

~~**Draft Standard.** A Draft Standard includes any proposed new Standards, revisions to existing Standards, or termination of existing Standards. Draft Standards are introduced by use of Standard Authorization Requests or the Special Procedures for Addressing **Regulatory Directives**, as described in these procedures.~~

~~**Joint Session.** The Joint Session is any collective meeting of the Standing Committees. Such meetings are generally held in conjunction with the regular meetings of the individual Standing Committees.~~

~~**Participating Stakeholder.** A Participating Stakeholder as defined in Section 3.33 of the WECC Bylaws.~~

~~**Standard.** In the context of this document, the term Standard refers to a Regional Reliability Standard or a Regional Criterion.~~

~~form titled *Standard Authorization Request (or “SAR”)*. The form titled) administrated by the WECC Standards/Regional Criteria Request Form approved Department for the purpose of requesting development, revision, retirement, or interpretation of an RRS or OP.~~

### **Standards Briefing**

~~Any meeting initiated by WECC for the purpose of requesting a new Standard, a revision to an existing Standard, or termination of creating an existing Standard.~~

~~**Standing Committee.** The Market Interface Committee (MIC), Operating Committee (OC) or Planning Coordination Committee (PCC).<sup>2</sup>~~

---

<sup>2</sup>In accordance with WECC Bylaws Section 8.5.4, Membership in WECC's Standing Committees is open to all WECC members.

**WECC Standards Committee.** This committee consists of one representative from each of the eight Voting Sectors described in Section 8.5.5.2 of the Bylaws open forum for discussion and a ninth-member who shall be a member of the WECC Board of Directors. The members of the WSC shall be appointed by, and serve at the pleasure of, the Board, in accordance with a charter of the WSC approved by the Board. The chair of the Board shall designate a member of the Board of Directors to serve as the chair of the WSC. The WSC is responsible for determining if a Standard Authorization Request is within the scope of WECC's activities, and overseeing the drafting, comment and voting explanation of an RRS or OP, generally but not exclusively held during the development process for a Standard. The WSC is responsible for taking actions described in the Special Procedures for Addressing Regulatory Directives to ensure compliance with directives issued by the Federal Energy Regulatory Commission (FERC) or Mexican or Canadian regulatory authorities. The WSC shall also oversee the process for responding to requests for interpretations of Standards 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, intent of the document, or the actions required by affected entities.

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**

Any entity that has applied and been accepted for membership in WECC Standards Voting Sectors. For purposes of voting on Standards, and is current in the payment of dues.

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

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**

This document has two dominate sections. The first section describes the development steps for the Normal Process for Regional Reliability Standards and Other Projects. 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:

<b><u>Step 1 – Submit and Validate a Standard Authorization Request.....</u></b>	<b><u>9</u></b>
<b><u>Step 2 – Complete SAR and Present to the WSC .....</u></b>	<b><u>10</u></b>
<b><u>Step 3 – Convene the Drafting Team .....</u></b>	<b><u>11</u></b>
<b><u>Step 4 –Begin Drafting Phase and Submit Draft to WSC .....</u></b>	<b><u>12</u></b>
<b><u>Step 5 – Post for Comment.....</u></b>	<b><u>13</u></b>
<b><u>Step 6 – Respond to Comments .....</u></b>	<b><u>14</u></b>
<b><u>Step 7 – Submit Proposed Draft to the WSC with a Request for Ballot.....</u></b>	<b><u>16</u></b>
<b><u>Step 8 – Convene a Standards Briefing.....</u></b>	<b><u>16</u></b>
<b><u>Step 9 – Form the Ballot Pool and Ballot the Standard.....</u></b>	<b><u>17</u></b>
<b><u>Step 10 – Initiate the Appeals Process – If Needed .....</u></b>	<b><u>22</u></b>
<b><u>Step 11 – Obtain Board Approval.....</u></b>	<b><u>23</u></b>
<b><u>Step 12 – Submit RRSs for ERO Review, FERC Approval &amp; Implementation of WECC Regional Reliability Standards .....</u></b>	<b><u>19</u></b>
<b><u>Step 13 – Retire an OP .....</u></b>	<b><u>24</u></b>
<b><u>Step 14 – Submit a Request for Interpretation.....</u></b>	<b><u>24</u></b>

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

- Expedited Process for Urgent Action
- Regulatory Directivesmembers
- Maintenance of Procedures
- Maintenance of RRSs and OPs Documents

### **Notices**

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. 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 via the SEL(s).

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

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

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, shall ~~vote~~ be in the following eight sectors, accordance with the WSC charter as approved by the Board.

### **WECC Standards Voting Sectors**

There are eight (8) Standards Voting Sectors (SVS) in which an 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.

- 4) 1) Transmission Sector. -This sector consists of Western Interconnection entities registered in the NERC ~~compliance registry~~ Compliance Registry as ~~transmission-owners, transmission operators, transmission service providers, or transmission planners~~ Transmission Owners, Transmission Operators, Transmission Service Providers, or Transmission Planners;
- 2) 2) Generation Sector. -This sector consists of Western Interconnection entities registered in the NERC ~~compliance registry~~ Compliance Registry as ~~generation-owners- or generation operators~~ Generation Owners or Generation Operators;
- 3) 3) Marketers and Brokers Sector. -This sector consists of Western Interconnection entities registered in the NERC ~~compliance registry~~ Compliance Registry as ~~purchasing-selling entities~~ Purchasing-Selling Entities.
- 4) 4) Distribution Sector. -This sector consists of Western Interconnection entities registered in the NERC ~~compliance registry~~ Compliance Registry as ~~distribution providers or load-serving entities~~ Distribution Providers or Load-Serving Entities;

- 5) 5) System Coordination Sector. -This sector consists of Western Interconnection entities registered in the NERC ~~compliance registry as balancing authorities, reserve-sharing groups, planning authorities, resource planners, interchange authorities, and reliability coordinators.~~ Compliance Registry as Balancing Authorities, Reserve Sharing Groups, Planning Authorities/Coordinators, Resource Planners, Interchange Authorities/Coordinators, or Reliability Coordinators.
- 6) ~~End Use Representative Sector.~~ This sector consists of non-registered members of WECC Member Class Four;

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

- 6) 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 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.
- 7) 7) State and Provincial Representatives Sector. -This sector consists of ~~non-~~ registered entities not on the NERC Compliance Registry, but that are WECC members of 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. ~~WECC Member~~ Class Five;
- 8) Other Non-Registered WECC Members and Participating Stakeholders Sector. -This sector consists of ~~consultants or other members of WECC Member Class Seven, or interested stakeholders who qualify for (1) Participating Stakeholder status but are not 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, 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.~~
- 8) If a single entity qualifies for more than one Registered SVS, that entity may register and vote in each Registered SVS for which it qualifies. For example, if a single entity was registered in the NERC ~~compliance registry.~~ 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.

~~For sectors one through five, Western Interconnection 8 represent those entities that perform functions outside the United States, that if conducted in the United States would qualify them for the NERC compliance registries included in these sectors, shall be eligible to vote in the appropriate sector(s), as may be determined by WECC staff.~~

~~Each WECC member or Participating Stakeholder shall have a vote that may be cast in each sector for which the member or stakeholder is eligible as described in Section 8.5.5.4 of the Bylaws.~~

~~Sectors one through five are the *not* registered sectors, and the three non-registered sectors are sectors six through eight. If an entity is eligible for a registered sector, then that entity may be eligible for more than one registered sector. An entity can only be in one non-registered sector. An entity cannot be in both a registered and a non-registered sector. The first five sectors (in the NERC Compliance Registry. Unlike Registered SVSs 1 through 5) shall be in the North American Electric Reliability Corporation (“NERC”) compliance registry, with the exception for entities that perform functions outside the United States that are determined eligible for these voting sectors by WECC Staff in Non-Registered SVSs 6 through 8 are only eligible to register and vote in a single SVS.~~

~~Participating Stakeholders may not vote on Regional Criteria unless the proposed Regional Criteria could result in sanctions to a non-WECC member.~~

## **Normal Process for Regional Reliability Standards and Other Projects**

### **Step 1 – Request To Revise or Develop Submit and Validate a Standard Authorization Request**

~~Requests to develop, terminate, Development, revision or revise retirement of a Regional Reliability Standard will (RRS) or Other Project (OP) shall be submitted to initiated by the WECC staff through the use of filing of the WECC a Standard Authorization Request (“SAR”). Requesters may be by any individual or organization. WECC membership person or entity. A SAR is not a requirement as long as filed by completing the electronic fields of the online WECC SAR form. WECC staff shall review the requester has an interest in electric system reliability or commercial business practices in incoming SAR to ensure it is valid. Once deemed valid, the Western Interconnection SAR shall be immediately posted on the WECC website and notification shall be sent to the SEL.<sup>3</sup>~~

---

<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.



## **Step 2 – Standard Authorization Request Validation and Submission Complete SAR and Present to the WSC**

The SAR will be reviewed for completeness and assigned a tracking number by the 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.

WECC staff. ~~Staff may~~ shall determine within 30 days of receipt whether a SAR is complete. WECC staff may assist with completing the request SAR, or report to the WSC that the SAR is incomplete and request guidance. ~~When complete, the WECC staff will forward the SAR to the WSC. WECC staff will maintain a web-based form that tracks all SARs through the Standard development process, as well as a Standards development tracking log that is posted on the WECC website.~~

The WSC will confer either in person or via conference call within two weeks of receipt of a completed request to determine whether the request is within WECC's scope.

If the WSC

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

Once deemed complete by WECC staff, WECC staff shall notify the WSC that the SAR has been received and is complete, and 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. The WSC shall make that determination within 60 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 OP 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 60<sup>th</sup> day following submittal of the SAR, whichever is longer, to remedy each deficiency identified in the remand, or withdraw the SAR.

If the ~~by majority vote,~~ that a 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 inappropriate, it will prepare and is not appropriate to be undertaken by WECC. If a SAR is rejected, the WSC shall post its explanation and post it for rejection on the WECC website. The party that submitted the SAR, parties subscribing to the WECC standards email list, the Standing Committees, and Board will all be notified of the posting and its location on the WECC website. If the WSC decides to reject a SAR at this stage, such Notification of the WSC's decision shall: 1) be communicated to the SAR author, the Board, and the Standards Email List (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 in accordance with Step 8.

~~Upon ascertaining that a SAR is within the scope of WECC's authority and appropriate, the WSC will select and oversee a Drafting Team formed for the purpose of drafting a Draft Standard. The WSC shall ensure that the Drafting Team includes a composite of individuals having the appropriate planning, operations, and market expertise. Notification of such assignments will be posted on the WECC website and sent to all parties that subscribe to the WECC standards email list. In addition, such assignments will be simultaneously noticed to NERC. The WSC shall ensure that the SAR provides the Drafting Team and WECC a description of the Draft Standard it expects the Drafting Team to draft, and an explanation as to why the Draft Standard is needed.~~

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

If it accepts a SAR, the WSC may, at its discretion, expand or narrow the scope of the SAR. The WSC shall prioritize the development of the SAR in relation to other RRSs or OPs proposed for development under the Procedures, as may be required based on the volume of requests and resources. If prioritization dictates a postponed starting date, the WSC shall either set a postponed starting date or set a review date upon 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 OP, the WSC shall convene a DT to develop the RRS or OP 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 days of establishing a start date. The WSC may augment or modify 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 associated project development website.

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

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

~~The Drafting Team will begin working on the Draft Standard following assignment by the WSC, as directed by the WSC chair. The WSC shall provide a time period for which the Drafting Team should complete the Draft Standard. The WSC chair shall designate a Drafting Team leader who shall be responsible for coordinating the Drafting Team's efforts. Notification of Drafting Team meetings will be posted on the WECC website and sent to all parties that subscribe to the WECC standards email list at least 15 calendar days prior to the meeting. In addition, notification of all Drafting Team meetings will be simultaneously noticed to NERC. These meetings will be open to interested stakeholders. The Drafting Team will facilitate interested stakeholder participation in the discussion in order to encourage understanding of the issues and consensus among the meeting participants. The Drafting Team will work to achieve a consensus recommendation. A consensus recommendation is one that strives to eliminate all well-reasoned objections, but if the Drafting Team determines that it is not possible to accommodate all such points of view, it may proceed to provide a recommendation that is supported by a majority of the Drafting Team members.~~

~~Standard requesters have the right, and are encouraged to-~~  
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 the WECC website for a minimum of 15 days prior to the meeting.

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

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 ~~All WECC Standards will follow a standard format that refers to the "Responsible Entities" included in the NERC Functional Model and includes compliance measures~~

~~according to the WECC standard template. The Drafting Team will include definitions for any terms included in the Draft Standard that need to be added to the WECC glossary.~~

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 be more stringent than a continent-wide reliability standard, 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.

An RRS or OP 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 should be avoided.

An RRS or OP may include new definitions of terms that need to be added to the WECC or NERC glossaries. 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 be used. When drafting the applicability section of an OP, use of the NERC Functional Model is not required. Development of an OP should conform to WECC internal policies and practices, unless otherwise specified herein.

In the course of its ~~review assignment~~, the ~~Drafting Team~~: DT shall, at a minimum:  
will review the-

- Review any preliminary technical assessment provided ~~by~~with the requester; SAR;
- ~~may perform~~Perform or request additional technical studies, ~~if necessary~~; as needed;
- ~~will complete an impact assessment report as part of its evaluation to assess the potential effects of the request~~;
- ~~may prepare additional~~Prepare supporting documents to support the ~~Draft Standard~~RRS or OP as needed; and
- ~~may request~~Request from the WSC additional time to develop the ~~Draft Standard~~RRS or OP, if the ~~Drafting Team believes it is necessary~~.

~~The Drafting Team, upon reaching a determination, by majority vote, on the language for a Draft Standard, shall submit the Draft Standard to the WSC. The Drafting Team shall also supply the WSC with the impact assessment report, any additional technical studies performed, and any other materials that significantly contributed to the Drafting Team's evaluation and drafting of the Draft Standard.~~

## **Step 4 – Draft Standard Posted 5 – Post for Comment-**

Upon completion of each iterative draft of the RRS or OP, WECC staff shall facilitate the posting of the draft RRS or OP 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, 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 OP and shall be a part of the final record for consideration prior to ballot.

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 of the RRS or OP;
- What action is being taken (e.g., request for 30- or 45-day 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 5:00 p.m. (Mountain).

WECC shall open a Web portal to serve as the sole means of receiving comments on the RRS or OP. 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 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 the DT remains within the scope of the SAR. At any time prior to opening a Ballot Pool, if the WSC concludes that the proposed RRS or OP is not within the scope of the SAR or does not meet other regulatory requirements or directives, the WSC shall either remand the RRS or OP to the DT with a specific explanation identifying the deficiencies that must be remedied, adjust the scope of the SAR, or retain the SAR as drafted and replace the DT.

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**

The DT shall consider all comments submitted in accordance with these Procedures. If the

same comment is provided more than once, the DT may provide a single response to all comments that raise the same or a similar concern.

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

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 advise the WSC chair of the DT's progress and request additional assistance as needed.

### **Substantive Changes**

If the DT determines that comments received during any posting warrant a Substantive Change to the language of an RRS or OP, the DT shall consider each comment and redraft the RRS or OP 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, the DT shall be polled at a regularly scheduled and announced DT meeting and asked whether the RRS or OP should be forwarded to the WSC with a recommendation to ballot the document. If the DT concludes by an affirmative majority vote that the RRS or OP should be forwarded to the WSC with a recommendation for ballot, the document will be forwarded accordingly.

### **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 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.

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

Upon completion of the proposed RRS or OPs, the DT shall present the proposed RRS or OPs to the WSC with a request for ballot. The WSC shall address that request no later than its next regularly scheduled meeting.

After receiving a request for ballot, the WSC shall review the RRS or OP 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 is ready for ballot, the WSC shall forward the RRS or OP 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. The results of the WSC's vote to forward the RRS or OP to the Ballot Pool shall be documented. Any WSC member that opposes submittal of the RRS or OP 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 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 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 to the DT with a specific explanation identifying the deficiencies that must be remedied.

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

- 1) Redraft the RRS or OP 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 OP to the WSC for disposition.

## **Step 8 – Convene a Standards Briefing**

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

- Identification of the RRS or OP;
- The time and place of the Standards Briefing; and
- The location of the proposed RRS or OP and related documentation for review.

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

Any individual or entity seeking participation in the ballot of an RRS or OP shall 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.

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.

From the Ballot Body, a discrete Ballot Pool will be formed for each RRS or OP 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. It is the Ballot Pool that votes on RRSs and OPs developed under these Procedures.

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

- 1) Identification of the RRS or OP;
- 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 location of the proposed RRS or OP and related documentation 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 15 days or more than 30 days.

Once notice of a Ballot Pool forming has been dispatched: 1) the ballot window shall commence no sooner than 15 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 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.

Voting on an RRS or OP shall be via electronic voting administered on the WECC website. The default voting window shall be a period of 15 days; however, the window may be held 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.

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 explaining the reason for the negative vote. The statement should include language that would make the RRS or OP 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. Upon receiving the Draft Standard from the Drafting Team, the WSC shall decide whether to: (i) post the Draft Standard provided by the Drafting Team for comment; (ii) further revise or modify the Draft Standard provided by the Drafting Team, then post the WSC's revision for comment; (iii) return the Draft Standard to the Drafting Team for further work, as directed; or (iv) terminate the Standard development activity in accordance with the procedures for rejecting a SAR in Step 2. A majority (greater than 50 percent) vote of the authorized membership of the WSC is required to terminate a Draft Standard at this stage. If the WSC chooses to remand the draft back to the Drafting Team, the WSC chair shall provide the Drafting Team with the committee's reason for the remand and provide further guidance, as necessary. 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.

~~If the WSC chooses to present the Draft Standard for comment, the WSC shall post the initial Draft Standard on the WECC website and provide 45 days for comments. Along with the draft, the WSC will post the impact assessment report and other supporting materials. The Draft Standard will include all mandatory requirements. In addition, the Draft Standard will include measurements, Violation Risk Factors (VRFs), and Violation Severity Levels (VSLs).<sup>4</sup> Notice of this posting and a solicitation for comments on the draft will be sent to all WECC members and all individuals who subscribe to the WECC standards e-mail list. In addition the notification of posting and solicitation for comments will be simultaneously noticed to NERC. The WSC may request input from affected parties regarding their estimated cost to implement the Draft Standard and may use that data to amend an impact assessment report, which will be posted for comment when it becomes available.~~

---

<sup>4</sup> Regional Criteria, which are also to be developed under this Procedure, will not contain VRFs or VSLs which are only necessary for Standards that will be enforceable and for which violations may result in penalties.

~~Members of electric industry organizations may respond through their organizations, or directly, or both. All comments will be supplied electronically and will be posted on the WECC website.~~

### ~~Step 5 — WSC Deliberates on Comments~~

~~The WSC chair is responsible for ensuring that comments are addressed in a timely manner. The WSC may further employ and oversee the Drafting Team for purposes of analyzing and responding to comments. The WSC will post its response to comments on the WECC website within 30 days of the close of the comment period. All parties that submit comments are strongly encouraged to participate in WSC deliberations.~~

~~If the WSC determines, by majority vote, any technical comments including those on the draft or the impact assessment report are significant, it will repeat Steps 3 and 4 as many times as considered necessary to ensure adequate opportunity for interested stakeholder input. All interested stakeholders are strongly encouraged to submit their comments as early in the process as possible. The number of days for comment on each subsequent revision to the Draft Standard will be 30 days.~~

~~A majority vote of the WSC is required to approve submitting the recommended Draft Standard to the Ballot Body for a vote. Balloting results will be documented. All WSC member dissenting voters, as well as others participating in the WSC deliberations, will be encouraged to provide dissenting comments and, if possible, specific language that a party believes would make the Draft Standard acceptable. If the WSC vote fails to capture a simple majority to approve submittal to the Ballot Body for a vote, and there is no apparent way to reach a majority agreement, the WSC will report to and seek guidance from the WECC Board.~~

### ~~Step 6 — WSC Submits Draft Standard for Ballot Body Vote and Ballot Pools Are Established~~

~~The WSC's final Draft Standard will be posted on the WECC website at least 30 days prior to the commencement of the voting window and WECC members and Participating Stakeholders who have joined the Ballot Body<sup>5</sup> will be notified of the WSC's recommendation. The posting will include the final WSC member vote, any dissenting WSC member comments, a summary addressing comments that were not incorporated into the Draft Standard, the impact assessment report and the period of time during which the Ballot Body is scheduled to vote on the WSC's recommendation.<sup>6</sup> Notice of the posting also will be sent to the Standing Committees, all Participating Stakeholders,~~

---

<sup>5</sup> Each WECC Member and Participating Stakeholder shall be permitted to designate a person who is authorized to join Ballot Pools for Standards and to either cast a vote within those Ballot Pools or designate a proxy to cast the vote of the WECC Member or Participating Stakeholder. Each such designated person shall be provided a user name and password for use in electronically identifying that entity's authorization to act within the Ballot Body. The Ballot Body will be renewed every five years as part of WECC's section 4.9 review.

<sup>6</sup> The period of time the vote is scheduled shall take into account the next scheduled Joint Session of the Standing Committees.

and the standards email list. In addition, the notification of the posting for ballot will be simultaneously noticed to NERC.

~~After posting of the Draft Standard, the Standing Committees shall participate in at least one Joint Session addressing the Draft Standard. In addition to the Joint Session, individual Standing Committees may undertake additional discussions or webinars.~~

~~The notice shall solicit participants for the Ballot Pool for the final Draft Standard scheduled for a vote. Members of the Ballot Body choosing to vote on the Draft Standard shall respond to the WSC's solicitation for Ballot Pools within a period designated by WECC Staff. Responses from Ballot Body members shall indicate within which WECC Standards Voting Sector(s) the party chooses to vote. Where a WECC member or Participating Stakeholder is eligible for multiple WECC Standards Voting Sectors, it may vote in any or all of its eligible sectors as allowed pursuant to the Bylaws (section 8.5.5.2) and this Reliability Standards Development Process. Based on responses to the Ballot Pool solicitation, WECC staff shall form the Ballot Pool for a particular Draft Standard.~~

### **~~Step 7 – Ballot Pool Vote on Recommendation to Board~~**

~~In accordance with Sections 8.5 and 8.6 of the WECC Bylaws, the Ballot Pool will vote on the Draft Standard. Voting shall begin at least seven (7) calendar days following the Joint Session of the Standing Committees at which the Draft Standard was considered. Voting on Draft Standards shall be via electronic voting administered by the WECC website, and shall take place over a fifteen (15) business day voting window. Each WECC member or Participating Stakeholder may cast one vote in each eligible voting sector. Voters rejecting the Draft Standard will be required to provide an explanation of their vote. Explanations will be added to the record in order to assist the WSC's and/or the Board's subsequent consideration of the Draft Standard.<sup>4</sup>~~

~~A weighted majority vote of the Ballot Pool is required for a Draft Standard an RRS or OP to be approved by the WECC membership and Participating Stakeholders. Voting among the WECC Standards Voting Sectors will be SVSS shall be weighted as follows:-~~

- ~~• For each SectorSVS with ten10 or more voters, the number of affirmative votes cast shall be divided by the sum of the affirmative and negative votes cast to determine the fractional affirmative vote for that Sector. ~~Abstentions, incomplete votes, and non-responses shall not be counted for the purposes of determining the number of voters in the SectorSVS.~~~~
- ~~• For each SectorSVS with less than ten10 voters, the same process shall be used to determine the fractional affirmative vote, but the fractional affirmative vote of that SectorSVS shall be multiplied by ten10 percent (~~10%~~) times the number of voters. ~~E.g.,~~~~
- ~~• For example, for a SectorSVSS with nine voters, the fractional affirmative vote will be multiplied by ninety90 percent (~~90%~~). ~~Abstentions, incomplete votes, and non-responses shall not be counted for the purposes of determining the number of voters in the Sector.~~~~

- ~~The sum of the fractional affirmative votes from all SectorsSVSSs divided by the weighted number of SectorsSVSSs voting shall be used to determine if a weighed majority has been achieved. A Sector and whether the RRS or OP has been approved. An SVS shall be considered as voting if any member of the SectorSVS in the Ballot Pool casts either an affirmative or a negative vote. If there are more than ten voters in the SectorSVS, the weighting used for the calculation of “weighted sectors voting” shall be one hundred100 percent ~~(100%)~~. For SectorsSVSSs with less than ten voters, the weighting used for the calculation of the “weighted sectors voting” shall be ten10 percent ~~(10%)~~ per voter. ~~Abstentions, incomplete votes, and non-responses~~~~
- ~~An RRS or OP shall not be counted for the purposes of determining the number of voters per Sector.~~
- ~~A Standard shall be deemed approved by the Ballot Pool if the sum of fractional affirmative votes from all SectorsSVSSs divided by the weighted number of voting SectorsSVSSs is a majority (i.e., greater than fifty50 percent ~~(50%)~~).~~

~~A two thirds (2/3) quorum of the Ballot Pool is required for each vote. Abstentions and incomplete responses will be counted in determining whether a quorum of the Ballot Pool is achieved. Quorum shall be based on total number of Ballot Pool members, and shall not be based on total number of votes cast. If necessary, the voting window may be extended by the WSC until a quorum is achieved.~~

After a vote by the Ballot Pool, the WSC ~~will~~shall take one of the following actions:~~:-~~

~~(1) If the Ballot Pool approves a Draft Standard an RRS or OP, the WSC shall submit the recommended Draft Standard RRS or OP to the WECC Board ~~for approval~~. The WSC shall provide ~~the Draft Standard, any comments on which the WSC members did not agree, minority opinions of WSC members, explanations supporting votes in opposition to the Draft Standard, and the impact assessment for the Draft Standard~~ voting results to the Board ~~for, including the final approval. To be considered by the Board, ballot results and any rationale supporting any “no” votes by a WSC member on a Draft Standard shall be accompanied by a text explaining the “no” vote and, if possible, should provide specific language~~ negative votes cast.~~

~~Any RRS or OP that would make the Draft Standard acceptable. Relevant voting information from the Ballot Pool shall be submitted to the Board for its consideration in determining whether or not to approve the Draft Standard. Final Draft Standards and all materials was provided to the Board for approval will be posted no less than 30 days prior to the Board vote.<sup>7</sup> ~~The date of the expected Board vote will also be posted.~~ for Board review for at least the period mandated by the WECC Bylaws.~~

<sup>7</sup> WECC Bylaws, Section 7.5.1 — “Except as set forth in Section 7.5.2 regarding urgent business, all regular business of the Board will occur at the Board meetings, at least twenty-one (21) days’ advance notice of which has been provided...”

~~(2) If the Ballot Pool rejects a Draft Standard, the WSC may, by a majority vote (greater than 50 percent of the WSC membership), decide to amend or modify the initial Draft Standard or remand it back to the Drafting Team to amend or modify it. Any amended or modified Draft Standard must be resubmitted to the Ballot Pool for a vote before the WSC submits the subsequent Draft Standard to the WECC Board. If the WSC determines by majority vote (greater than 50% of the WSC members) that the modifications to the Draft Standard could be unanticipated by the Ballot Pool or may be controversial, the amended or modified Draft Standard shall be subjected to an additional Joint Session discussion prior to voting. The reasons for the modification(s) will be documented, posted, and provided to the Board. If any changes are made at the WSC meeting, the roll call of votes for and against the subsequent Draft Standard and abstentions will be recorded at the meeting, and the subsequent Draft Standard will be posted for 10 days for comments. The comments will be posted and distributed to the Ballot Pool and will be made available prior to any subsequent rounds of voting. Unless otherwise directed by the WSC, the Ballot Pool for subsequent votes on a Draft Standard shall consist of the same parties.~~

~~(3) If the Ballot Pool rejects a Draft Standard, the WSC may allow the Draft Standard to terminate.~~

If the Ballot Pool rejects the RRS or OP, 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 8 – 10 – Initiate the Appeals Process – If Needed**

~~Requests for reconsideration of WSC decisions may be made to the WSC. The WSC will post its findings. The subsequent rejection of such a request by the WSC may be appealed to the Board.~~

~~A Draft Standard recommended by the WSC may be appealed on either technical or due process grounds. Any due process or technical appeals must be submitted, in writing, to the WECC staff within 15 days of the date the WSC posts a recommendation.~~

~~An appeal to the Board shall be posted on the WECC website and shall be heard at the Board's next regularly scheduled meeting occurring at least 21 days after the appeal is filed.~~

### **Step 9 – Board Approval**

~~The WECC Board of Directors will consider the proposed Draft Standard no later than at its next meeting occurring at least 30 days after the Ballot Pool vote. The Board will consider the WSC's An~~

appeal may be brought on the basis of either a technical (reliability) concern or a due process (procedural) concern.

If the appeal is based on technical grounds, that appeal may be brought at any stage of the development process prior to the opening of a ballot window. 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.

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**

The Board shall consider the RRS or OP for approval no later than at its next regularly scheduled meeting after the close of the Ballot Pool window and recommendation 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:

- 1) All comments submitted for its consideration;
- 2) The WSC's recommendations and minority opinions, ~~all~~if any;
- 3) All comments that were not incorporated into the ~~draft Standard~~RRS or ~~revision(s)~~OP;
- 4) Voting results including, at a minimum, the final ballot results and the ~~impact assessment report~~. The ~~any~~ rationale supporting negative votes; and
- 5) Any other supporting documentation.

If an OP is approved by the Board, WECC shall post the final OP 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 for NERC and FERC disposition.

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

If the RRS or OP is remanded, any Substantive Changes must be vetted in accordance with these Procedures. Under no circumstances shall the Board make Substantive Changes to the RRS or OP, except in accordance with its backstop authority as authorized by the WECC Bylaws.

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

**Note:** Step 12 only applies to RRSs.

All new, revised, or retired RRSs shall be submitted to NERC for NERC and FERC 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 OP**

Upon determining that the subject matter of an OP is duplicated in a NERC Reliability Standard, and that retirement of the OP will not cause a reliability gap after the effective date of the associated NERC Reliability Standard, the WSC may retire a WECC OP on its own initiative without further due process.

## **Step 14 – Submit a Draft Standard, except to make nonmaterial changes to the language**Request for Interpretation

A Request for Interpretation (RI) of a Standard or revision thereto. If approved, the Standard will be posted on the WECC website and all parties notified.  
~~If the Draft Standard is not approved, the Board may return the Draft Standard to the WSC for further work, or the Board may terminate the Standard activity with an appropriate notice and explanation to the SAR requester, WSC, and participants in the Ballot Pool. These Board actions will also be posted.~~

~~A majority vote of the Directors present at a Board meeting, as specified in Sections 7.2 and 7.4.1 of the WECC Bylaws, is required to approve the recommended Standard.~~

## **Step 10 – ERO Review, FERC Approval and Implementation of Reliability Standards**

~~To the extent required under Section 215 of the Federal Power Act, 18 C.F.R. Part 39, and according to procedures established in the delegation agreement between WECC and the Electric Reliability Organization (“ERO”), the Board shall submit new Reliability Standards, revisions to existing Reliability Standards, and terminations of existing Reliability Standards for review by the ERO and approval by FERC. Upon approval by FERC, the Reliability Standards will be made part of the body of NERC reliability standards and enforced upon all applicable bulk power system owners, operators, and users within the WECC region. Parties’ right to participate in the ERO and FERC review processes shall be as established in the applicable regulations and the ERO/WECC delegation agreement. Reliability~~

~~Standards subject to ERO review shall become effective as approved by FERC or, for entities outside of the U.S. portion of the Western Interconnection, upon approval by the applicable Canadian or Mexican authorities.~~

### ~~Step 11— Implementation of Standards Not Subject to ERO/FERC/Other Approval~~

~~All new and modified Standards not subject to ERO review and FERC, Canadian or Mexican approval as provided in Step 10 shall become effective as ordered by the WECC Board. As of the effective date of such new or modified Standard, all industry participants in the Western Interconnection that such Standard is applicable to are expected to implement and abide by the Standard. Any and all parties to this Process retain the right of appeal to other authorities as the law allows.~~

### ~~Expedited Process for Urgent Action~~ **Interim Standards** document developed under these Procedures

~~In cases requiring urgent action, such as in the development of emergency operating procedures, any Standing Committees or Participating Stakeholders may propose a new or modified interim Standard for approval by the WECC Board through a process that eliminates any or all of the steps outlined above, but only to the extent necessary, and only in a manner that is consistent with the WECC Bylaws. Such interim Standard shall be replaced by a Board-approved permanent Standard, developed using all the steps identified in this document within one year (or such additional time as may reasonably be required to complete all steps) from the date on which the WECC Board approved the interim standard. An interim Standard may be converted to a successor permanent Standard as long as any procedural steps bypassed in developing the interim Standard are completed with respect to the permanent Standard. If necessary, the Board may renew an interim Standard to allow additional time for the development of a successor permanent Standard. Renewal may occur more than once, but a good faith effort must be made to develop a successor permanent Standard.~~

### **Interpretation of Regional Standards and Regional Criteria**

~~Any entity~~ may request an interpretation of a Standard by sending a request through the WECC web portal identifying the Standard and requirement or requirements for which additional clarity is sought. The request shall indicate the material impact to the requesting entity or others caused by the actual or potential lack of clarity. An interpretation is limited to clarifying existing requirements in the approved Standards. Interpretations document and may not be developed that expand upon a requirement or ~~that provide guidance on how to apply~~ implement a requirement. The WECC Staff shall review the request for clarity and completeness and shall work with the requestor to clarify the request or complete any missing elements of the request if needed. The WECC Staff shall forward the request to the WSC. If the WSC believes that the request is intended to change a requirement or is seeking feedback on how to apply a requirement, rather than interpret the requirement, the request shall be denied and returned to the requestor with an explanation. If denied, the requestor shall be advised of the appeals process.

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 the same process set forth in these Procedures with the following exceptions:

#### The chair of the WSC

- Within 21 days of receiving the request, the WSC Chair shall assemble an Interpretation Drafting Team (IDT). The IDT shall be composed of SMEs with the relevant expertise to address the clarification. The IDT and, to the extent possible, should include members from of the original Standard Drafting Team to the extent possible, and may be supplemented as deemed appropriate by the WSC Chair, but shall not contain any members DT. The IDT shall not include any team member representing the entity that submitted the request filed the RI; however, this prohibition does not preclude representatives of the filing entity from participating in the development process.

~~As soon as practicable, but not more than 45 calendar days after the WSC assembles the IDT, the IDT shall draft a written interpretation to the Standard providing the requested clarity. The interpretation shall be posted for a 30-day formal comment period. The IDT shall then have 15 days to respond to the comments and to make any changes to the interpretation. The IDT shall reach a determination on the language for an interpretation by majority vote of the IDT. The IDT shall then return the interpretation to the WSC which shall then post the interpretation for another 30 days to give entities time to review the interpretation prior to a Ballot Pool vote. Notice of this posting will be sent to the Ballot Body, and the notice shall solicit participants for the Ballot Pool for voting on the interpretation. After posting of the interpretation, the Standing Committees shall participate in at least one Joint Session addressing the interpretation. Voting on the interpretation shall be consistent with the quorum and weighted voting procedures explained in Step 7 of these Reliability Standards Development Procedures. Use of a conference call or web meeting and electronic or email balloting is encouraged to shorten the interpretation process. If the interpretation is approved by a weighted majority of the Ballot Pool, the WSC shall forward the interpretation to the WECC Board of Directors for approval. If the Ballot Pool rejects the interpretation, the WSC shall notify the requestor. The WSC shall also ask the IDT to provide a revised interpretation.~~

- Interpretations of Regional Standards shall be

Once an interpretation of an RRS has been approved by the Board, the interpretation shall be appended to the RRS and submitted to NERC for processing with a request that the interpretation be adopted by the NERC Board of Trustees and then filed for approval with and FERC and applicable Governmental Authorities in British Columbia, Alberta and Mexico approval.

- For entities operating in the United States, once the interpretation of a Regional Standard is approved by FERC, the interpretation shall become effective and shall be appended to the Standard. For entities outside of the U.S. portion of the Western Interconnection, interpretations shall become effective for these entities only upon approval by the appropriate Canadian or Mexican regulatory authority. The interpretation will remain appended to the Standard RRS until such time as the Standard is revised through the normal process incorporating the clarifications provided by the interpretation RRS is revised and the interpretation's content is 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.

## **Supporting Processes**

### **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 for approval by the WECC Board. The RRS or OP must 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 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 OP shall remain in effect until the permanent replacement RRS or OP becomes effective.

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

### **Regulatory Directives**

#### **Special Procedures for Addressing ~~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 ~~the WECC Standards Process did not~~ these Procedures failed to result in a proposed Draft Standard that addresses a directive issued by the FERC or by a Mexican or Canadian DRRS meeting the mandated regulatory authority (Applicable Regulatory Authority), hereinafter, "regulatory directive," then ~~changes~~, the Board shall have authority to take ~~certain~~ the following actions to ensure that a Draft Standard the DRRS is responsive to the regulatory directive ~~is drafted, approved and/or submitted to the Applicable Regulatory Authority.~~<sup>§</sup> ~~The Board~~

---

<sup>§</sup> The procedures in this section, "Special Procedures for Addressing Regulatory Directives," only apply to draft Regional Reliability Standards.

~~shall have the authority to choose which one or more of the actions set out below are appropriate to the circumstances and need not take these actions in sequential steps.—~~

~~1. Board Remand to the WSC after an Affirmative Vote of the If the Ballot Pool.—If the Board is presented with approves a Draft Standard~~DRRS~~ that ~~fails to~~does not address a regulatory directive required to be included in that document, the Board may remand to the WSC the proposed Draft Standard with instructions (including establishing a timetable for action).—~~

~~2. Board Remand to WSC for Additional Public Consideration and Re-ballot.—Upon a written finding by the Board that a Ballot Pool has failed to approve a Draft Standard that contains a provision to address a specific matter identified in a regulatory directive, the Board has the authority to remand the Draft Standard to the WSC with instruction to (i) the DRRS to the original DT or instruct the WSC to convene a public technical conference~~new DT to discuss~~redraft the issues surrounding document. The Board shall instruct the DT on the specific regulatory directive, including whether or not the Draft Standard is just, reasonable, not unduly discriminatory or preferential, that must be contained in the public interest, helpful to reliability, practical, technically sound, technically feasible, and cost-justified; (ii) ~~working with WECC staff, prepare a memorandum discussing the issues, an analysis of the alternatives considered and other appropriate matters; and~~ (iii) re-ballot the Draft Standard one additional time, with such adjustments in the schedule as are necessary complete a re-ballot of the Draft Standard within forty-five (45) days of the remand. The WSC memorandum shall be made available to the Ballot Pool in connection with the re-ballot. In any re-ballot, negative votes without comment shall be counted for purposes of establishing a quorum, but only affirmative votes and negative votes with comments related to the Draft Standard shall be counted for purposes of determining the number of votes cast and whether the Draft Standard has been approved by the Ballot Pool.—~~

~~3. Affirmative Vote upon Re-ballot of Draft Standard.—If the re-balloted Draft Standard achieves an affirmative majority vote of the Ballot Pool, with a quorum established, then the Draft Standard shall move to the Board for approval.—~~

~~4. Negative Vote upon Re-ballot of Draft Standard.—If the re-balloted proposed Draft Standard fails to achieve an affirmative majority vote of the Ballot Pool, or if a quorum~~redraft~~. Once the DRRS is not established, then the Board has the authority to consider the Draft Standard for approval pursuant to the following:redrafted it shall be reprocessed under these Procedures.~~

~~(i) The Board—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 issue notice of its intent to consider the Draft Standardreview the DRRS, including all comments provided and shall solicit written public comment particularly focused on the technical aspects of the provisions of the Draft Standardall rationale accompanying any negative vote.~~

~~Upon a finding that address the specific matter identified inDRRS was rejected for reasons not related to the regulatory directive, including 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 or not the Draft Standard rejected DRRS is:

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

~~(ii) The Board may convene a public technical conference to receive additional input on the matter.~~

~~(iii) After considering the developmental record, the comments received during balloting and the additional input received under (i) and (ii), the Board has authority to act on the Draft Standard. If the Board finds that the Draft Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is helpful to reliability, practical, technically sound, technically feasible, and cost-justified, then the Board has authority to approve the Draft Standard and direct that it be filed with the Applicable Regulatory Authority with a request that it be made effective. If the Board is unable to find that the proposed Draft Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is helpful to reliability, practical, technically sound, technically feasible, and cost-justified, then it has authority to direct that the Draft Standard and complete developmental record, including the additional input received under (i) and (ii), be submitted to the Applicable Regulatory Authority, as a compliance filing in response to the order giving rise to the regulatory directive, along with a recommendation that the Draft Standard not be made effective and an explanation of the basis for the recommendation.~~

~~5. Board Approval or Rejection of a Draft Standard Prepared by the WSC or WECC Staff and Not Balloted. Upon a written finding by the Board that the WSC has failed to develop, or a Ballot Pool has failed to approve, a Draft Standard that contains a provision to address a specific matter identified in a regulatory directive, the Board has the authority to direct the WSC (with the assistance of stakeholders and WECC staff) to prepare a Draft Standard that addresses the regulatory directive, taking account of the entire developmental record pertaining to the matter. If the WSC fails to prepare such Draft Standard, the Board may~~

~~direct WECC management to prepare such Draft Standard. As part of this process, the Board may convene a public technical conference to receive input on the matter. The Draft Standard shall be posted for a forty-five (45) day public comment period. After considering the entire developmental record, including any comments received during the public comment period, the Board may do one of the following:~~

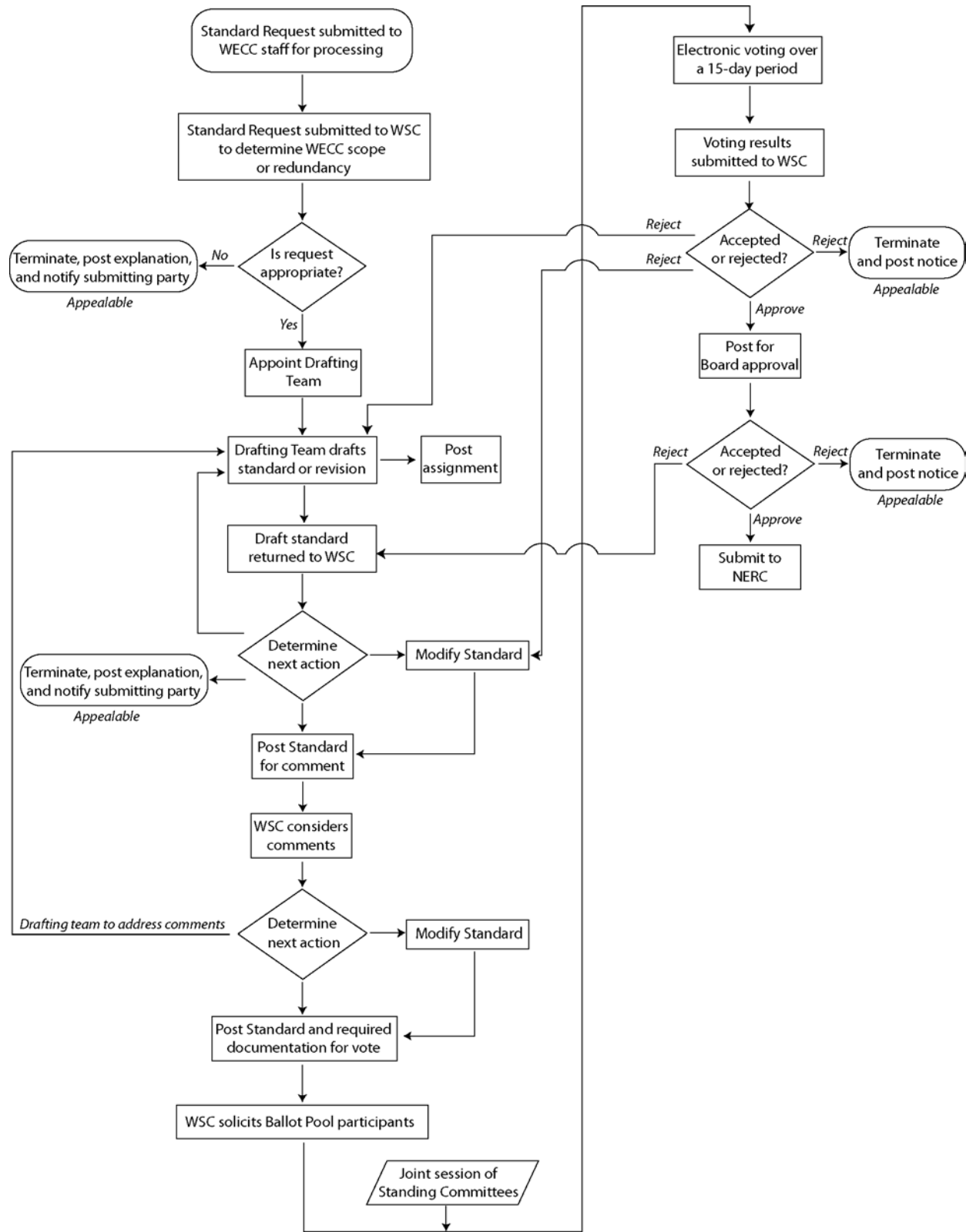
~~(i) The Board may find that the Draft Standard, with such modifications as the Board determines are appropriate in light of the comments received, is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the bulk power system. In this case, the Board has the authority to approve the Draft Standard and direct that the proposed Standard be submitted to the Applicable Regulatory Authority with a request that the Draft Standard be made effective.~~

~~(ii) The Board may be unable to find that the Draft Standard is just, reasonable, not unduly discriminatory or preferential, and in the public interest, considering (among other things) whether it is practical, technically sound, technically feasible, cost-justified and serves the best interests of reliability of the bulk power system. In this case, the Board has the authority to direct that the Draft Standard and the complete developmental record be filed as a compliance filing in response to the regulatory directive with the Applicable Regulatory Authority, with a recommendation that the Draft Standard not be made effective.~~

~~WECC shall on or before January 31st of each year file a report with the FERC on the status and timetable for addressing each outstanding directive to address a specific matter received from FERC.~~

~~Approved by the WECC Board June 22, 2011.~~

## **STANDARDS DRAFTING PROCEDURES FLOWCHART**



• meets the regulatory directive (hereafter “Just and Reasonable”).

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 to NERC 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 it 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. Changes to these Procedures approved by the Board shall be submitted to NERC for NERC and FERC approval.

### **Maintenance of RRS and OPs Documents**

The WSC shall ensure that each RRS is reviewed at least once every five years from the effective date of the most recent version of the RRS. 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.