

Comment Report

Project Name: Regional Reliability Standard (WECC-0101) | MOD-026-2 and MOD-027-2 (WECC Variance)
Comment Period Start Date: 8/10/2016
Comment Period End Date: 9/23/2016
Associated Ballots:

There were 7 sets of responses, including comments from approximately 7 different people from approximately 7 companies representing 5 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree the proposed standard/variance was developed in a fair and open process, using the associated Regional Reliability Standards Development Procedure?
2. Does the proposed standard/variance pose an adverse impact to reliability or commerce in a neighboring region or interconnection?
3. Does the proposed standard/variance pose a serious and substantial threat to public health, safety, welfare, or national security?
4. Does the proposed standard/variance pose a serious and substantial burden on competitive markets within the interconnection that is not necessary for reliability?
5. Does the proposed regional reliability standard/variance meet at least one of the following criteria?
 - The proposed standard/variance has more specific criteria for the same requirements covered in a continent-wide standard.
 - The proposed standard/variance has requirements that are not included in the corresponding continent-wide reliability standard.
 - The proposed regional difference is necessitated by a physical difference in the bulk power system.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc.	1	SERC
					R. Scott Moore	Alabama Power Company	3	SERC
					William D. Shultz	Southern Company Generation	5	SERC
					Jennifer G. Sykes	Southern Company Generation and Energy Marketing	6	SERC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Heather Morgan	EDP Renewables North America LLC	5	SPP RE
					Mike Kidewell	Empire District Electric Company	1,3,5	SPP RE
					Tom Higgins	Southern Company	1,3,5,6	SPP RE
Colorado Springs Utilities	Shawna Speer	1,3,5,6		Colorado Springs Utilities	Shawna Speer	Colorado Springs Utilities	1	WECC
					Shannon Fair	Colorado Springs Utilities	6	WECC
					Charles Morgan	Colorado Springs Utilities	3	WECC
					Kaleb Brimhall	Colorado Springs Utilities	5	WECC

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

Patricia Lynch - NRG - NRG Energy, Inc. - 5,6

Answer No

Document Name

Comment

This wording of this questionnaire is written more as a push poll, rather than seeking honest feedback from the affected members of the industry.

Likes 0

Dislikes 0

Response

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Shawna Speer - Colorado Springs Utilities - 1,3,5,6, Group Name Colorado Springs Utilities

Answer Yes

Document Name

Comment

Colorado Springs Utilities feels the proposed WECC variances do not improve upon or add important requirements to the already approved NERC standards. We believe there will be minimal reliability improvements due to this variance.

Likes 0

Dislikes 0

Response

Janis Weddle - Public Utility District No. 1 of Chelan County - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Johnny Anderson - Johnny Anderson - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Document Name

Comment

We feel that there is not enough information currently present to determine if the process is fair or not.

Likes 0

Dislikes 0

Response

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

Shawna Speer - Colorado Springs Utilities - 1,3,5,6, Group Name Colorado Springs Utilities

Answer No

Document Name

Comment

Colorado Springs Utilities feels the proposed WECC variances do not improve upon or add important requirements to the already approved NERC standards. We believe there will be minimal reliability improvements due to this variance.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Johnny Anderson - Johnny Anderson - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Janis Weddle - Public Utility District No. 1 of Chelan County - 1,3,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
<p>The primary variance to the national standards is the change in frequency of revalidations from 10 years (national) to 5 years (WECC region). WECC has not provided justification for the increased frequency which poses additional financial cost on the GO's in WECC. Additionally, we would ask the drafting team to provide clarity or verification on why the 5 year validation is necessary?</p>	
Likes 0	
Dislikes 0	
Response	
Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	

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

Shawna Speer - Colorado Springs Utilities - 1,3,5,6, Group Name Colorado Springs Utilities

Answer No

Document Name

Comment

Colorado Springs Utilities feels the proposed WECC variances do not improve upon or add important requirements to the already approved NERC standards. We believe there will be minimal reliability improvements due to this variance.

Likes 0

Dislikes 0

Response

Janis Weddle - Public Utility District No. 1 of Chelan County - 1,3,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Johnny Anderson - Johnny Anderson - 1

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Patricia Lynch - NRG - NRG Energy, Inc. - 5,6	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

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

Shawna Speer - Colorado Springs Utilities - 1,3,5,6, Group Name Colorado Springs Utilities

Answer No

Document Name

Comment

Colorado Springs Utilities feels the proposed WECC variances do not improve upon or add important requirements to the already approved NERC standards. We believe there will be minimal reliability improvements due to this variance.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Johnny Anderson - Johnny Anderson - 1

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Janis Weddle - Public Utility District No. 1 of Chelan County - 1,3,5,6

Answer	No
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Patricia Lynch - NRG - NRG Energy, Inc. - 5,6	
Answer	Yes
Document Name	
Comment	
<p>Non base-load boiler-steam generating unit incur significant, uncompensated cost to perform model verification tests, because they require dedicated, unscheduled startups to accomplish and satisfy the specified testing regiment. The variance excessively and unnecessarily micromanages the details of the verification process, placing a limit on the development of more efficient verification methods.</p> <p>The five year periodicity for model verification in WECC was developed at a time when most voltage regulators were analog. With the development and widespread use of digital AVR's and integrated DCS controllers, 5 year frequency is costly, unnecessary, and unjustified; the 10 year interval is more than adequate. Also, the existing requirement to perform model verification for changes in the AVR or turbine governors is sufficient.</p>	
Likes	0
Dislikes	0
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
<p>The primary variance to the national standards is the change in frequency of revalidations from 10 years (national) to 5 years (WECC region). WECC has not provided justification for the increased frequency which poses additional financial cost on the GO's in WECC.</p>	
Likes	0
Dislikes	0
Response	

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

- The proposed standard/variance has more specific criteria for the same requirements covered in a continent-wide standard.
- The proposed standard/variance has requirements that are not included in the corresponding continent-wide reliability standard.
- The proposed regional difference is necessitated by a physical difference in the bulk power system.

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer No

Document Name

Comment

PacifiCorp does not support any variance that introduces obligations that are more onerous than the NERC MOD-026-1/MOD-027-1 requirements. PacifiCorp believes that all regions should adhere to the MOD-026-1/MOD-027-1 reliability standards as currently written and enforceable nationwide.

Likes 0

Dislikes 0

Response

Janis Weddle - Public Utility District No. 1 of Chelan County - 1,3,5,6

Answer Yes

Document Name

Comment

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

The WECC variance reduces the NERC 10-year requirement to 5 years, which is in line with the existing policy and not, of itself, unduly burdensome. However, the existing WECC policy provides for an exemption for when a planned governor or AVR/PSS replacement is to occur. Under the exemption, the GO provides a timeline for when equipment will be replaced and validated. *The variance does not include this exemption provision.* How this could work in practicality for Chelan PUD is that we would have to validate a unit, and then under existing schedules, have to revalidate it a year or so later when a governor or exciter is replaced. This equates to as many as three validations in a ten year period where at most, the NERC standard would require one. This seems an undue burden that does not improve BES reliability.

Likes 0

Dislikes 0

Response

Shawna Speer - Colorado Springs Utilities - 1,3,5,6, Group Name Colorado Springs Utilities	
Answer	Yes
Document Name	
Comment	
Colorado Springs Utilities feels the proposed WECC variances do not improve upon or add important requirements to the already approved NERC standards. We believe there will be minimal reliability improvements due to this variance.	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Johnny Anderson - Johnny Anderson - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Patricia Lynch - NRG - NRG Energy, Inc. - 5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	