

Attachment R2
WECC-0126 PRC-004-WECC-2

Protection System and Remedial Action Scheme Misoperation
NERC Response to Comments / Posting 1
November 3 through December 18, 2017

Posting 1

The WECC-0126 PRC-004-WECC-2, Protection System and Remedial Action Scheme Misoperation (DT) thanks everyone who submitted comments on the proposed project.

Posting

This document was posted for a 45-day public comment period at the North American Electricity Reliability Corporation (NERC) from November 3 through December 18, 2017.

On November 3, 2017, NERC distributed notice of the posting via the NERC Standards Announcements email exploder.

NERC received comments from four entities as shown in the following table.

Location of Comments

All comments received on the project can be viewed in their original format on the WECC-0126 project page under the “Submit and Review Comments” accordion. Additionally, the raw data provided to WECC by NERC in support of this filing is appended to this response form.

Changes in Response to Comment

No changes were made to the project based on the comments received during this posting.

Minority View

There were no minority concerns.

Effective Date and Implementation Plan

The Reliability Standards Development Procedures (Procedures) require that an implementation plan be posted with at least one posting of the project. After completing its review, the DT recommends that the substance of PRC-004-WECC-2 should be retired immediately and in its entirety because the reliability-related substance is addressed in peripheral NERC Standards. The DT does not believe any further actions are necessary to implement the proposed changes.

Action Plan

As of January 10, 2018, this project is awaiting filing at NERC.

Comment Report Form for WECC-0126

Contacts and Appeals

If you feel your comment has been omitted or overlooked, please contact [W. Shannon Black](#), WECC Consultant. In addition, the WECC Reliability Standards Appeals Process can be found in the Reliability Standards Development Procedures.

Comment Report Form for WECC-0126

WECC Standards Comment Table

Commenter		Organization
1	Aaron Cavanaugh	Bonneville Power Administration (BPA)
2	John Tolo	Tucson Electric Power Company (TEP)
3	Laurie Williams	PNM Resources - Public Service Company of New Mexico (PNM)
4	Glen Farmer	Avista

Index to Questions, Comments, and Responses

Questions

1. Do you agree the development of the Regional Reliability Standard met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:
2. Do you agree the development of the Regional Reliability Standard met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:
3. Do you agree the development of the Regional Reliability Standard met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:
4. Do you agree the development of the Regional Reliability Standard met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:
5. Do you agree the development of the Regional Reliability Standard met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:

Comment Report Form for WECC-0126

1. Response Summary

Summary Consideration:	See summary in the preamble of this document.		
Commenter / Comment			Response
<p>The WECC-0126 PRC-004-WECC-2, Protection System and Remedial Action Scheme Misoperation Drafting Team thanks each party for their continued support and dedication to the standards development process.</p> <p>All respondents answered in the affirmative on all questions.</p> <p>There were no minority opinions nor were there requests for modification.</p> <p>No changes were made to the project.</p>			

**Raw Data
provided by
NERC
Comment
Report**

Project Name: Regional Reliability Standard (WECC) | PRC-004-WECC-2 Retirement

Comment Period Start Date: 11/3/2017

Comment Period End Date: 12/18/2017

Associated Ballots:

There were 4 sets of responses, including comments from approximately 4 different people from approximately 4 companies representing 4 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree the development of the Regional Reliability Standard met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:

2. Do you agree the development of the Regional Reliability Standard met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:

Comment Report Form for WECC-0126

3. Do you agree the development of the Regional Reliability Standard met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:

4. Do you agree the development of the Regional Reliability Standard met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:

5. Do you agree the development of the Regional Reliability Standard met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
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1. Do you agree the development of the Regional Reliability Standard met the “Open” criteria as outlined above? If “No”, please explain in the comment area below:	
John Tolo - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3	
Answer	Yes

Comment Report Form for WECC-0126

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Comment Report Form for WECC-0126

2. Do you agree the development of the Regional Reliability Standard met the “Inclusive” criteria as outlined above? If “No”, please explain in the comment area below:

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3

Answer Yes

Document Name

Comment

Likes 0

Comment Report Form for WECC-0126

Dislikes	0
Response	
John Tolo - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

3. Do you agree the development of the Regional Reliability Standard met the “Balanced” criteria as outlined above? If “No”, please explain in the comment area below:

John Tolo - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3	
Answer	Yes

Comment Report Form for WECC-0126

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Comment Report Form for WECC-0126

4. Do you agree the development of the Regional Reliability Standard met the “Due Process” criteria as outlined above? If “No”, please explain in the comment area below:

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3

Answer Yes

Document Name

Comment

Likes 0

Comment Report Form for WECC-0126

Dislikes	0
Response	
John Tolo - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

5. Do you agree the development of the Regional Reliability Standard met the “Transparent” criteria as outlined above? If “No”, please explain in the comment area below:

John Tolo - Unisource - Tucson Electric Power Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1,3	
Answer	Yes

Comment Report Form for WECC-0126

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Comment Report Form for WECC-0126