July 15, 2025th, 2025

NORTH AMERICAN STANDARDS BOARD

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Submitted via email to NAESB office ([naesb@naesb.org](mailto:naesb@naesb.org))

Comments Concerning NAESB WEQ BPS Western Interconnection Congestion Management Working Group Request for Informal Comment

Seattle City Light (City Light) appreciates the NAESB WEQ BPS Western Interconnection Congestion Management Working Group’s transparency and receptiveness to feedback and comment. Thank you for accepting and considering the following comments.

Section XXX-1: Should *ERA* be replaced with *WELR*?

Section XXX-1.3: Suggest adding phrase to “The RC shall ensure that WELR logs specifying the details associated with the initiation of WELR procedure are available, subject to applicable confidentiality requirements *regardless of the procedure used to achieve that relief.”*

Section XXX-1.8:

Comment: ECC is a tool that contains and uses the Production Network Model. The entity in charge of maintaining the ECC / Production Network Model is the entity that would need to “make available…”

Comment: Some entities may consider this information Critical Energy/Electric Infrastructure Information. Some form of need to know and non-disclosure should be applied.

Suggested wording:

XXX-1.8. The ECC Production network model shall be made available by (XXX Entity / Controlling Entity) under their policies and procedures for sharing modeling information subject to applicable confidentiality requirements.

Seattle City Light thanks NAESB for accepting and considering these comments

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Seattle City Light

cc: