

Summary of Comments Received on Proposed 06/05/2018 Draft Updates to Western Area Power Administration's (WAPA) Meter Policy Business Practice and WAPA Responses

Western Area Power Administration (WAPA) received several comments regarding the proposed 06/05/18 Draft Business Practice (BP) update to its Meter Policy. The significant comments are summarized below, with WAPA's responses, if any, noted. Based upon the comments, WAPA agrees to incorporate additional proposed updates to clarify or address certain of the comments received as described below and as set forth in the 07/12/18 Final version of the BP.

Given the minor (permissive) nature of the changes made by WAPA, the updated 7/12/18 version of the BP is being posted as "Pending" and will become "Effective" on 7/20/18. A REDLINE showing all of the minor changes between the 06/05/18 posted CLEAN version and the 07/12/18 version is posted for information.

- 1. Comment:** Propose that WAPA lower the threshold for the magnitude of generation for which WAPA requires real time data. In Section 15.2, that the >1 MW threshold be lowered to ≥ 450 kW.

WAPA Response: WAPA reviewed this recommendation, but chose not to implement the proposed change during this update of the BP.

- 2. Comment:** Propose that in Sections 11.1 & 12.3 : 1) ANSI C57.13.6 standard specifies 0.15% accuracy PTs & CTs (see attached) which is in conflict with the 0.3% accuracy mentioned in section 11.1 & 12.3. ANSI C57.13 covers 0.3% accuracy PTs & CTs.

WAPA Response: WAPA appreciates the comment and made changes to Sections 11.1 and 12.3 to clarify that customers are allowed to use .15% accuracy PTs and CTs.

- 3. Comment:** Propose in Section 12.4 : 1) Maybe add a reference to ANSI C57.13.6 standard in this section, and 2) Can the CT burden rating be less than B1.8 if a burden

calculation is performed proving a B0.9 or B0.5 rating is sufficient for a specific installation? For dry-type CTs there is a trade-off between the burden rating and the rating factor. Reducing the burden rating can increase the rating factor which is desirable in some installations.

WAPA Response: WAPA appreciates the comment and made changes to Section 12.4 to allow the CT burden rating be less than B1.8 to provide additional customer flexibility (with WAPA review and approval), but does not require it.

4. **Comment:** WAPA received a number of recommended ministerial “clean-up” recommendations.

WAPA Response: WAPA appreciates the comments and made the various “clean-up” changes throughout the document.