October 13, 2025

**North American Energy Standards Board (NAESB)**  
Attn: WEQ Business Practices Subcommittee  
Email: naesb@naesb.org

**Subject:** Public Comment on R24005 – WEQ Western Interconnection Loading Relief (WLR) Business Practice Standards

Dear WEQ Business Practices Subcommittee Members,

I appreciate the opportunity to provide comments on the proposed **WEQ-XXX Western Interconnection Loading Relief (WLR)** Business Practice Standards developed under the 2025 WEQ Annual Plan Item 1.b / Standards Request R24005.

As a Senior Director leading outage management and grid reliability software development at **PCI Energy Solutions**, I support the intent of the WLR initiative to establish a uniform, flow-based, real-time congestion management framework for the Western Interconnection. This is a timely and essential step to ensure equitable, data-driven, and transparent management of transmission congestion across regional boundaries.

To enhance implementation efficiency and interoperability with existing utility systems, I respectfully offer the following recommendations:

1. **Integration with Outage and Scheduling Platforms:**  
   Clarify expectations for data exchange between the Enhanced Curtailment Calculator (ECC) and existing outage management, tagging, and scheduling systems to prevent data discrepancies between curtailment actions and outage statuses. This will help align WLR relief obligations with existing operational processes and real-time situational awareness tools.
2. **Validation of the 5% Impact Threshold:**  
   Support adoption of the proposed 5% impact threshold, but recommend establishing a review mechanism to periodically evaluate whether the threshold optimally balances precision with operational efficiency. This ensures that ECC-driven relief obligations remain actionable without causing undue complexity or excessive curtailments.
3. **Transparency and Auditability:**  
   Suggest incorporating requirements for timestamped ECC decision logs and traceable event histories. This audit trail would improve transparency and enable post-event validation, strengthening stakeholder trust and compliance assurance.

These enhancements would reinforce the WLR process as a reliable, interoperable, and equitable framework that supports evolving reliability coordination and market integration needs across the Western Interconnection.

Thank you for your continued leadership and for the opportunity to comment on this important initiative.

Respectfully submitted,

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