



Western Interstate Energy Board/ WINB

August 27, 2007

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Douglas C. Larson
Executive Director

The Honorable Joseph T. Kelliher, Chairman
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Via Fax and U.S. Mail

Dear Chairman Kelliher:

The Commission has begun an examination of a narrow element of the Western Systems Power Pool agreement (ER91-195-000 and EL07-69-000). While likely outside the scope of the existing docket, the Committee on Regional Electric Power Cooperation (CREPC) recommends that the Commission consider amending reporting requirements for transactions under the WSPP agreement to require immediate reporting of transactions. This reporting requirement would not apply to bi-lateral transactions within Canada that do not require the transmission of electricity across the international border.

At present, power sales under the WSPP agreement are reported to FERC 30 days after the end of a quarter with the result that the information is between 30 and 120 days old. This reporting time lag limits the usefulness of the data for market monitoring. If there are concerns over the rapid public release of data, FERC could hold the information confidential for 30 days while giving the FERC market monitoring staff immediate access.

The immediate reporting of sales under the WSPP agreement would provide valuable information by which to monitor the bi-lateral market in the Western Interconnection. As you know, all power sales in the U.S. portion of the Western Interconnection outside the California ISO market are bi-lateral contracts. Information on bi-lateral markets is significantly less robust than in organized markets.

For some time, Western states and provinces have been very interested in improving the monitoring of the Western power market. In 2006, CREPC, working

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with the Lawrence Berkeley National Laboratory, completed the attached report on a regional approach to market monitoring in the Western Interconnection. The level of cooperation between western states and the FERC market monitoring staff continues to improve. The immediate reporting of sales under the WSPP agreement would be an important step toward improving the market monitoring capabilities of FERC and the states' and provinces' understanding of Western power market performance.

Thank you for consideration of our request.

Sincerely,

A handwritten signature in black ink that reads "John F. Savage". The signature is written in a cursive, flowing style.

John Savage, Chairman
Committee on Regional Electric Power Cooperation

cc: John Moot, General Counsel
Shelton Cannon, Director, Office of Energy Markets and Reliability

Attachment