



# Western Interconnection Regional Advisory Body

November 24, 2006

Alberta  
Arizona  
British Columbia  
California  
Colorado  
Montana  
Idaho  
Nevada  
New Mexico  
Oregon  
South Dakota  
Utah  
Washington  
Wyoming

**John Savage**  
Chair

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

*Via Federal Express:*

Dear Chairman Kelliher:

In the attached document, the Western Interconnection Regional Advisory Body (WIRAB), pursuant to Section 215(j) of the Federal Power Act, advises the Commission that the Western Electricity Coordinating Council's (WECC's) Reliability Centers be funded under Section 215 and that alternatives for funding the Reliability Centers are discriminatory and contrary to the public interest. We advise that the Commission should grant WECC's request for rehearing.

The WIRAB advice was unanimously approved by the 14 representatives of the Governors and Premiers of Alberta, Arizona, British Columbia, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, South Dakota, Utah, Washington and Wyoming.

WIRAB believes that the Federal Power Act does not prevent the Commission from authorizing Section 215 funding for WECC's Reliability Centers. Mandatory funding of critical reliability functions is what Congress had in mind when it enacted Section 215 to ensure that the reliability of the bulk-power system was not dependent on voluntary actions of market participants.

Since the major western blackouts in the summer of 1996, the West has implemented measures to protect against future cascading blackouts. We created the Reliability Management System and three Reliability Centers. Beginning in 1997, the Western Governors, who were central players in the

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enactment of Section 215, began aggressively supporting the enactment of federal legislation to ensure that these voluntary measures would become mandatory.

WIRAB strongly urges you to reconsider your October 24 decision denying statutory funding for Western Interconnection Reliability Centers and to carefully evaluate the consequences of this decision on the reliability of the Western Interconnection.

Sincerely,

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

John Savage, Chairman  
Western Interconnection Regional Advisory Body

Attachments:

WIRAB Advice

cc: WIRAB members  
John Moot, General Counsel  
Joe McClelland, Director, Division of Reliability  
Rick Sergel, CEO, North American Electric Reliability Council  
Louise McCarren, CEO, Western Electricity Coordinating Council  
Pam Inmann, Executive Director, Western Governors' Association