



# Western Interconnection Regional Advisory Body

October 16, 2007

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*Washington*  
*Wyoming*

*John Savage*  
*Chair*

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

Dear Chairman Kelliher:

The Western Interconnection Regional Advisory Body (WIRAB) submits the attached advice (Advice) to the Federal Energy Regulatory Commission (FERC) regarding its Notice of Proposed Rulemaking (NOPR) on critical infrastructure protection (CIP) reliability standards under docket No. RM06-22-000.

We apologize for failing to meet the filing deadline but, during our deliberations on the NOPR, a fundamental issue arose about the process to change proposed reliability standards.

We believe that unilateral FERC directives to the North American Electric Reliability Corporation (NERC) to make changes to proposed standards violates the principles of the Bilateral Electric Reliability Organization Group and could result in different standards in Canada, Mexico, and the United States. Changes to the standards should only be made through a process in which there is ample and adequate coordination with Canadian and Mexican authorities, such as the NERC standards development process. Therefore, we advise that the Commission remand the proposed CIP standards to NERC with guidance as to the kinds of changes it would like to see but without direction to make any specific change so that the Electric Reliability Organization (ERO) standards development process has a chance to work as anticipated by the discussions of the Bilateral Electric Reliability Organization Group. We believe that letting the process work is the best way to avoid the intractable problem of different standards or different levels of enforcement on different sides of an international border.

The WIRAB Advice was unanimously approved by the 16 representatives of Alberta, Arizona, British Columbia, California, Colorado, Idaho, Montana, Nevada, New Mexico, Nebraska, Oregon, South Dakota, Utah,

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Washington, Wyoming, and Mexico.

As always, WIRAB would be pleased to discuss our views on this topic in the future.

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

Attachment:  
WIRAB Advice