

Western Interconnection Regional Advisory Board 2010 Work Plan

Assumptions

This draft work plan covers a 12-month period, from January 1, 2010 through December 31, 2010. A quarterly schedule of past and future proposed actions is attached to this work plan. The schedule will be updated on a regular basis. The proposed schedule for WIRAB action items is based on currently available information and may change as new developments arise, priorities change, and WIRAB develops experience carrying out its responsibilities.

I. 2010 Work Plan by Topics

A. Advice to FERC, NERC and WECC

- Standards Development and Implementation
 - Monitor standards development and approval at FERC, NERC and WECC.
 - Monitor the application of the definition of an “adequate level of reliability” to standards development.
 - Monitor proposed changes to the definition of the Bulk Electric System (BES) or the Bulk Power System (BPS).
 - Identify any promising approaches to evaluating the cost-effectiveness of standards.
 - Explore alternative approaches to burgeoning number of standards and requirements that will simplify enforcement and improve reliability.
 - Monitor compliance and enforcement of the June 18, 2007 FERC-approved standards, any subsequent NERC-proposed, FERC-approved standards, including any approved WECC regional standards.
 - Examine trends in violations in the Western Interconnection.
 - Monitor the violation appeals process.
 - Monitor issues raised by Registered Entities at the October 30, 2008 WIRAB meeting and in the Compliance Users Group and Western Interconnection Compliance Forum.¹

¹ Key points raised by panel of Register Entities at the October 30 joint WIRAB/CREPC meeting

- WECC should use the audit process to build capacity at companies and WECC staff should be more responsive to company inquiries
- WECC/NERC should make very conservative interpretations of standards and use the standards development process to deal with expansive interpretation issues
- Roles and responsibilities of NERC and the regions are not clear
- Companies don't understand rules of the road; inconsistencies among regions
- Real-time FERC demands during a disturbance hindering response

- Monitor standards interpretation process to determine if interpretation process is being used to address issues better addressed through the standards setting process.
- Monitor issues at the nexus of integration of variable generation and standards, criteria, policies and practices.
- Provide advice to WECC, NERC and FERC on:
 - Any new proposed standards²
 - Improvements in the implementation of standards.
- Fees and Budgets Under Section 215
 - Advice to WECC Board on its proposed 2011 budget.
 - Advice to NERC on its proposed 2011 budget.
 - Advice to FERC on the consolidated NERC/Regional Entity proposed 2011 budgets.
- Delegation Agreement
 - Monitor implementation of the NERC-WECC delegation agreement
 - Potential advice to WECC, NERC and/or FERC on any potential areas of improvement in the implementation of the delegation agreement.
- Monitor the implementation of WECC's two new Reliability Centers which became operational in January 2009 including potential additional uses for data and analysis tools currently available to RCs and which may be available under "smart grid" initiatives.
- Evaluate WECC and NERC resource adequacy assessments.
 - Review consistency of data used in NERC's Long-Term Reliability Assessment (LTRA), WECC's Power Supply Assessment, WECC's transmission expansion planning, and WECC's power flow studies used to demonstrate compliance with TPL standards 001-004.
 - Provide advice to NERC and WECC on appropriate scenarios to evaluate in the 2010 and 2011 LTRA that would make the assessments most valuable to decision-makers in Western states and provinces and Mexico.
 - Review the quality of assessments and provide advice on improved approaches to the assessments.
- Monitor NERC and WECC policies on data confidentiality.
- Monitor international collaboration in standards development and enforcement and other grid reliability activities.
- Monitor implementation of WECC's five-year Strategic Plan.

² On September 18, 2008, NERC filed its Reliability Standards Development Plan for 2009-2010. Numerous standards are expected to be proposed by 2010, including Balancing Authority Controls (2007-06), System Protection (2007-08), Disturbance Monitoring (2007-11), Frequency Response (2007-12), Protection System Maintenance and Testing (2007-17), and Reliability Based Control (2007-18).

- Monitor and, as appropriate, offer advice on the follow-up to the three-year review of the performance of NERC and WECC being undertaken in response to FERC's order, FERC's audit of WECC, and the review of WECC required by Section 4.9 of the WECC Bylaws.
- Explore with FERC what assistance states, particularly state PUCs, can offer to improve the cyber security preparedness of western companies, including potential FERC assistance to companies to review cyber security measures.
- Monitor and provide advice on proposed new emergency cyber security regulations.
- Monitor WECC actions in response to Class 5 recommendations made at WECC annual meetings.

B. WIRAB Board Operation

- Hold regular meetings with FERC staff and/or Commissioners.
- Coordinate with WECC and NERC on receipt of revenues to support the 2010 WIRAB budget.
- Develop the 2011 WIRAB budget.
- Execute annual audit of WIRAB finances.

C. Meetings and Technical Conferences

- Attend all WECC Board meetings.
- Attend WECC committee and subcommittee meetings on germane issues.
- Attend WECC workshops on system operations and standards.
- Attend some, but not all NERC Board meetings and NERC Member Representatives Committee meetings.
- Attend selected NERC meetings and workshops on relevant topics.
- Monitor all FERC meetings by webcast.
- Attend by webcast or in person FERC technical conferences on reliability issues.
- Participate in WECC's Compliance Hearing Body activities.
- Invite FERC to in-person WIRAB meetings
- Annually visit with FERC in their offices

D. Compliance Monitoring

- Review audit reports on Western entities.
- Review trends in violations.
- Observe example audits.

E. WIRAB Educational Seminars and Webinars

- Hold briefings and webinars for WIRAB members and other western state and provincial officials on reliability issues important to regulatory commissions and energy agencies in the Western Interconnection.

II. Action Items and Schedule (action and who will do it)

Below is a table tracking historical and proposed WIRAB actions since October 1, 2006. It includes information on 2010 activities, as best as can be identified at this time. The table will be regularly updated to reflect proposed new actions and the status of implementing activities.

Action Items and Schedule (action and who will do it)	Status as of May 2009
<i>3rd Quarter 2006</i>	
Advice to FERC on Notice of Proposed Rulemaking on NERC's April 4 filing of proposed reliability standards. WIRAB.	July 25, 2006 WIRAB advice to FERC on standards and transmittal letter .
<i>4th Quarter 2006</i>	
Attend WECC Board meeting and technical session on standards. Oct. 4-6. WIRAB staff and interested members.	Completed
Attend NERC workshop on reliability standards in Dallas. Oct. 19-20. WIRAB staff and interested members.	Completed
Advice to FERC on NERC's August 28 filing of 27 new or revised proposed reliability standards. WIRAB.	January 3, 2007 WIRAB advice to FERC on proposed approval of reliability standards and transmittal letter
Advice to FERC on the proposed 2007 budgets filed by WECC and NERC. WIRAB.	October 6, 2006 WIRAB advice to FERC on fees and budget proposal and transmittal letter . November 27, 2006 WIRAB advice to FERC on funding Western Reliability Coordinators and transmittal letter
Advice to FERC on NERC's proposed budget principles. WIRAB.	Part of October 6, 2006 WIRAB advice to FERC on fees and budget proposal and transmittal letter
Advice to NERC and WECC in developing a delegation agreement. WIRAB.	Advice not offered. See advice to FERC below.
Advice to FERC on a filed WECC-NERC delegation agreement. WIRAB.	January 10, 2007 WIRAB advice to FERC on proposed WECC-NERC delegation agreement and transmittal letter

Identify and invite Mexican representative to join WIRAB. WIRAB staff.	Completed, Mexico is a WIRAB member
Complete processing of eligible State and Provincial representatives. WIRAB staff.	Completed, all states and provinces with territory in the Western Interconnection are members of WIRAB
Hold meeting with FERC staff and/or Commissioners. WIRAB staff and members.	Meeting held 2/9/07
Coordinate with WECC and NERC receipt of revenues to support 2007 WIRAB budget. WIRAB staff.	Completed
Develop an on-line system to track status of proposed standards. WIRAB staff.	Not completed and may not be needed in light of NERC's Reliability Standards Development Plan 2007-09
Attend WECC Board meeting December 6-8. WIRAB staff and interested members.	Completed
<i>1st Quarter 2007</i>	
Advice to NERC on WECC Tier 1 standards. WIRAB	February 08, 2007 WIRAB advice to NERC regarding regional reliability standards filing by WECC and transmittal letter
Advice to FERC on RC funding. WIRAB	March 12, 2007 WIRAB advice to FERC regarding statutory funding of Western Reliability Centers and transmittal letter
Review compliance audits and readiness evaluations on Western entities. WIRAB staff.	Not completed
Observe readiness audits and compliance audits. WIRAB staff.	Not completed
Prepare discussion paper on quantifying the economic benefits and costs of reliability standards. WIRAB staff.	Deferred. Webinar on NERC's definition of an "adequate level of reliability" held in 1 st quarter of 2008
<i>2nd 2007</i>	
Hold annual WIRAB face-to-face meeting	Completed April 4
Attend WECC Board meeting April 24-27, 2007. WIRAB staff and interested members.	Completed
Advice to WECC Board on its proposed 2008 budget. WIRAB.	Incorporated into advice to FERC on WECC 2008 budget
Develop and approve the 2008 WIRAB budget. WIRAB staff and WIRAB.	Completed
Hire WIRAB staff person. WIRAB staff and chairman	Job opening posted; interviews conducted; offers made; salary offers not

	competitive; search continuing
3rd Quarter 2007	
Attend WECC Board meeting July 25-27. WIRAB staff and interested members.	Completed
Advice to NERC on its proposed 2008 budget. WIRAB.	Incorporated into advice to FERC on consolidated FERC and Regional Entity budgets
Hold a workshop with western utilities on the implementation and cost-effectiveness new mandatory reliability standards. WIRAB staff.	Postpone to 2008 when there is more experience with standards enforcement Panel of Registered Entities at 10/30/08 WIRAB meeting
Begin monitoring WECC/NERC standards enforcement process. WIRAB staff and WIRAB.	WECC compliance briefings held on each WIRAB conference call meeting. No final violations made public yet.
Begin participation in WECC Compliance Hearing Body activities. WIRAB staff and WIRAB members.	No hearings held yet
Begin monitoring development of new ATC standards. WIRAB staff	
4th Quarter 2007	
Advice to WECC on RC implementation. WIRAB	December 17, 2007 WIRAB advice to FERC regarding the RCC Charter
Attend WECC Board meeting October 3-5, 2007 and December 5-7, 2007. WIRAB staff and interested members.	Completed
Advice to FERC on NERC's proposed consolidated proposed 2008 budget. WIRAB.	September 21, 2007 WIRAB advice to FERC regarding the 2008 NERC consolidated budget
Hold a workshop for state/provincial consumer offices on the costs and impacts of new mandatory reliability standards. WIRAB.	Postpone to 2008 when there is more experience with standards enforcement Panel of Registered Entities at 10/30/08 WIRAB meeting
Prepare discussion paper on structuring risk-based reliability standards. WIRAB staff.	Deferred. Webinar on NERC's definition of an "adequate level of reliability" held in 1 st quarter of 2008
Provide advice to FERC on new NERC proposed standards. WIRAB.	October 16, 2007 WIRAB advice to FERC regarding the CIP NOPR and transmittal letter

<i>1st Quarter 2008</i>	
Monitor WECC implementation of RC initiative. WIRAB staff and WIRAB.	February 4, 2008 WIRAB advice to NERC on WECC's 2008 amended budget and transmittal letter February 29, 2008 WIRAB advice to FERC on amendments to 2008 business plan and budget of WECC and transmittal letter
Review trends in violations. WIRAB staff and WIRAB.	No violations public yet
Hold face-to-face meeting with FERC staff. WIRAB staff and interested WIRAB members.	Completed February 7, 2008
Provide WECC with advice on future assessments (e.g., resource adequacy, transmission expansion). WIRAB	January 24, 2008 WIRAB advice to WECC on transmission expansion study request and transmittal letter
Review WECC's proposed 2009 budget and, as needed, provide advice to WECC. WIRAB staff and WIRAB.	September 22, 2008 WIRAB advice to FERC on consolidated 2009 NERC and Regional Entity budgets
<i>2nd Quarter 2008</i>	
Approve a 2009 WIRAB budget. WIRAB.	Completed
Review NERC's proposed 2009 budget and, as needed, provide advice to FERC. WIRAB staff and WIRAB.	September 22, 2008 WIRAB advice to FERC on consolidated 2009 NERC and Regional Entity budgets
Attend WECC annual meeting April 16-18 in San Diego. WIRAB staff and interested WIRAB members.	Completed
Providing advice to FERC on new NERC proposed standards. WIRAB.	On-going
Hold the mandatory WIRAB annual face-to-face meeting. WIRAB.	Held April 2-3 in San Diego
Potential Advice to WECC/NERC on LTRA scenarios. WIRAB.	June 3, 2008 WIRAB advice to NERC on LTRA
<i>3rd Quarter 2008</i>	
Attend WECC Board meeting August 13-15, 2008. WIRAB staff and interested WIRAB members.	Completed
Attend WECC Board meeting October 1-3, 2008. WIRAB staff and interested WIRAB members.	Completed
Provide advice to NERC on proposed WECC regional standards	October 24, 2008 WIRAB advice to NERC on WECC revised Tier 1 standards
Provide advice to FERC on new NERC proposed standards. WIRAB.	On-going

4th Quarter 2008	
Complete independent audit of WIRAB expenses in FY 2007-08. WIRAB staff.	Completed
Attend WECC Board meeting December 10-12, 2008. WIRAB staff and interested WIRAB members.	Completed
Provide advice to FERC on new NERC proposed standards. WIRAB.	On-going
Initiate discussion with industry, consumer advocates, others on WIRAB value added. WIRAB.	
Hold second face-to-face WIRAB meeting. WIRAB	Joint WIRAB/CREPC meeting included briefing on standards compliance process and a panel of Registered Entities at 10/30/08 WIRAB meeting
1st Quarter 2009	
Review operational status of WECC RCs due to come on-line in January 2009. WIRAB staff and WIRAB.	Briefed by WECC staff in January and February WIRAB calls.
Hold face-to-face meetings with FERC to discuss the: volume of violations; dysfunctional regional standards process; improvements in regional transmission planning; archiving ATC data; audits; timely feedback to registered entities; alternative approaches to the current micromanagement approach to standards and enforcement; and state/provincial role in improving cyber security and assistance FERC can provide companies in identifying needed cyber security improvements. WIRAB members and staff.	Held meetings with FERC staff and Commissioners Kelly, Moeller, and Wellinghoff March 9, 2009.
WIRAB webinar on WECC findings from WIRAB's requested study of low-carbon transmission expansion scenario	Deferred to 3 rd quarter 2009
Advice to FERC on revised WECC Tier 1 standards. WIRAB	Awaiting NERC filing of standards with FERC
Attend February 9 NERC Board and MRC meeting	Completed
Potential WIRAB advice on first three-year review of NERC and WECC performance	March 2, 2009 Advice to NERC on draft Three Year Assessment
Improve links from WIRAB links web page to specific topic areas on redesigned WECC and NERC web sites	Awaiting redesigned WECC web site
2nd Quarter 2009	
Potential advice to WECC/NERC on 2009 LTRA scenarios. WIRAB.	
Attend April 29-30 WECC Board meeting. WIRAB staff and interested WIRAB members.	Completed
Hold webinar on June 18 on PG&E renewable	

integration tool	
Hold webinar on June 24 on NERC renewable integration work	
Approve a 2010 WIRAB budget. WIRAB.	
Hold the mandatory WIRAB annual face-to-face meeting. WIRAB.	
<i>3rd Quarter 2009</i>	
Advice to FERC on NERC and Regional Entity consolidated budget request. WIRAB.	
Attend July 29-31 WECC Board meeting. WIRAB staff and interested WIRAB members.	
Hold webinar on WECC study of WIRAB low-carbon transmission expansion scenario	
Attend October 21-23 WECC Board meeting. WIRAB staff and interested WIRAB members.	
Review DOE EPAct Section 1221 transmission congestion study to identify any reliability concerns in the Western Interconnection. WIRAB staff.	
<i>4th Quarter 2009</i>	
Attend December 9-11 WECC Board meeting WIRAB staff and interested WIRAB members.	
Complete independent audit of WIRAB expenses in FY 2008-09. WIRAB staff.	
<i>1st Quarter 2010</i>	
Hold face-to-face meetings with FERC. WIRAB staff and interested WIRAB members.	
Attend NERC Board and MRC meeting	
<i>2nd Quarter 2010</i>	
Attend WECC Board meeting. WIRAB staff and interested WIRAB members.	
Approve a 2010 WIRAB budget. WIRAB.	
Hold the mandatory WIRAB annual face-to-face meeting. WIRAB.	
<i>3rd Quarter</i>	
Attend July WECC Board meeting. WIRAB staff and interested WIRAB members.	
Advice to FERC on NERC and Regional Entity consolidated budget request. WIRAB.	
Attend October WECC Board meeting. WIRAB staff and interested WIRAB members.	
Hold a face-to-face meeting of WIRAB. WIRAB	
<i>4th Quarter 2009</i>	
Attend December WECC Board meeting WIRAB staff and interested WIRAB members.	
Complete independent audit of WIRAB expenses in FY	

2008-09. WIRAB staff.	
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