

(Revised 10-02-07)

Summary of September 21, 2007 WIRAB Meeting

The following members participated in the September 21, 2007 Western Interconnection Regional Advisory Body (WIRAB) meeting and constituted a quorum:

Alberta	Ian McKay/Bevin Laing
Arizona	Lori Faeth
British Columbia	Ed Higginbottom
California	Bill Chamberlain
Colorado	Morey Wolfson / Jeff Hein
Idaho	Marsha Smith
Montana	Chad Krutar / Tom Kaiserski
Nebraska	Tim Texel
Nevada	Rebecca Wagner
New Mexico	Joanna Prukop
Oregon	John Savage
South Dakota	Brian Rounds
Washington	Tony Usibelli / Mark Anderson

Also present were Louise McCarren/Mark Maher/Steve McCoy (WECC), Pat Van Midde (SDG&E), Dilip Mahendra (SMUD), Rob Taylor (Salt River Project) and Doug Larson/Tom Carr (WIRAB).

Approval of the August 13, 2007 Meeting Summary

Rebecca Wagner (NV) moved and Bill Chamberlain (CA) seconded a motion to approve the draft summary of the August 13 WIRAB meeting. Motion was approved.

Public Comment

No public comments were received

WECC Compliance Report [[presentation](#)]

Steve McCoy, WECC Director of Compliance, provided a snapshot of WECC compliance activities:

- New Developments
 - Expect to see an increase in compliance investigations prompted by vegetation outages across several regions. NERC is seeking additional information to address these problems.
 - WECC formed a [Compliance User Group](#) that will meet quarterly to discuss topics and share information. A kickoff meeting was held in August with about 250 attending. WECC staff provided updates on new

forms and procedures. The next meeting is scheduled in December in San Francisco. This meeting will feature a half day session where registered entities can compare notes and discuss matters without WECC compliance staff present. There will also be two days of training including a compliance 101 workshop and a power system operations course.

- WECC set up a new [Compliance website](#) and is working on developing a web portal.
- NERC has developed [Vendor List](#) that identifies consultants that can offer services for responsible entities. The list is a service and not intended to be a recommendation for any particular vendor.
- Registration
 - [Entity Registration](#) in the WECC region now totals over 525 entities. There are about 30 disputes over entity registration. One important dispute issue concerns the load serving entity (LSE)/ distribution providers (DP) with transmission lines under 100 kV that are located in the Northwest within the Bonneville Power Administration balancing area. WECC intends to examine the material impact of these cumulative entities over the next few months.
 - Another new issue concerns transmission operators (TOP) that are not registered and which connect generation to the grid on facilities with ratings of 500 kV and 230 kV.
- Compliance violations
 - The number of pre-June 18 violations in the WECC regions was 3,143 (includes about 200 when self-reporting started) and there are 3,108 violations currently open. The number of post-June 18 violations is 397 self-reported violations and 276 are currently open (includes about 106 non-sanctionable qualifying facility violations). About 600-700 open violations are actually completed but the documents have not been fully reviewed. McCoy expects that many of these violations will be closed out by the end of this year or the first quarter of next year.
 - No fines have been assessed yet. WECC has not been able to issue formal violation notice letters because of a hang up on the penalty calculation. The penalty calculation in part depends upon an assessment of the entity's internal compliance program. NERC is trying to complete an audit sheet on the elements of an internal compliance program. FERC has reviewed spreadsheet penalty calculator and offered comments. Recently, WECC developed its own definition of an internal compliance program. WECC will be using its audit sheet in audits of BAs and TOPs.
- Mitigation plans
 - WECC received 3,104 pre-June 18 mitigation plans with 2,702 accepted and 402 rejected. As for post-June 18 mitigation plans, WECC received 225 with 213 accepted and 9 rejected. WECC has received mitigation plans for all violations that require a mitigation plan.
 - The most common reason that WECC rejected mitigation plans occurred when an entity submitted a mitigation plan and stated that it didn't know if

it violated a standard. WECC rejects such plans because there must be a violation to have a mitigation plan.

- NERC has committed to FERC to have all pre-June 18 mitigation plans reviewed by November 1.

Advice on 2008 NERC Budget

Doug Larson presented a draft of proposed WIRAB advice to FERC on the NERC 2008 consolidated budget. The draft advice identified five issues: (1) approval of the budget in light of enforcement cost uncertainties; (2) treatment of WECC budget reserves; (3) endorsement of features in the NERC budget development process; (4) instructions to NERC to engage states in reliability adequacy assessments; and (5) avoiding misuse of regional entity metrics. Bill Chamberlain (CA) suggested a clarification to the title of issue 2. Tony Usibelli (WA) proposed that the recommendation in issue 5 request that FERC ask NERC to provide illustrations on how metrics might be used.

Usibelli moved and Chamberlain seconded a motion to adopt the revised advice. The motion was approved. Staff was instructed to revise and file the advice at FERC.

Advice on CIP NOPR

Tom Carr discussed a WIRAB staff issue paper on FERC's notice of proposed rulemaking (NOPR) on critical infrastructure protection (CIP) reliability standards. The deadline for comments on the NOPR is October 5. Carr identified four issues that WIRAB may wish to develop advice to FERC: (1) the appropriateness of performance based standards for cyber security standards; (2) whether CIP standards should include a provision allowing for "reasonable business judgment"; (3) whether "technical feasibility" is an appropriate exception; and (4) whether some standards should include an "acceptance of risk" exception. Jeff Hein (CO) will email suggested comments. John Savage clarified that there is no general dispute over the 8 standards and inquired about alternative to the proposed reasonable business judgment standard.

Staff was instructed to develop a draft advice for the CIP NOPR and distribute the draft advice to WIRAB on September 26. WIRAB will review and vote on the draft advice on October 2.

WECC Update

Bill Chamberlain (CA) provided an update on WECC activities:

- WECC is in the process of developing a strategic plan. Bill offered to provide a briefing package to interested WIRAB members.
- Tier 1 standards are being revised at WECC. A proposal for reserve standards that do not rely on a definition of load responsibility has been proposed and is

scheduled to be considered for approval by the WECC Operating Committee in March and if approved, by the Board in April.

- At an October meeting, the Operating Committee will be considering important issues about the WECC Reliability Center (RC) program such as the number of RCs, the functionality of RCs, governance, and reporting relationship to WECC. The decisions of the Operating Committee will inform the Board's consideration at a meeting in December.

NERC Update

Doug Larson attended a NERC conference on resource reliability assessment on August 16 in Chicago. NERC is moving towards an expansive view of resource adequacy that may broaden the current scope undertaken by WECC's resource adequacy analysis.

FERC Update

Tom Carr reported that the Commission announced two organizational restructuring steps at its September 20 meeting. The Office of Reliability was created to carry out reliability work under Section 215 of the Federal Power Act. Joe McClelland will head the new Office of Reliability. A new Energy Innovations section will address emerging issues such as demand response, energy efficiency, and renewable energy.

FERC issued a NOPR on August 13 for three new reliability standards (FAC-010-1, FAC-011-1 and FAC-014-1) that concern system operating limits. Comments on the NOPR were due September 19. The NOPR raised specific questions about how WECC may revise and update its own regional standards on this topic. WECC filed comments on the NOPR that identify WECC's process and guidelines developed in its Seven Step Process for Performance Category Upgrade Requests.

WIRAB Update

Larson reported that electrical engineer position at WIRAB remains unfilled and that the recruitment continues.

Next WIRAB Call

The next WIRAB conference call will be held on Monday, October 29 at 1:30 p.m. PDT / 2:30 p.m. MDT / 3:30 p.m. CDT.