

**Draft**  
**Summary of March 26, 2007 WIRAB Meeting**

The following members participated in the March 26, 2007 Western Interconnection Regional Advisory Body (WIRAB) conference call meeting and constituted a quorum:

Alberta	Ian McKay
California	Bill Chamberlain
Idaho	Marsha Smith
Nevada	Rebecca Wagner
New Mexico	Joanna Prukop
Oregon	John Savage
South Dakota	Brian Rounds
Washington	Tony Usibelli
Wyoming	Steve Ellenbecker

Also joining the call were Tim Texel, Nebraska, Keith White, California PUC, Pat Van Midde, SDG&E, Eric Olson, Navigant, and Doug Larson/Tom Carr (WIEB).

Summary of February 26, 2007 WIRAB Meeting

Joanna Prukop (NM) moved approval of the draft [summary of the February 26, 2007 WIRAB meeting](#). Tony Usibelli (WA) seconded the motion which was approved.

Public Comments

There were no requests to make public comments.

Status Report

Updates were provided by Doug Larson and Tom Carr (WIEB) on the following topics:

- On March 15, FERC approved 83 mandatory reliability standards proposed by NERC and directed NERC to improve 56 of these standards in the coming years. The standards become effective in 60 days. The standards generally comport with WIRAB's January 3 advice to FERC. To mitigate the impact of an inadequate trial period, FERC has directed NERC and Regional Entities to exercise enforcement discretion. There remains concern whether the enforcement of incomplete standards will lead to an enforcement quagmire.
- On March 2, FERC held a technical conference on funding of WECC's Reliability Centers. Prospects for securing FERC's reconsideration of its denial of funding for WECC's RCs seems to be improving. NERC is still concerned

about the precedent effective of a favorable decision for FERC on issues such as the independence of RCs from transmission operators that host the RC.

- On March 12, the NERC Board of Trustees approved for submission to FERC WECC's proposed eight "Tier 1" regional standards. NERC's timely action was requested by WIRAB in its February 8, 2006 [advice to NERC](#). Bill Chamberlain (CA) expressed concern about NERC's imposition of conditions on its approval. Staff reported that NERC staff inappropriately concluded that the WECC-proposed standards were not entitled to deference by the ERO as required by Section 215 of the Federal Power Act.
- Although its agenda has not yet been posted, FERC may take up the proposed NERC-WECC delegation agreement at its April 19 meeting.
- NERC and WECC are holding a number of compliance workshops for interested parties. The workshops held thus far have been very informative. WIRAB members participating in such workshop can have their travel reimbursed by WIRAB.

#### Review of Proposed 2008 WIRAB Work Plan and Budget

Doug Larson reviewed NERC's schedule for developing and submitting to FERC 2008 budgets for itself, Regional Entities, and WIRAB. By May 11, Regional Entities are to provide NERC with the statutory portions of their 2008 budget and by June 1 their complete budgets. By July 12, Regional Entity budgets approved by their governing boards are to be submitted. The NERC Board will act on the budgets on August 2 and they will be submitted to FERC on August 24.

To begin development of a 2008 WIRAB budget, staff prepared a draft work plan and budget memo. Given the limited experience with the 2007 budget, the draft budget assumes the same level of funding as 2007. WIRAB agreed with the steady state operating cost assumption for the 2008 budget and the position that any unspent funds from 2007 (e.g., due to delays in hiring staff) would be used as reserves in 2008. Regarding the 2008 work plan, to stimulate thinking staff identified six potential new areas of emphasis: increased oversight of WECC activities; identifying ineffective WECC or NERC standards or holes in WECC and NERC reliability standards that need to be filled; examining whether the threat of large penalties is killing the incentive for WECC to develop new standards; reviewing violations to determine trends and bad actors in the Western Interconnection; examining Available Transfer Capacity practices; and identifying better practices by other Regional Entities that WECC should adopt. Marsha Smith (ID) and Rebecca Wagner (NV) urged attention to ATC issues. Tony Usibelli (WA) suggested WIRAB examine international issues. He also supported the proposed workshops in the 2007 budget to get feedback on the implementation of mandatory standards from the industry and state/provincial consumer offices. Steve Ellenbecker (WY) urged that WIRAB begin a self-examination process through discussions with others. Bill Chamberlain urged WIRAB to include in its work plan participation by staff

and members in WECC compliance hearing body which serves as a pool of administrative judges to participate on hearings panels regarding disputes between WECC staff and registered entities (e.g., whether entities needs to be registered, whether a violation has occurred, the level of penalty assessed, the required mitigation plans). Participation in the body would be valuable to WECC and be useful in educating WIRAB members. Chamberlain also noted that WIRAB staff should observe some readiness evaluations, as proposed in the 2007 work plan. Staff was directed to incorporate these ideas into the next draft of the 2008 WIRAB work plan.

The objective is to have an approved WIRAB 2008 budget and work plan by May 11.

#### Potential Advice to FERC on Proposed WECC Regional Standards

Tom Carr reviewed the proposed advice to FERC. The advice supports FERC approval of the proposed WECC regional standards and discusses the NERC process for reviewing proposed interconnection-wide standards. Staff was directed to add to the proposed advice a request that FERC provide NERC with guidance on the implementation of the statutory provisions for granting proposed interconnection-wide standards deference. WIRAB members were asked to provide suggested edits to staff. Staff will prepare a second draft of proposed advice to FERC.

#### April 4 WIRAB Meeting

Doug Larson outlined the agenda for the April 4 WIRAB meeting that includes six discussion topics: near-term challenges in enforcing compliance with mandatory standards beginning June 1; funding and upgrading the capabilities of Western Interconnection Reliability Centers; improving the usefulness of reliability adequacy assessments; implementing the NERC-WECC delegation agreement; improving the economic criteria for evaluating reliability standards, and increasing collaboration between WIRAB and FERC. John Savage (OR) noted that he will send an email to FERC, NERC and WECC asking if there are topics they would like to discuss.

#### Next Steps

- The next WIRAB conference call meeting is set for May 4 at noon CST / 11:00 a.m. MST / 10:00 a.m. PST. To connect dial 404.260.1415; passcode 4290832. Likely agenda items are: approval of the summary of the March 26 WIRAB meeting; public comments; approval of a 2008 WIRAB work plan and budget; and an update on recent developments, including a report on FERC's April 19 meeting.
- WIRAB members are asked to provide any edits to the first draft of advice to FERC on approval of WECC's proposed regional standards will be circulated to WIRAB members. A second draft will be circulated to WIRAB members for a vote. [Note that on March 26, NERC filed the proposed WECC regional standards with FERC.]

- Staff will revise the proposed budget and work plan to reflect the discussions on the call. It is expected that WIRAB would take final action on the budget and work plan during its May 4 conference call meeting