

Summary of the December 3, 2009 WIRAB Meeting

The following members participated in the December 3, 2009 Western Interconnection Regional Advisory Body (WIRAB) meeting, and constituted a quorum.

Alberta	Jason Adams
British Columbia	Scott Barillaro/Jack Buchanon
California	Bill Chamberlain
Idaho	Marsha Smith
Nebraska	Tim Texel
Nevada	Rebecca Wagner
Oregon	John Savage/Matt Muldoon
South Dakota	Brian Rounds
Washington	Tony Usibelli
Wyoming	Steve Ellenbecker

Also present were Tom Schneider/Constance White (WECC); Pat Van Midde (SDG&E); Jerry Smith (K.R. Saline); and Doug Larson/Tom Carr/Jim Williams (WIRAB).

John Savage (OR) opened the meeting, and welcomed guests from WECC. He reviewed the meeting agenda, and asked for public comments. Hearing none, he proceeded with the agenda as outlined.

Approval of Recent Meeting Summaries

WIRAB Chairman John Savage (OR) asked for corrections or objections to the draft summary of the August 17 meeting. No corrections or objections were made, and the summary was approved. The Board also approved summaries of:

- The joint WIRAB/CREPC meeting on November 5 (in Tempe, AZ);
- The WIRAB webinar with NERC, SERC, and WECC on reliability metrics on October 20; and
- The WIRAB/CREPC webinar on WECC's Power Supply Assessment on Oct. 6.

Staff Report on Violations That Have Been Made Public

WIRAB staff reported on its initial assessment of the NERC database on enforcement actions submitted to FERC through November 13, 2009. The database includes 1028 alleged requirement violations, of which 558 (54%) involve 113 entities registered in the WECC region. Also included is information on the standards and requirements violated, the violation risk factor, the penalty (or settlement) recommended, and (except for entities included in the omnibus filing) links to notices-of-penalty, which provide information on the findings underlying the violation.

Staff emphasized the distinctions between the NERC data and WECC's compliance and enforcement information:

- NERC enforcement actions are released only after submittal to FERC. WECC cannot release information on individual violations. The violations for which information has

been released occurred some time ago, and have since been working their way through the compliance-enforcement process.

- The NERC data includes other (U.S.) regions, making possible regional comparisons.
- The NERC data identifies entities, and (except for the omnibus filing) notices-of-penalty identify the findings underlying the alleged violations.

WIRAB members offered several observations:

- Locational information on the entities and their service areas would be useful.
- All alleged violations do not have equal relevance to reliability. How do we make the distinctions?
- The violations found may reflect characteristics of the violations discovery process, e.g., regional entity targeting of certain standards.
- As NERC submits new sets of violations, it will be interesting to identify trends, e.g., repeat violations.
- The mass of data in the NERC database needs to be synthesized in ways that highlight WIRAB-relevant information.
- When presenting violation information, staff needs to more fully describe the standard being violated. WIRAB members would like to delve into which of the violations should be of greatest concern. Staff will prepare a working paper for WIRAB on ways to evaluate the relevance of different violations. The goal of presenting violation information should be to maximize information and minimize the number of tables.
- Inter-regional comparisons of violations may not provide adequate information about the progress in protecting reliability. (Connie White, WECC, volunteering to find out what types of inter-regional comparisons NERC may be contemplating.)

Staff will address these issues and report at the next WIRAB meeting.

WECC General Update

Tom Schneider reported that no announcement has been made regarding the DOE transmission Funding Opportunity Announcement funding decisions.

The agenda for the upcoming WECC Board meeting includes technical sessions on results-based standards, cyber security, congestion management, and frequency response reserves.

The results-based standards development project was approved by the NERC Board on November 4. As a member of the ad-hoc committee, Steve Ruckert (WECC) will be involved in next steps.

In response to a question, Schneider reported that the status of WECC Tier 1 standards is unchanged since June.¹

¹ The “Tier 1 standards” include:

BAL-002-WECC-1: Contingency reserve

FAC-501-WECC-1: Transmission maintenance.

IRO-006-WECC-1: Qualified transfer path unscheduled flow relief.

PRC-004-WECC-1: Protection system and remedial action scheme misoperation.

TOP-007-WECC-1: System operating limits.

VAR-001-WECC-1: Automatic voltage regulators.

WECC Compliance and Enforcement Update

Connie White, WECC Vice President of Compliance, reported on the status of violations currently in the WECC-NERC-FERC enforcement process:

- The November 30 total violations (1288) is up slightly since WECC's October 29 report at the WIRAB/CREPC meeting (1259). However, approval of the omnibus filing moved nearly 460 violations from "approved by NERC" to "approved by FERC."
- WECC identifies 135 violations as "held-in-abeyance," meaning that Notice of Alleged Violation and Proposed Penalty or Sanction (NAVAPS) have been issued but for several possible reasons the violation is not currently being "worked" by the WECC Compliance Division.

White presented violations by monitoring method, distinguishing those discovered by on-site and off-site audits. Over the past 10 quarters, the number of violations discovered per audit has declined dramatically. White attributes the decline to three factors:

- Recent audits have involved larger entities; such audits cover more standard requirements, often without generating more violations.
- Recent WECC audits have increasingly focused on the factors impacting reliability and reduced the emphasis on documentation.
- WECC outreach and education may be helping entities become more compliant.

White reported that FERC has not yet approved the NERC filing regarding the administration of the Technical Feasibility Exceptions process. As WECC expects 3000-6000 applications for TFEs (beginning in mid-December), and hopes to avoid a large backlog of TFEs under review, this is a current concern.

White reported that on November 13 FERC approved NERC's "omnibus" filing. The approval clears 564 alleged violations (458 in the WECC region) involving 140 entities. Of the total, 541 (96%) involve no monetary penalty. Twenty-three violations involving 8 entities (none in WECC) had penalties ranging from \$1,000 to \$15,000, averaging \$4,000.

NERC Update

Tom Schneider reported the hiring of Gerry Cauley as the new NERC President and CEO, replacing Rick Sergel. Cauley participated in the October 20 WIRAB webinar on results-based standards. Schneider expects him to appreciate the role of the regional entities, and to be supportive of efforts to streamline compliance-enforcement processes through measures such as abbreviated notices-of-penalty. FERC recently requested that NERC file a proposal on abbreviated notices-of-penalty.

NERC has issued its 2009 Long-Term Reliability Assessment. WIRAB will be reviewing the 400+ page document.

WIRAB Business

The next WIRAB meeting was scheduled for January 22 at 10:00 a.m. PST / 11:00 a.m. MST / noon CST.

The next in-person WIRAB meeting was tentatively scheduled for the 3rd week of April—
i.e. April 19-22.