

Summary of May 22, 2009 WIRAB Meeting

The following members participated in the May 22, 2009 Western Interconnection Regional Advisory Body (WIRAB) 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
Utah	Dianne Nielson
Washington	Tony Usibelli
Wyoming	Steve Ellenbecker

Also present were Louise McCarren / Tom Schneider / Connie White (WECC), Pat Van Midde (SDG&E), Susan Henderson (Xcel), Dave Warren (WPUDA), Matt Muldoon (OR PUC) and Doug Larson / Tom Carr (WIRAB).

Approval of the March 17, 2009 and April 7, 2009 Meeting Summaries

WIRAB Chairman John Savage (OR) asked for corrections to the draft summaries of the [March 17](#) and [April 7](#) WIRAB meetings. No corrections or objections to the summaries were made and the summaries were approved.

Discussion of Potential Advice

Because of time constraints for some WIRAB members, WIRAB first discussed topics for potential advice including the allocation of the cost of cyber security audits at nuclear power plants and the second draft of NERC's three-year self assessment. Regarding the nuclear power plant audits, the following questions were raised: Why shouldn't the Nuclear Regulatory Commission be doing these audits? [The NRC is reportedly not interested in doing the audits.] Should Regional Entities or NERC do the audits? What are the cost impacts on western consumers if the costs are spread across all U.S. load when the Western Interconnection only has eight of the 104 licensed power plants? Does allocating the cost of nuclear plant cyber security audits to individual plants create a slippery slope where other types of audits will be allocated to specific companies rather than be funded based on the net energy for load allocation used to fund most Section 215 activities? Staff was directed to investigate these questions and prepare potential advice, if warranted.

Regarding the second draft of NERC's three-year self-assessment, Louise McCarren (WECC) highlighted multiple issues: NERC's proposal to require that Regional Entity boards of directors have independent members oversee the compliance program; success of the delegated model; earlier NERC involvement in Regional Entity

compliance activities, and event analysis. Regarding the oversight of Regional Entity Compliance programs, it was noted that the development of independent boards is not required by Section 215 of the Federal Power Act; the issue does not appear to be driven by concerns of FERC commissioners; NERC is getting substantial push back from stakeholders to its proposal; WECC staff standards of conduct ensure independence from registered entities; and unlike the NERC Board, compliance actions taken by staff do not get reviewed by the WECC Board.

NERC's draft assessment also proposed that NERC staff become involved earlier in Regional Entity compliance activities. There was uncertainty surrounding what the proposal meant and NERC's motivation in making the proposal. WIRAB staff was directed to prepare proposed advice on two topics in the second draft of the NERC assessment: independence of Regional Entity Boards; and NERC's early involvement in Regional Entity compliance programs. WIRAB set as its objective to approve advice on these topics by the May 29 deadline NERC set for comments.

Public Comment

There were no public comments.

WECC Update

Louise McCarren briefed WIRAB on other issues that have arisen in the NERC self-assessment process, including whether the delegated model works (stakeholders are saying it does); whether enough time has elapsed to refine the delegated model (it hasn't); and whether under a self-regulated model, industry can be trusted to set high enough standards (it can).

Regarding event analysis, McCarren noted there is a tension between the historical approach which is based on engineer-to-engineer analysis of the disturbance and relatively rapid dissemination of findings and the current system in which an event is likely to trigger a regulatory investigation. The current system results in delays in the release of findings from events. This issue was discussed at a recent NERC stakeholder meeting in Denver on its three-year assessment where it was observed that other fields have addressed this issue. For example, in the case of airline crashes the National Transportation Safety Board conducts an immediate investigation and the Federal Aviation Administration regulates airline safety.

Connie White (WECC) provided an [update](#) on the WECC compliance program. The discussion focused on the inactivity of the Compliance Hearing Body and the number of settlements. Tony Usibelli (WA) asked if the standards and enforcement regime has resulted in any material improvement in reliability. McCarren said that NERC is just beginning to track reliability measures.

Tom Schneider (WECC) reviewed the evolving [approach WECC](#) is taking in developing a potential joint proposal with the Western Governors' Association to DOE

for stimulus bill funds for transmission activities. Schneider noted that WECC anticipates that one priority will be expanding the depth of TEPPC study efforts. Doug Larson (WIRAB) reported on feedback he has received from members of CREPC and the WIEB Board on the WGA elements of a joint proposal. He noted state interest in adequate travel funds for state personnel, inclusion of state consumer counsels and potential contract funds that PUCs could tap for evaluating multi-state transmission issues. DOE has not issued a Funding Opportunity Notice yet, so the parameters of any joint WECC-WGA proposal cannot be determined yet.

Action Items

Rebecca Wagner (NV), WIRAB Vice Chair, and Doug Larson summarized the action items from the call:

- Regarding WIRAB advice on the second draft of the NERC three-year self-assessment, WECC will provide WIRAB staff with their proposed comments, WIRAB staff is directed to develop draft advice by May 27, and WIRAB members will be asked to provide votes/edits on draft advice before the May 29 filing deadline with NERC.
- Staff is directed to draft advice on the NERC proposed 2010 budget related to the cost of nuclear power plant cyber security audits.
- Staff is directed to draft proposed WIRAB advice to FERC on WECC proposed revised Tier 1 standards once NERC has filed all standards with FERC.
- The next WIRAB conference call meeting will be held on June 29 at 11:00 a.m. PDT / noon MDT / 1:00 CDT. Among other actions, WIRAB will act on the proposed 2010 WIRAB budget.