

Summary of the November 22, 2010 WIRAB Meeting

The following members participated in the November 22, 2010 Western Interconnection Regional Advisory Body (WIRAB) meeting, and constituted a quorum.

Alberta	Ian McKay
British Columbia	Jack Buchanan
California	Bill Chamberlain
Colorado	Jim Tarpey
Idaho	Marsha Smith
Montana	Tom Kaiserski
Nebraska	Tim Texel
Oregon	John Savage
Utah	Dianne Nielsen
Washington	Toni Usibelli; Mark Anderson

Also present from WECC were Louise McCarren (CEO), Steve Reuckert (Director of Standards), Dave Godfrey (Director of Standards Development and Planning Services), Taud Olsen (Director of Stakeholder Relations and Compliance Outreach), and Michelle Mizumori (Managing Director of Operations and Market Interface). Also present were Jessica Bian (NERC staff: Reliability Metrics Working Group), Pat van Midde (SDG&E), and Philip Narendra (SMUD). Participating WIRAB staff included Doug Larson, Victoria Ravenscroft, Tom Carr, Steve Ellenbecker, and Jim Williams.

John Savage (OR) opened the meeting and welcomed guests. He reviewed the meeting agenda, and asked if there were further changes or additions to the agenda. Hearing none, he proceeded with the agenda as circulated.

Approval of Recent Meeting Summaries

WIRAB Chairman John Savage (OR) asked for corrections or objections to the draft summary of the August 26, 2010 meeting. No corrections or objections were made, and the summary was approved.

WIRAB Workshop/Webinar of Cybersecurity Issues

John Savage asked for Members' thoughts on whether WIRAB should conduct a workshop on cybersecurity issues. Marsha Smith (ID) asked about the degree to which the workshop would focus on Critical Infrastructure Protection (CIP) standards. After discussion, it was decided the Savage will work with WIRAB staff to develop an outline to be circulated for Board consideration.

Public Comments.

No public comments were received.

Update on Recent FERC Actions

- Doug Larson briefly reviewed FERC's November 18 Notice of Proposed Rulemaking (NOPR) on **integration of variable generation**. Among other provisions, the NOPR would require intra-hourly transmission scheduling and power production forecasting. The NOPR has a 60-day comment period. Bill Chamberlain (CA) inquired whether the NOPR was issued under FERC's

authority regarding reliability standards or its general authority over investor-owned utilities. The answer was primarily the latter, but with reference to the former. It was not decided whether WIRAB should respond to the NOPR.

- Larson also mentioned FERC’s final rule directing NERC to revise its **definition of the term “bulk electric system”** (BES). The rule includes in the BES all facilities operated at or above 100 kV, but establishes an exception process (with criteria) by which certain facilities might be excluded. Under the rule, NERC may propose an alternative approach that is as or more effective as that provided by FERC.
- Larson referred discussion of FERC actions on **Interconnection Reliability Operating Limits** to Steve Reukert.

WECC CEO Report

Louise McCarren briefly discussed a recent meeting of herself and Mark Maher (WECC COO) with FERC Commissioners John Norris and Cheryl LaFleur and FERC Office of Enforcement Director Norm Bey. She reported their interest in WECC’s transmission planning efforts. McCarren and Maher also met with FERC Office of Electric Reliability Director Joe McClelland, who was happy with the provision for deference to NERC found in FERC’s recent NOPR on the bulk electric system.

WECC System Vulnerabilities

Dave Godfrey discussed WECC efforts to assess system vulnerabilities. He made a distinction between “reliability” (adequacy and operating reliability) and “vulnerability” (weakness or potential exposure), noting that the latter is WECC’s current emphasis. He identified WECC’s three types of data for assessment (compliance violations; disturbance reports; and performance data from WECC Reliability Center operations), and noted that WECC is trying to be forward-looking. NERC’s “adequate level of reliability” metrics are useful, he said, but are generally backward-looking. Particularly regarding forward-looking metrics, WECC is not guaranteed to get it right the first time. Godfrey stated that it may be 6 to 9 months before WECC has “meaningful data.” John Savage noted that WIRAB may call on him again during this process.

Standards Issues

Steve Reukert provided a useful update on four important standards issues:

- **FERC Remand of BAL-002-WECC-1** (Contingency reserves). FERC’s key objection was to the extension of time to replace contingency reserves (from 60 to 90 minutes) in the event of an incident. FERC maintains that the extension increases the likelihood of a second major contingency. Reukert said it is difficult to prove that it does not do so. Tony Usibelli asked about demand side management in the FERC remand. Reukert said that FERC seems to want those exact words, not the standard’s reference to “load, other than interruptible loads” for contingency reserves. Bill Chamberlain asked whether DSM is a well-defined NERC term, or whether it may be differently or vaguely defined. Chamberlain then inquired about WECC’s recommended path forward regarding this standard. Reukert suggested that WECC may file for a rehearing, include more evidence in support of the proposed 90 minute contingency reserves replacement period, and ask for approval with clarifications regarding “demand side management.” Doug Larson inquired about the WECC response to a NV Energy comment that, since balancing authorities do not control all generating resources within their footprints, the standard may require BAs to bear a disproportionate share of contingency reserve obligations. Reukert responded that this issue should be addressed at the continent-wide level.

- **FERC NOPR on IRO-006-WECC-1 (Unscheduled Flow Relief).** FERC’s NOPR Raised questions regarding requirements # 1 and #2, which make the reliability coordinator responsible for initiating schedule curtailments, and make balancing authorities responsible for implementation. Reukert said that the different requirements address different things, and that neither takes precedence. Comments are due by December 22, and WECC will recommend approval in current form, but will do a better job of explanation.
- **CIP-002-4: Critical Cyber Asset Identification.** Reukert noted that WECC made no recommendation, positive or negative, regarding adoption of “bright line” criteria for critical cyber asset identification, but that the American Public Power Association, in an influential letter, had recommended “no.” He mentioned key pros and cons of the proposed “bright line criteria,” noting that about 58% of WECC entities (but only 35% elsewhere) voted “yes.” John Savage inquired what comes next. Reukert expects a recirculation ballot (giving entities an opportunity to change their minds) or a redraft (requiring all comments to be addressed). He further noted that FERC may take the issue out of industry’s hands if it persists in rejecting bright line criteria.
- **NERC Rules of Procedure Regarding Standards Adoption.** In a March 2010 order, FERC expressed concern that the NERC ballot body voting process to approve standards can be used to avoid compliance with FERC Orders—i.e., by not responding positively to such orders. FERC’s July 7 “technical conference” was intended to address industry concerns on this topic. Reukert outlined three alternative responses currently being considered by NERC. All involve some NERC Board authority to intervene in the standards voting process. Some are more likely to be acceptable to industry; others may be more acceptable to FERC. WECC will probably provide comments, which are due December 3.

WIRAB Business Meeting

- **Variable generation integration analysis of Regional Transmission Plans.** Doug Larson proposed the need for an analysis of the Western power system’s capability to reliability integrate the amount of wind and solar generation being assumed in WECC transmission expansion studies. (Presently, WECC transmission expansion studies use models that dispatch the lowest cost generation to meet load without a separate analysis of whether large amounts of assumed wind and solar generation will create any operating reliability challenges). Since the WIRAB meeting, the State-Provincial Steering Committee included such an analysis as one of its 2011 study requests.
- **Energy Imbalance Market Study.** Larson reported that WECC included the EIM study in its budget request, which was approved. WIRAB will shortly write a check for its \$25,000 contribution to the study.
- **WIRAB violations mapping project.** Victoria Ravenscroft and Eric Ironside (ESRI) reported on progress developing the WIRAB reliability violations mapping tool. The user interface is under development and a demonstration with a limited data model is now possible. Assuming the release of public data by WECC, staff hopes to complete the project by the end of the year.