

DRAFT
Summary of the August 26, 2010 WIRAB Meeting

The following members participated in the August 26, 2010 Western Interconnection Regional Advisory Body (WIRAB) meeting, and constituted a quorum.

Alberta	Ian McKay, Jason Adams
British Columbia	Scott Barillaro
California	Bill Chamberlain
Idaho	Marsha Smith
Montana	Tom Kaiserski
Nebraska	Tim Texel
Nevada	Rebecca Wagner
Oregon	John Savage
Texas	Donna Nelson, Melissa Oehler
Washington	Mark Anderson

Also present from WECC were Louise McCarren (CEO), Steve Reuckert (Director of Standards), John McGee (Director of Compliance Audits and Investigations), Taud Olsen (Director of Stakeholder Relations and Compliance Outreach), and Darrell McAdam (Senior Compliance Technical Analyst). Participating WIRAB staff included Doug Larson, Victoria Ravenscroft, Steve Ellenbecker, and Jim Williams.

John Savage (OR) opened the meeting and welcomed guests from WECC. He reviewed the meeting agenda, noting that the action item on state/provincial net-energy-for-load calculations for WIRAB voting had been withdrawn for consideration at the next WIRAB meeting. He asked if there were further changes or additions to the agenda. Hearing none, he asked for public comments. Hearing none, he proceeded with the agenda as revised.

Approval of Recent Meeting Summaries; Public Comments

WIRAB Chairman John Savage (OR) asked for corrections or objections to the draft summary of the June 3, 2010 meeting. No corrections or objections were made, and the summary was approved. No public comments were received.

The FERC Technical Conference on Standards Development and Enforcement (July 6, 2010)

WIRAB Chairman John Savage asked Louise McCarren for her observations on the July 6 FERC Technical Conference. She noted the industry participants (including the ERO and the regions) had emphasized that NERC standard-setting is an ANSI¹-approved process. The Canadians, in particular, rely on ANSI-approval as a condition of their buy-in, and are uncomfortable with FERC intrusion.

Ms. McCarren referenced the recent NERC Board meeting in Toronto, in which the Members Representatives Committee suggested that it (the MRC) might serve as the high-level

¹ American National Standards Institute

point of contact with FERC, particularly if more senior-level people were included. She added that there might be a role for WIRAB in supporting or advising on some such arrangement.

Ms. McCarren observed that the FERC Commissioners did not seem defensive at the meeting. She speculated that the Commissioners may not have been aware of the combined significance of the Commission's March 18 orders..

Regarding reliability metrics associated with NERC-Regional Entity delegation agreements, Ms. McCarren reported that this effort by NERC CEO Gerry Cauley is in its infancy. There has been significant work on metrics with little to show except for financial metrics.

Ms. McCarren also reported that the NERC-WECC delegation has been signed and sent to FERC for approval. FERC has approved WECC's amended 2010 business plan and budget which reflects DOE grants awarded to WECC under the stimulus legislation.

Proposed BAL-002-WECC-1

Steve Ruekert reviewed the recent history of this proposed regional standard regarding Contingency Reserves.² Reukert noted the several arguments that WECC has made to the FERC staff:

- The proposed revision improves reliability;
- WECC's technical expertise should be given "due weight";
- The revision extends the contingency reserve requirement to wind and solar power which are expanding rapidly in the Western Interconnection;
- The proposed standard is more stringent than the continent-wide standard because its contingency reserve requirement is the *greater* of the most severe single contingency or 3% of load plus 3% of net generation.
- The proposed standard limits load-shedding to meet contingency reserve.
- The term "interruptible reserve" includes demand-side management (if deployable within 10 minutes);
- The Contingency Reserve Restoration Period is extended by 30 minutes, which allows the use of e-tag transfers to replace contingency reserves. In its investigation in response to FERC concerns, WECC found only six events over the past 15 years where the extended reserve replacement period would have been used.

Reukert observed that, in follow-up discussion, FERC staff has focused on Frequency Response Reserves, which he believes should be addressed by BAL-003.³ FERC has announced a September 23 (10 AM-4 PM EST) technical conference on frequency response reserves, to review the results of FERC's long-delayed study of frequency response and its implications for standards appropriate in the several regions.

WIRAB Advice Regarding BAL-002-WECC-1

² The Continent-wide standard (BAL-002-1) is titled "Disturbance Control Performance."

³ BAL-003-0.1b: Frequency Response and Bias.

WIRAB members considered whether to provide advice to FERC that the Commission should not remand the proposed regional standard. The consensus was that WIRAB should provide advice, expanding on the bullet points in previous drafts. Staff was directed to circulate to WIRAB members proposed advice to FERC.

Regarding the upcoming FERC technical workshop of frequency response, Bill Chamberlain recommended that WIRAB should recognize that WECC may need a standard on frequency response reserves, but it will take time to evolve from current study results to appropriate standards for different regions. In the meantime, we should not deny improvements such as BAL-002-WECC-1 regarding Contingency Reserves.

WECC Vulnerability Assessment

John McGee reviewed WECC's recent efforts to develop a vulnerability assessment. As part of the assessment, WECC staff is trying to better understand the nexus between reliability and violation of standards. The WECC Reliability Centers (in Longmont, CO and Vancouver, WA) identified what they believe to be the most critical standards. The WECC compliance auditors examined the most violated standards and the reliability impact statement (minimal, moderate, severe) that accompanies each violation.

Mr. McGee noted that many violations are reported through self reports or through self certifications. Some entities are doing a good job in minimizing violations, others, such as Generator Operators are struggling. Lack of appropriate documentation continues to be an issue. Most CIP 2-9 violations have been found in spot checks or CIP audits. Of the top ten most violated standard requirements (from July 2009 through June 2010), only three are considered "critical." Of the ten most critical standard requirements, the average number of violations was 9.7, of which 53% were self-reported. Of the other most violated (non-critical) standard requirements, the average number of violations was 37, of which 41% were self-reported.

Ms. McCarren has asked the Reliability Centers to identify each time a line is overloaded (even if it does not cause a violation) to determine if there is a pattern among companies or on specific lines. She also asked the RCs to track any changes that occur on a line when wind or solar generation comes on line to determine if there is a pattern.

Bill Chamberlain asked for clarification of data on TOP-005 (Operational Reliability Information) and MOD-010 and 011⁴ that were part of a presentation WECC staff made to the Western Electricity Industry Leaders' group.

McGee says that WECC intends to assemble the data on a quarterly basis, and to discuss results at upcoming meetings. He also observed that utilities are using the data to prioritize compliance efforts. WECC believes that the data points to a need for improved training of field technicians. The WECC Training Committee is examining whether WECC should assume a greater role in technician training. The analysis of violation trends is continuing.

Development of Violation Interpretive Map Tool

⁴ Transmission operators are required to report when and for how long transmission paths exceed their megawatt limits.

Victoria Ravenscroft (WIEB) reported on the WIRAB violations mapping project. The contract with ESRI was signed at the end of June. A productive kick-off meeting was conducted on July 20. At the end of July, the WECC Board was briefed on the project by Doug Larson (WIEB). ESRI work will begin September 6, and a version for internal review should be available in mid-October. Public release is expected in November. Hosting the tool in 2011 could require a separate contract of \$39,000, unless we are able to “hand the system off” to an entity that already has hosting capability.

Voting in WECC Committees

Bill Chamberlain reported that the WECC Governance and Nominating Committee (which he chairs) is considering an expansion of the number of voting classes (from three to six or eight) and requiring a two-thirds (rather than majority) vote for a WECC Committee to send a matter (such as a proposed standard) to the WECC Board. This could slow the progress of matters from Committees to the Board.,.

WECC Cost-Benefit Study

Doug Larson noted that WECC is holding a stakeholder workshop on its proposed benefit/cost study on the Efficient Dispatch Toolkit. The workshop will be held on October 5 in Salt Lake City. He added that WECC is coming close to the WIRAB request regarding study oversight and outreach to decision-makers. He said that travel costs to the meeting for WIRAB members or their designees would be reimbursed.

Next Meeting

The date for the next meeting was discussed. A meeting in the third week of October would permit a report on the October 5 EDT workshop and a review of the beta version of the violation mapping tool.